



4.19.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Applicable County Regulations and Design Requirements

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

- Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code Section 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).
- In the event that human remains are encountered during ground-disturbing construction activities on site or within the Project's off-site improvement areas, compliance with California Health and Safety Code § 7050.5 and Public Resources Code § 5097 et. seq. shall be required. State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. The County Coroner shall determine that no investigation of the cause of death is required, and determine if the remains are of Native American origin. In the event that the remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. If the NAHC is unable to identify a Most Likely Descendant, or if the Most Likely Descendant failed to make a recommendation within 48 hours after being notified by the NAHC, or the Project Applicant rejects the recommendation of the Most Likely Descendent, the Project Applicant shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further ground disturbance. Evidence of compliance with this mitigation measure, if human remains are found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.

Mitigation

The following mitigation measures as identified in EIR Subsection 4.5, *Cultural Resources*, shall apply; these mitigation measures are repeated below for convenience. It should be noted that in February 2025, Pechanga and Soboba tribe provided additional confidential comments and recommendations that are considered confidential and are not included in this EIR. The County will carefully consider the recommendations, and if feasible, they shall be implemented. If the recommendations are determined to be not feasible, they will not be included. The feasibility of the recommendations shall be addressed as the Cultural Resource Monitoring



Program (CRMP) is developed by the Project Archaeologist in coordination with the tribes and the County Archaeologist (see MM 4.5-1).

- 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, 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.
- 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 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, on a confidential map for reburial of any artifacts that will be impacted and/or discovered during grading.
- 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 portions of P-33-012915 (CA-RIV-7181), portions of P-33-012916 (CA-RIV-7182), and P-33-012917 (CA-RIV-7183).
- MM 4.5-4 060 - Planning-CUL. 6 Feature Relocation.** Site P-33-002918 (CA-RIV-7184) Feature D, P-33-12916 (CA-RIV-7182) Features A, B, C, D, CAR-04, CAR-05, CAR-08, CAR-10, 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 Tribes, 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 rebury the resource in the pre-designated reburial location.

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 the 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.

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 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 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 4.5-7 060 - 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 the 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.

Prior To Grading Final Inspection

- 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 collections made during an earlier project, such as testing of archaeological sites that took place years ago, if applicable), shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines Prehistoric Resources- One of the following treatments shall be applied.
- 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 4.5-9 070 - 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.

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 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.

Required Notifications

The following notifications are included as part of the recommendation of approval for TTM38510. They are intended to advise the applicant of various Federal, State and County regulations applicable to this entitlement and the subsequent development of the subject property.

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.

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 treatment has been accomplished.

* A cultural resource site is defined, for this purposes of Mitigation Measure MM 4.5-12, 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.

4.19.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. 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 recovery of any associated subsurface tribal cultural resources deposits. Implementation of Mitigation Measures MM 4.5-2 and MM 4.5-3 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 Measure MM 4.5-4 would ensure that relocation of features as 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, CAR-10, CAR-12 and CAR-13-I are coordinated between the Project Applicant, Project Archaeologist, and a representative from the consulting Tribe(s), and would ensure that these resources all would be relocated to permanent open space areas. Implementation of Mitigation Measures MM 4.5-5 and MM 4.5-6 would ensure that all ground-disturbing activities (i.e., grading) are monitored by a Native American monitor and 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 would ensure that temporary fencing is installed to preclude unplanned construction-related impacts to 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. Implementation of Mitigation Measure MM 4.5-8 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 would ensure that deed restrictions are recorded to restrict development within the ESAs, thereby ensuring long-term preservation of any sites or relocated tribal cultural resources within the Project's open space areas. Implementation of Mitigation Measure MM 4.5-10 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 and MM 4.5-12 would ensure that any previously-undiscovered tribal cultural resources identified on site or within the Project's off-site improvement areas during ground-disturbing activities are appropriately treated and documented as directed by the Archaeological Monitor, County Archaeologist, and Native American Monitor.

In consultation with Tribes, the County has determined that implementation of the required mitigation for impacts to tribal cultural resources would reduce the Project's potential impacts to tribal cultural resources, but the impact would remain significant and unavoidable after mitigation.



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 Western Municipal Water District (WMWD) 2020 Urban Water Management Plan (UWMP), dated May 18, 2021, which is herein incorporated by reference and is available for public review online at: <https://www.wmwd.com/215/Urban-Water-Management-Plan>. The analysis in this Subsection also relies on letters issued by the WMWD indicating the availability of water and sewer services in the local area, which are included as *Technical Appendix M* to this EIR. Refer to Section 7.0, *References*, for a complete list of reference sources.

4.20.1 EXISTING CONDITIONS

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. Waste disposal for the Project site and surrounding area is provided by Waste Management of the Inland Empire.

A. Water Service and Supply

Water service to the Project area is provided by the WMWD. WMWD provides potable water, recycled water, and wastewater services to an area of approximately 527 square miles and nearly one million people in a wholesale and retail capacity that spans from the northern Riverside County boundary to the southern Riverside County boundary. WMWD provides wholesale water to eight retail water agencies in the WMWD wholesale service area, including Western Retail. The Western Retail service area provides water to nearly 25,000 customer connections within the Riverside Retail System, the Murrieta Retail System, and the Rainbow Retail System. The Project site is located within the Riverside Retail System service area. (WMWD, 2022, pp. 3-1 to 3-4)

WMWD purchases imported water from Metropolitan Water District (MWD) and sells to wholesale customers within WMWD's service area, including WMWD's Western Retail service area. MWD delivers supply to member agencies from the Colorado River Aqueduct (CRA) and the State Water Project (SWP). WMWD receives wholesale treated imported water from MWD's Mills Water Treatment Plant (WTP) and Skinner WTP, in addition to raw water which is delivered directly to wholesale customers from various connections to MWD's systems. WMWD owns and operates the Mills Gravity Line, which distributes treated water from the Mills WTP to the WMWD Retail Riverside system and several other wholesale customers. (WMWD, 2022, p. 4-8)

WMWD retail's local water sources include groundwater, desalinated groundwater, and recycled water. In 2020, WMWD retail obtained approximately 60 percent of its total supply as imported water from MWD. The Riverside service area receives treated imported water from the Mills WTP, delivered through the Mills Gravity Line. WMWD may also purchase untreated water from MWD for non-potable uses. WMWD uses imported water to meet the balance of demands not met by local sources. (WMWD, 2022, p. 9-2)

WMWD extracts groundwater from the Riverside-Arlington basin and operates the Arlington Desalter. WMWD owns shares in Elsinore Valley Municipal Water District (EVMWD)'s Meeks and Daly Water



Company, which entitles WMWD to 226.52 acre-feet per year (AFY) of water from the San Bernadino Basin (SBBA). This water is conveyed by the City of Riverside and is used in the Riverside WMWD retail system. Additionally, groundwater is extracted from the Temecula Valley Basin, with WMWD extracting 399 AFY of potable water in 2020. Additionally, the City of Riverside and WMWD retail have a Cooperative Agreement for Long-Term Wheeling and Surplus Water Sales, which provides WMWD up to 2,000 AFY of City of Riverside surplus water and 4,600 AFY of leased Meeks and Daley Water Company Water until 2027. WMWD retail also purchases non potable water from the Riverside-Arlington basin from the City of Riverside EVMWD's Palm Well, which is delivered through the Riverside Canal. As indicated in Table 4.20-1, *WMWD 2020 Water Supply* WMWD had approximately 26,741 AFY of potable and non-potable water available. (WMWD, 2022, p. 9-2 through 9-11)

Table 4.20-1 WMWD 2020 Water Supply

SUPPLY SOURCE	SUPPLY, AFY
POTABLE	21,834
Metropolitan	12,004
Groundwater (San Bernardino Basin, Western Meeks and Daley)	226.52
Groundwater (San Bernardino Basin, Leased Meeks and Daley)	4,208
Groundwater (RPU Surplus)	3,163
Groundwater (Temecula Valley Basin)	399
Eastern (Murrieta)	1,834
NON-POTABLE	4,909
Metropolitan	1,819
EVMWD (Riverside-Arlington Groundwater)	944
RPU (Riverside-Arlington Groundwater)	388
WWRF	1,758
TOTAL SUPPLY	26,743

(WMWD, 2022, Table 9-4)

Table 4.20-2, *Western Retail Historic and Current Water Use* provides the breakdown of water use from 2013 to 2020 by WMWD customers. Total water demand in 2020 was approximately 25,134 AFY. There was a notable decline of water use in 2015 following the State's 2014 declaration of a drought emergency and implementation of a statewide mandatory demand reduction. After Statewide restrictions ended in 2016, demands rebounded slightly but have not returned to 2013 levels, despite adding nearly 1,600 new customer connections. The data in Table 4.20-1 and Table 4.20-2 indicates that WMWD had a surplus of water supply of approximately 1,607 AFY for the year 2020. (WMWD, 2022, p. 10-3)



Table 4.20-2 Western Retail Historic and Current Water Use

WESTERN RETAIL TOTAL	2013	2014	2015	2016	2017	2018	2019	2020
POTABLE								
Agriculture	510	532	449	432	453	487	454	397
Commercial	2,897	3,019	2,345	2,050	2,273	2,450	2,371	1,328
Single-Family	16,362	16,010	12,600	12,830	14,058	14,344	13,332	14,973
Landscape	2,360	2,538	1,883	1,898	2,285	2,313	2,011	2,563
Industrial	2,487	2,258	1,814	1,338	1,245	1,305	1,565	940
Military	290	234	237	234	237	274	266	132
Multi-Family	1,265	1,179	1,036	1,033	1,089	1,162	1,193	731
Temporary	53	223	41	204	274	378	315	159
Fireline	2	11	2	7	6	7	37	6
TOTAL POTABLE	26,226	26,003	20,406	20,025	21,919	22,720	21,545	21,230
NON-POTABLE								
Agriculture – Non-Potable	1,896	2,036	1,603	1,553	1,696	1,758	1,421	1,538
Landscape – Non-Potable	1,619	1,862	1,502	1,850	2,135	2,070	1,835	2,366
TOTAL NON-POTABLE	3,515	3,898	3,106	3,403	3,831	3,828	3,256	3,904
TOTAL DEMAND	29,741	29,900	23,512	23,429	25,750	26,548	24,801	25,134

(WMWD, 2022, Table 10-1)

Table 4.20-3, *Projected Water Supply*, presents the projected water supply available to WMWD. As shown, WMWD projects that approximately 52,900 AFY of potable and non-potable water will be available to retail service customers in 2045. WMWD indicates that there are adequate resources for normal, dry, and multiple dry years. Table 4.20-4, *Total Projected Demands for Water*, illustrates the projected water demands in five-year increments from 2025 to 2045. As indicated, the projected demand for WMWD customers in the year 2045 is 46,940 AFY. Thus, comparing the data from Table 4.20-3 and Table 4.20-4 shows that WMWD is projected to have a surplus of water supply of 5,960 AFY for the year 2045. (WMWD, 2022, pp. 9-11 to 9-12, 10-11)

B. Sewer Service and Treatment

As discussed in EIR Subsection 3.5.2, the City of Riverside would provide sewer services to the proposed Project. Sewer flows generated by the Project ultimately would be treated by the Riverside Water Quality Control Plant (RWQCP), located in the northwest portion of the City of Riverside at 5950 Acorn Street, approximately 7.2 miles northwest of the Project site. As currently constituted, the RWQCP consists of two



Table 4.20-3 Projected Water Supply

SUPPLY SOURCE	2025	2030	2035	2040	2045
POTABLE	27,073	30,199	33,686	37,574	41,821
Metropolitan ¹	14,680	19,306	22,293	26,181	31,928
Chino Desalter ²	3,534	3,534	3,534	3,534	3,534
Temecula Valley Basin Groundwater ³	1,452	1,452	1,452	1,452	1,452
Leased Meeks and Daley ⁴	4,680	4,680	4,680	4,680	4,680
Western Owned Meeks and Daley ⁵	226.52	226.52	226.52	226.52	226.52
City of Riverside Surplus ⁶	2,000				
Eastern North Perris Agreement ⁷	500	1,000	1,500	1,500	
NON-POTABLE	7,031	8,066	8,964	9,966	11,079
Metropolitan ⁸	1,671	1,300	1,300	1,300	1,681
Riverside-Arlington Basin Groundwater ⁹	2,500	3,131	3,104	3,465	4,100
WWRF ¹⁰	1,940	2,598	3,481	4,032	4,032
WRCWRA ¹¹	920	997	1,079	1,169	1,266
TOTAL SUPPLY	34,104	38,265	42,650	47,540	52,900

¹Available supply from Metropolitan determined as the remaining demand not met by local supply sources with a 10% buffer.

²Western's shares of the Chino Desalter, currently leased to Jurupa Community Services District.

³Planned groundwater extractions to serve the Murrieta service area.

⁴Agreement with EVMWD to lease Meeks and Daley groundwater rights.

⁵Western-owned Meeks and Daley groundwater rights.

⁶Based on the 2017 Agreement, surplus water sales. Additional surplus supply may be available in the future but is not guaranteed.

⁷Eastern Perris North Project.

⁸Non-potable supply from Metropolitan is assumed to meet the remaining demand not met by local supply sources.

⁹Expected supply used from local non-potable groundwater and delivered through the Riverside Canal, including Western's planned non-potable well and purchases from RPU and EVMWD's Palm Well.

¹⁰Projected 2030 WWRF effluent determined in the Riverside Non-Potable Facilities Master Plan. The rate of growth was calculated between 2030 and average 2017-2019 data (2018 used to determine rate of growth) and applied for years 2025 and 2030-2045. Based on this growth rate, the WWRF is expected to reach buildout between 2035 and 2040.

¹¹WRCWRA supply is not currently available to Western Retail customers as no infrastructure currently exists to convey recycled water from the plant to Western Retail. This supply is currently considered surplus supply but Western is evaluating opportunities to make use of it.

(WMWD, 2022, Table 9-5)



Table 4.20-4 Total Projected Demands for Water

PROJECTED WATER USE	2025	2030	2035	2040	2045
POTABLE					
Agriculture	443	494	551	615	685
Commercial	1,481	1,652	1,843	2,056	2,288
Single-Family	16,703	18,632	20,783	23,182	25,803
Landscape	2,859	3,189	3,557	3,968	4,417
Industrial	1,049	1,170	1,305	1,456	1,620
Military	148	165	184	205	228
Multi-Family	815	909	1,015	1,132	1,260
Temporary	177	198	220	246	274
Fireline	6	7	8	9	10
Losses - Potable	930	1,037	1,157	1,289	1,435
TOTAL POTABLE	24,612	27,454	30,624	34,158	38,019
NON-POTABLE*					
Agriculture – Non-potable	1,779	2,058	2,296	2,561	2,857
Landscape – Non-potable	2,737	3,166	3,532	3,940	4,396
Losses – Non-potable	1,039	1,202	1,340	1,495	1,668
TOTAL NON-POTABLE	5,555	6,426	7,168	7,997	8,921
TOTAL DEMAND	30,167	33,879	37,792	42,155	46,940

*Non-potable demands include demand met by recycled water. Western cannot distinguish between recycled water and non-potable deliveries as its system is combined.

(WMWD, 2022, Table 10-4)

separate treatment plants and one common tertiary filtration plant. These provide preliminary, primary, secondary and tertiary treatment for a rated capacity of 40 million gallons per day (mgd). (Riverside, n.d.)

C. Stormwater Drainage

Under existing conditions, the Project site consists of open, undeveloped land that largely consists of former agricultural land and open space with a prominent drainage (Goldenstar Creek) traversing the Project site in a southeast to northwest direction. Stormwater is currently draining onto the Project site from the south along Iris Avenue and from the east along Chicago Avenue. All areas on site are tributary to Goldenstar Creek, with exception of two small drainage areas along the western boundary in the southern portions of the site, which convey flows off site to the west. Flows within Goldenstar Creek converge with an off-site drainage in the



northwest portion of the Project site, and flows from both drainages discharge from the Project site at the northwest corner of the site. Peak flows within Goldenstar Creek at the northwest corner of the Project site is approximately 507.3 cubic feet per second (cfs). (Rick, 2022a, Appendix B) Refer to EIR Subsection 4.10, *Hydrology and Water Quality*, for a more detailed description of the existing drainage on site. (Rick Engineering, 2022c, p. 1)

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 Waste Management of the Inland Empire (WMIE). Waste within the Project area is sent directly to the El Sobrante Landfill, which is southwest of the Project site. Other landfills within the County that could handle solid waste generated by the Project include the Lamb Canyon Landfill and the Badlands Landfill.

- El Sobrante Landfill. The El Sobrante Landfill is located in the southeast area of the City of Corona at 10910 Dawson Canyon Road and accessed from Interstate 15 (I-15) at Temescal Canyon Road. The landfill is operated and owned by USA Waste Services of California, Inc. of which WMIE is a subsidiary. The existing landfill encompasses 1,322 acres, of which 468 acres are permitted for refuse disposal. The landfill is currently permitted to receive 16,054 tons per day (tpd). Data available from CalRecycle shows that in February 2023, the El Sobrante Landfill received an average of approximately 9,412.17 tpd requiring disposal. As of April 2018, the landfill had a total remaining disposal capacity of 143,977,170 cubic yards. The El Sobrante Landfill is projected to reach capacity in 2051. (CalRecycle, 2023a; RCDWR, 2023a)
- Lamb Canyon Landfill. The Lamb Canyon Landfill is located between the City of Beaumont and the 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 RCDWR. The landfill encompasses approximately 703.4 acres, of which approximately 144.6 acres are permitted for waste disposal. The Lamb Canyon Landfill is currently permitted to receive 5,000 tpd. Data available from CalRecycle shows that in February 2023, the Lamb Canyon Landfill received an average of 1,928.43 tpd requiring disposal. The Lamb Canyon Landfill has an estimated total disposal capacity of approximately 39.7 million cubic yards. As of January 8, 2015 (the most recent date for which data are available), the landfill had a total remaining capacity of approximately 19.2 million cubic yards. The current landfill remaining disposal capacity is estimated to last until approximately April 2032. (CalRecycle, 2023b; RCDWR, 2023b)
- 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 RCDWR. The existing landfill encompasses 811 acres, of which 409 acres are permitted for refuse disposal. The Badlands Landfill has an existing daily capacity of 5,000 tpd. Data available from CalRecycle shows that in February 2023, the Badlands Landfill received an average of 3,166.88 tpd requiring disposal. As of December 18, 2020, the landfill had a total remaining disposal capacity of approximately 7.8 million cubic yards. The Badlands Landfill is projected to reach capacity at the earliest in 2059. (CalRecycle, 2023c; RCDWR, 2023c)



4.20.2 APPLICABLE ENVIRONMENTAL REGULATIONS

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, 2020e)

☐ 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, 2020j)

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.)

☐ **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.)

☐ **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 Urban Water Management Plans (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 is 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.)

☐ **California Senate Bill 610**

The California Water Code (Water Code) §§ 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 Water Code 10912 [a]) subject to CEQA. (DWR, 2003; CA Legislative Info, n.d.) For the purposes of SB 610, "project" means any of the following:



- (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.)

Because the Project proposes 231 single-family residences, a Water Supply Assessment was not required.

☐ **CA. 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.)

☐ **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 Department of Water Resources (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 610 (SB 610)**

SB 610, codified in Water Code Sections 10910-10915, specifies the requirements for water supply assessments (WSAs) and their role in the CEQA process, and defines the role Urban Water Management Plans (UWMPs) play in the WSA process. SB 610 requires that, for projects subject to CEQA that meet specific size criteria, the water supplier prepare WSAs that determine whether the water supplier has sufficient water resources to serve the projected water demands associated with the projects. 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:

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks 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
- Mixed-use projects that include one or more of the projects specified in this subdivision; or



- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (Water Code Section 912, CEQA Guidelines Section 15155(a).

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)

☐ **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 State Water Resources Control Board, 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 State Water Resources Control Board and beginning January 1, 2030, the bill establishes the greater of 50 gallons per capita daily or a standard recommended by the State Water Resources Control Board. 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 2019 California Plumbing



Code, which is based on the 2018 Uniform Plumbing Code, was published by the California Building Standards Commission and went into effect on January 1, 2019. (BCS, n.d.)

☐ **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.)

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. (BCS, n.d.)

☐ **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 Water Code Section 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.)

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, 2018a) 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, 2018a)

☐ Waste Reuse and Recycling Act (AB 1327)

The Waste Reuse and Recycling Act (WRRRA) 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 WRRRA also required local agencies to adopt a local ordinance by September 1, 1993 or allow the model ordinance to take effect. The WRRRA 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, 2018b)

☐ 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, 2020)

☐ 2016 California Green Building Standards Code (CAL Green; Part 11 of Title 24, California Code of Regulations)

California Code of Regulations, Title 24, Part 11 is referred to as the California Green Building Standards Code (CALGreen Code). CALGreen became effective January 1, 2017, and 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). Section 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. (CEC, 2018)

☐ **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.)

☐ **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.)

☐ **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.)



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. (CEC, 2018)

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 Sections 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. (CEC, 2018)

The 2019 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 2019 Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. (CEC, 2018)

Public Resources Code Section 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. (CEC, 2018)



☐ 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 Public Resources Codes. California Pub Res Code § 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)

☐ Alternative Fuels Plan

On September 24, 2009, the California Air Resources Board (CARB) adopted amendments to the "Pavley" regulations that reduce greenhouse gas (GHG) emissions in new passenger vehicles from 2009 through 2016. These amendments are part of California's commitment toward a nation-wide program to reduce new passenger vehicle GHGs from 2012 through 2016. CARB's September amendments will cement California's enforcement of the Pavley rule starting in 2009 while providing vehicle manufacturers with new compliance flexibility. The amendments will also prepare California to harmonize its rules with the federal rules for passenger vehicles. (CARB, n.d.)

The U.S. EPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles On June 30, 2009. The first California request to implement GHG standards for passenger vehicles, known as a waiver request, was made in December 2005, and was denied by the U.S. EPA in March 2008. That decision was based on a finding that California's request to reduce GHG emissions from passenger vehicles did not meet the Clean Air Act requirement of showing that the waiver was needed to meet "compelling and extraordinary conditions." (CARB, n.d.)

The ARB's Board originally approved regulations to reduce GHGs from passenger vehicles in September 2004, with the regulations to take effect in 2009. These regulations were authorized by the 2002 legislation Assembly Bill 1493 (Pavley). (CARB, n.d.)

The regulations had been threatened by automaker lawsuits and were stalled by the U.S. EPA's delay in reviewing and then initially denying California's waiver request. The parties involved entered a May 19, 2009 agreement to resolve these issues. With the granting of the waiver on June 30, 2009, it is expected that the Pavley regulations will reduce GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs. (CARB, n.d.)

The CARB has adopted a new approach to passenger vehicles – cars and light trucks – by combining the control of smog-causing pollutants and greenhouse gas emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California. (CARB, n.d.)

☐ 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 (PUC)

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.)

☐ Senate Bill 1389 (SB 1389)

Senate Bill (SB) 1389 (Public Resources Code Sections 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.)

4.20.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XIX of Appendix G to the CEQA Guidelines addresses typical adverse effects on utilities and service systems and includes the following threshold questions to evaluate a project's impacts on utilities and service systems (OPR, 2018a):



- Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?
- Would the project 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?
- 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?
- Would the project 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 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 stormwater 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 per the 2018 updates to the 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 stormwater drainage systems, whereby the construction or relocation would cause significant environmental effects?

A. Water Service and Facilities

As discussed in EIR subsection 3.5.3, potable water service to the Project would be provided from WMWD. As part of the Project, and as previously depicted on EIR Figure 3-8, under existing conditions there is an existing 8-inch water line located within Iris Avenue along the Project site's frontage. As part of the Project, a series of 8-inch water lines are proposed within Iris Avenue, the on-site portions of Chicago Avenue, and internal roadways on site in order to provide water service to each individual residential lot. Impacts associated with these 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

As described in EIR subsection 3.5.3, under existing conditions there is a 10-inch sewer line within Van Buren Boulevard. As part of the Project, a series of 8-inch sewer lines would be constructed within on-site roadways to provide sewer service to individual residential lots. All sewer flows generated by the Project would be routed to the proposed sewer lift station, which would be located in the northwest portion of the Project site. A force main is proposed to extend from the sewer lift station within Street B, Street A, and Chicago Avenue. The sewer main would discharge into a proposed 8-inch gravity sewer approximately 325 feet south of the Project site, which would connect to the existing 10-inch sewer line within Van Buren Boulevard. Impacts associated with the proposed sewer system 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

Sewer flows generated by the Project ultimately would be treated by the RWQCP, located in the northwest portion of the City of Riverside, approximately 7.2 miles northwest of the Project site. The RWQCP is capable of providing preliminary, primary, secondary, and tertiary treatment of 40 mgd of raw sewage (Riverside, n.d.). As shown in Table 4.20-5, *Project-Related Wastewater Generation*, the proposed Project is anticipated to generate approximately 53,360 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. As shown, the Project's demand for wastewater treatment would represent approximately 0.12% of the RWQCP's current total capacity ($53,360 \text{ gpd} \div 46,000,000 \text{ gpd} \times 100 = 0.124\%$). Accordingly, the Project would not result in or require the expansion of the existing facilities at the RWQCP, and impacts would therefore be less than significant. (Riverside County, 2015, Table 4.19-BJ)

Table 4.20-5 Project-Related Wastewater Generation

Land Use	Dwelling Units	Generation Factors	Wastewater Generation (gpd)
Residential	231 du	230 gpd/dwelling unit	53,360
Total:	--	--	53,360

(Riverside County, 2015, Table 4.19-BJ)

D. Stormwater Drainage

EIR Subsection 3.5.3 also includes a description of the Project's proposed stormwater drainage system. As previously shown on EIR Figure 3-7, the Project generally would maintain the existing drainage patterns on the Project site, with the site continuing to drain in a northwesterly direction. As proposed, the developed portions of the Project site would include three separate drainage basins, each being conveyed by separate storm drain backbone systems. As proposed, a series of catch basins are proposed throughout the proposed on-site roadways, with storm drain lines ranging in size from 18 inches to 54 inches. Runoff from the western portions of the Project site would be conveyed to the proposed water quality basin in Lot B, flows from the southeastern portions of the Project site would be conveyed to the proposed water quality basin in Lot C, and flows from the portion of the Project site located north of Goldenstar Creek would be conveyed to the proposed water quality basin in Lot D. Following detention and water quality treatment, all flows generated on the developed portions of the Project site would be discharged directly into Goldenstar Creek. Runoff that is tributary to the Project site from off-site areas to the west would be routed to a proposed storm drain bypass line that would range in size from 18 inches to 54 inches, with the run-on flows being conveyed through Lot C and directly into Goldenstar Creek.



Impacts associated with the above-described Project-related drainage 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 drainage improvements. As such, with the mitigation measures specified throughout this EIR, Project impacts due drainage improvements would be less than significant.

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

WMWD is responsible for supplying the region with its potable and non-potable water needs. On June 16, 2021, the WMWD Board of Directors adopted the 2020 UWMP. The UWMP provides information on WMWD's projected supplies and demands in five-year increments through the year 2045. WMWD's UWMP identifies current and future water demands and supplies, and provides a planning framework for water-related management decisions (WMWD, 2022, pp. 1-3, 2-7)

The WMWD UWMP bases its growth assumptions, in part, based on the land use designations of general plans within the WMWD's service area. At the time the 2020 UWMP was adopted by the WMWD, the Project site was designated by the Riverside County General Plan as "Rural Community – Very Low Density Residential (RC-VLDR)" land uses. Based on the mid-point densities identified in Appendix E to the County's General Plan, RC-VLDR land uses are expected to be developed at a midpoint density of 0.75 du/ac. Thus, based on the site's existing land use designations, the UWMP anticipated that the Project site would be developed with approximately 106 dwelling units (140.7 acres x 0.75 du/ac = 105.5 du). The Project's proposed General Plan Amendment No. 220009 would redesignate the Project site for "Rural Community – Low Density Residential (RC-LDR)" land uses, and the Project as proposed would accommodate a total of 231 dwelling units. As such, the Project would result in an increase in the number of dwelling units on site by approximately 127 dwelling units as compared to the number of dwelling units evaluated in and accommodated by the UWMP for the Project site. (Riverside County, 2021a, Appendix E, Table E-1)

As shown in Table 4.20-6, *Water Demand Comparison – Adopted vs. Project Land Uses*, and again based on the mid-point density identified by the General Plan, the adopted RC-VLDR land use designation for the Project site would generate a demand for approximately 128.3 AFY (or 114,463 gpd) of potable water. As shown, the Project's proposed 231 residential dwelling units would generate a demand for approximately 233.3 AFY (or 207,871 gpd), resulting in an increase in the site's potable water demand of approximately 105.0 AFY (or approximately 94,568 gpd) as compared to what was accounted for by the WMWD UWMP. As previously shown in Table 4.20-1 and Table 4.20-2, in 2020 the WMWD had a surplus of water supplies of approximately 1,607 AFY (1.4 mgd), while the data previously presented in Table 4.20-3 and Table 4.20-4 shows that the WMWD is projected to have a surplus of water supplies in 2045 of approximately 5,960 AFY (or 5.3 mgd).



Table 4.20-6 Water Demand Comparison – Adopted vs. Project Land Uses

Land Use	Acres	Dwelling Units	Generation Factors	Projected Water Demand
Adopted RC-VLDR	140.7	127	1.01 AFY/acre	128.3 AFY
Proposed Project	140.7	231	1.01 AFY/acre	233.3 AFY
Difference:	--	104	--	105.0 AFY

(Riverside County, 2015, Table 4.19-BI; Riverside County, 2021a, Appendix E, Table E-1)

The WMWD UWMP accounts for buildout of the Project site in accordance with the site's adopted General Plan land use designation of RC-VLDR. Thus, because the WMWD UWMP determined that the WMWD would have adequate supplies during normal, dry, and multiple dry years through at least 2045, the Project only has the potential to conflict with the UWMP projected supplies and demand based on the anticipated increase in the number of dwelling units proposed as part of the Project. As shown in Table 4.20-6, the Project would result in an increase in the number of dwelling units projected on site by 105 dwelling units, which would result in a net increase in demand of approximately 106.0 AFY (94,568 gpd). The Project's incremental increase in demand represents only 6.6% of WMWD's excess capacity in 2020 ($106.0 \text{ AFY} \div 1,607 \text{ AFY} \times 100 = 6.6\%$) and represents only 1.8% of WMWD's projected excess capacity in 2045 ($106.0 \text{ AFY} \div 5,960 \text{ AFY} \times 100 = 1.8\%$). Thus, the Project's incremental increase in water demand would be accommodated by WMWD's existing and projected excess capacity. Because the UWMP demonstrates that the WMWD would have sufficient water supplies even during single and multiple dry years to meet the projected demand within its district through the year 2045, it can be concluded that the WMWD would have sufficient water supplies to serve the Project based on existing entitlements and resources. Additionally, the Project would not result in or require the construction of new water treatment facilities or expansion of existing facilities. Therefore, impacts associated with the Project's water demand 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?

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?

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 WMWD. A description of proposed sewer improvements is provided in EIR Subsection 3.5.3. As discussed therein, a series of 8-inch sewer lines would be constructed within on-site roadways to provide sewer service to individual residential lots. All sewer flows generated by the Project would be routed to the proposed sewer lift station, which would be located in the northwest portion of the Project site. A force main is proposed to extend from the sewer lift station within Street B, Street A, and Chicago Avenue. The sewer main would discharge into a proposed 8-inch gravity sewer approximately 325 feet south of the Project site, which would connect to the existing 10-inch sewer line within Van Buren Boulevard. 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.

Sewer flows generated by the Project ultimately would be treated by the RWQCP, located in the northwest portion of the City of Riverside, approximately 7.2 miles northwest of the Project site. As previously shown in Table 4.20-5, the Project's 231 dwelling units are anticipated to generate approximately 53,360 gpd of wastewater requiring treatment. As previously noted, the RWQCP has a total capacity of 40 mgd (Riverside, n.d.). Thus, the Project's 53,360 gpd of wastewater would represent only approximately 0.13% of the RWQCP's total daily treatment capacity ($53,360 \text{ gpd} \div 40,000,000 \text{ gpd} \times 100 = 0.13\%$). Therefore, it can be concluded that the RWQCP would have adequate capacity to treat sewer flows generated by the Project, and the Project would not 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. Accordingly, because adequate treatment capacity exists at the RWQCP to treat the Project's sewer flows, Project impacts to wastewater treatment capacity would 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?

Solid waste generated by the Project would be disposed of at the El Sobrante Landfill, although the Lamb Canyon Landfill and the Badlands Landfill also could handle solid waste generated by the Project. The El Sobrante Landfill is permitted to receive 16,054 tpd. Data from February 2023 shows that the El Sobrante Landfill received approximately 7,412.17 tpd. The Lamb Canyon Landfill is permitted to receive 5,000. tpd. Data from February 2023 shows that the Lamb Canyon Landfill received an average of 1,928.43 tpd. The Badlands Landfill is permitted to receive 5,000 tpd. Data from January 2023 shows that the Badlands Landfill received an average of 3,166.88 tpd. (CalRecycle, 2023a; CalRecycle, 2023b; CalRecycle, 2023c; RCDWR, 2023a; RCDWR, 2023b; RCDWR, 2023c)

As shown in Table 4.20-7, *Project-Related Solid Waste Generation*, buildout of the proposed Project is expected to produce approximately 0.3 tpd of solid waste, or approximately 95.1 tpy, based on the rates used in EIR No. 521, which was prepared in conjunction with Riverside County's 2015 General Plan Update. Based on data available from CalRecycle, the El Sobrante Landfill has a daily capacity to receive 16,054 tpd while the El Sobrante Landfill received an average of only 9,412.17 tpd in February 2023, resulting in an excess daily capacity of approximately 6,641.83 tpd. The Lamb Canyon Landfill has a daily capacity for 5,000 tpd of solid waste while the Lamb Canyon Landfill received an average of only 1,928.43 in February 2023, resulting in an excess daily capacity of 3,071.57 tpd. The Badlands Landfill has a daily capacity for 5,000 tpd while the Badlands Landfill received an average of only 3,166.88 tpd, resulting in an excess daily capacity of 1,833.12 tpd. The Project's 0.26 tpd of solid waste would represent approximately 0.004% of the excess daily capacity at El Sobrante Landfill, approximately 0.01% of the excess daily capacity at the Badlands Landfill, and approximately 0.01% of the excess daily capacity at the Lamb Canyon Landfill. Because the Project would generate a relatively small amount of solid waste per day, as compared to the permitted daily capacities for the El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill, it is anticipated that these regional landfill



facilities would have sufficient daily capacity to accept solid waste generated by the Project. As such, because 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.

Table 4.20-7 Project-Related Solid Waste Generation

Land Use	Dwelling Units	Generation Factors	Total Solid Waste Generated (tpy)	Average Solid Waste per Day (tpd)
Residential	231	0.41 tons/du	95.1 tpy	0.26 tpd
Totals:	231	--	95.1 tpy	0.26 tpd

(Riverside County, 2015, Table 4.17-N)

Refer to the analysis of Threshold e. for a discussion of compliance with State or local standards related to solid waste and for a discussion of compliance with the County's solid waste reduction goals, both of which were determined to 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) (RCWRMD, 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. 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 Project would occur within the areas already planned for impact by the Project and off-site improvements. 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.

There are no anticipated capacity restrictions which could limit the ability of the SoCal Gas Company to provide service to the proposed Project. Points of connection to SoCal Gas Company main lines 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 construction of any off-site natural gas utility connections would occur within existing disturbed public rights-of-way. As such, the construction of these utility connections is evaluated under the appropriate subject headings within this EIR, and no new impacts would occur specifically related to natural gas service that have not already been addressed.

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 gas generation facilities, although some new distribution lines would be necessary (as discussed above). 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 gas service 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, including a series of catch basins, three separate drainage basins, and storm drain lines proposed throughout the site. Runoff tributary to and generated on the Project site ultimately would discharge into Goldenstar Creek. Proposed drainage improvements would



be located in on-site or off-site improvement areas, impacts to which 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 improvements to roadways abutting the Project site, including Chicago Avenue, Iris Avenue, and the proposed on-site roadways. These improved public roadways would require maintenance by Riverside County. Maintenance of the public roadways to be improved as part of the Project 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 WMWD's service area for water service and areas within the City of Riverside's wastewater system, and is based on the buildout of the Riverside County General Plan, the City of Riverside General Plan, and the general plans of other cities within WMWD's service area. The cumulative study area for solid waste comprises western Riverside County, as all areas of western Riverside County are served by the WMIE, and the cumulative analysis 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 the Project's construction



phase 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.

As analyzed under Threshold b., the WMWD anticipates that it would have a surplus of water supplies in relation to water demand through at least 2045. As previously noted, the Project's incremental increase in demand for water resources would consist of only 6.6% of the WMWD's excess capacity in 2020 and only 1.8% of WMWD's projected excess capacity in 2045. The WMWD UWMP evaluates the water demands of cumulative developments within WMWD's service area based on the adopted land use designations as identified by the County's General Plan and the general plans of other cities within WMWD's service area. While it is possible that other cumulative developments could involve General Plan amendments that could increase the water demand beyond the UWMP demand and supply projections, any such proposals would be subject to their own CEQA-compliance process and would be required to demonstrate that the increased demand can be accommodated by WMWD. Furthermore, consideration of any such potential future General Plan amendments would be speculative at this time (see CEQA Guidelines § 15145). Because the WMWD would have the capacity to serve the Project as well as future cumulative developments within its service area, cumulatively-considerable impacts to water supply would be less than significant.

The discussion under Threshold c. and d. indicates that a number of improvements to provide sewer service to the Project would be required, 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.

As also discussed under the analysis of Thresholds c. and d., although the Project would increase sewer flows requiring treatment by the RWQCP, the Project's incremental increase in demand comprises only 0.13% of the RWQCP's total daily capacity. As such, because adequate treatment capacity exists at the RWQCP to treat the Project's sewer flows, cumulatively-considerable impacts to wastewater treatment capacity would be less than significant.

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 disposal capacity at the El Sobrante Landfill, Lamb Canyon Landfill, and/or Badlands Landfill. The landfills are currently projected to remain open until as far into the future as 2059 (Badlands 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 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 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 would also 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.

Cumulative impacts associated with the provision of facilities for electricity, natural gas, communications systems, stormwater drainage, street lighting, maintenance of facilities, construction of off-site sewer and water lines, and other governmental services are 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 0.1% of the RWQCP's daily capacity. Accordingly, the Project would not result in or require the expansion of the existing facilities at the RWQCP, and impacts would be less than significant.

Threshold b.: Less-than-Significant Impact. Because the WMWD UWMP determined that the WMWD would have adequate supplies during normal, dry, and multiple dry years through at least 2045, the Project only has the potential to conflict with the UWMP projected supplies and demand based on the anticipated increase in the number of dwelling units proposed as part of the Project as compared to the number of dwelling units anticipated by the UWMP for the Project site. The Project would result in an increase in the number of dwelling units projected on site by 105 dwelling units, which would result in a net increase in demand of approximately 106.0 AFY (94,568 gpd). The Project's incremental increase in demand represents only 6.6% of WMWD's



excess capacity in 2020 and represents only 1.8% of WMWD's projected excess capacity in 2045. Thus, the Project's incremental increase in water demand would be accommodated by WMWD's existing and projected excess capacity. Because the UWMP demonstrates that the WMWD would have sufficient water supplies even during single and multiple dry years to meet the projected demand within its district through the year 2045, it can be concluded that the WMWD would have sufficient water supplies to serve the Project based on existing entitlements and resources. The Project also would not result in the construction or expansion of facilities, beyond the on-site and site adjacent improvements that are inherent to the Project's design and that already have been evaluated throughout this EIR. Impacts would be less than significant.

Thresholds c. and d.: 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. With respect to sewer treatment capacity, the Project's 53,360 gpd of wastewater would represent only approximately 0.13% of the RWQCP's total daily treatment capacity. Therefore, it can be concluded that the RWQCP would have adequate capacity to treat sewer flows generated by the Project, and the Project would not 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. Accordingly, because adequate treatment capacity exists at the RWQCP to treat the Project's sewer flows, Project impacts to wastewater treatment capacity would be less than significant.

Threshold e.: Less-than-Significant Impact. The Project's 0.26 tpd of solid waste would represent approximately 0.004% of the excess daily capacity at El Sobrante Landfill, approximately 0.01% of the excess daily capacity at the Badlands Landfill, and approximately 0.01% of the excess daily capacity at the Lamb Canyon Landfill. Because the Project would generate a relatively small amount of solid waste per day, as compared to the permitted daily capacities for the El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill, it is anticipated that these regional landfill facilities would have sufficient daily capacity to accept solid waste generated by the Project. Therefore, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, and would not otherwise impair the attainment of solid waste reduction goals, and 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. Arrangements can be made through the franchise hauler.
 - 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

Information in this Subsection is also based in part on a technical study for wildfire protection titled, “Arroyo Vista Development Fire Protection Plan” (herein, “FPP”), prepared by Firewise2000, LLC (herein, “Firewise”), dated April 27, 2023, and included as *Technical Appendix L1* to this EIR (Firewise, 2023). Additionally, information in this Subsection is based in part on an emergency evacuation technical memo titled, “Arroyo Vista Fire Evacuation Analysis – Technical Memorandum” (herein, “FEA”), prepared by CR Associates (herein, “CRA”), dated July 29, 2023, and included as *Technical Appendix L2* to this EIR (CRA, 2023). Refer to Section 7.0, *References*, for a complete list of reference sources.

4.21.1 EXISTING CONDITIONS

A. Fire Hazard Classification

Under existing conditions, the Project site consists of vacant and undeveloped land that was previously used for agricultural production, with an existing single-family residence occurring in the east-central portion of the Project site. Areas surrounding the Project site to the north, west, east, and south consist of undeveloped lands with natural vegetation along with numerous rural residential uses. According to Riverside County GIS, and as shown on Figure 4.21-1, *Wildfire Susceptibility*, the northwest corner of the Project site is classified as having a “Very High” susceptibility to wildland fire hazards, while the majority of the Project site is not identified as being susceptible to wildland fire hazards. Areas to the north, west, and south of the Project site, as well as lands immediately east of the northeast corner of the Project site, also are classified as having a “Very High” susceptibility to wildland fire hazards. The remaining areas to the east of the Project site as well as lands along the Van Buren Boulevard corridor are not identified as being susceptible to wildland fire hazards. (RCIT, n.d.)

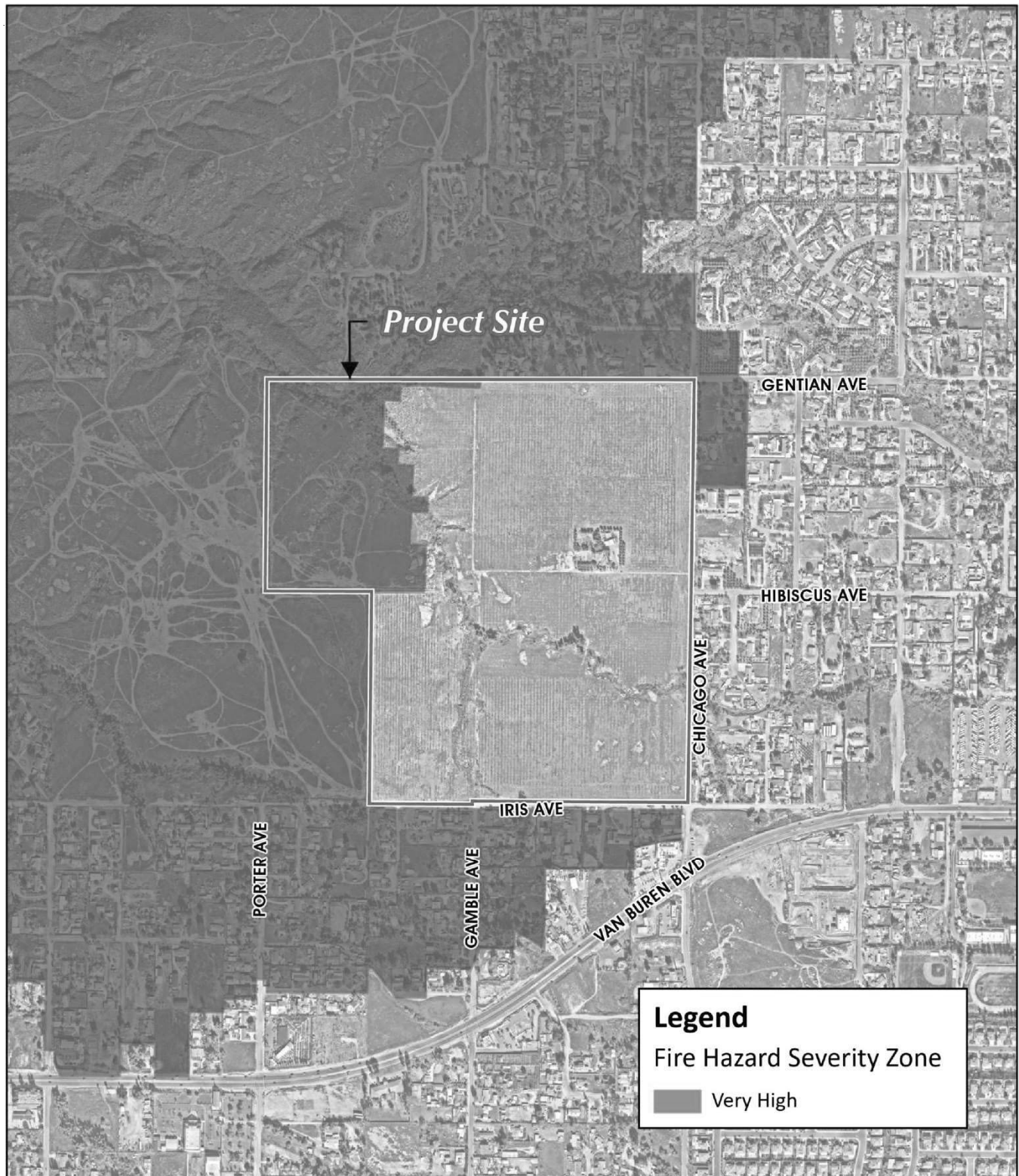
B. Topography

As previously shown on EIR Figure 2-7, the Project site exhibits undulating topography with elevations generally decreasing from southeast to northwest. A prominent drainage traverses the Project site in a northwesterly/southeasterly orientation, and runoff generated on a majority of the site sheet flows into this drainage. Elevations on site range from approximately 1,401 feet above mean sea level (amsl) at the northwest corner of the site to 1,579 feet amsl near the southeastern corner of the site. (Google Earth, 2021)

C. Climate

Weather has a dramatic influence on wildland fire behavior. The most critical weather pattern to the Project area is a hot, dry offshore wind, typically called a Santa Ana. Such wind conditions are usually associated with strong (>50 MPH), hot, dry winds with very low (<15%) relative humidity. Santa Ana winds originate over the dry desert land and can occur anytime of the year; however, they generally occur in the late fall (September through November). This is also when non-irrigated vegetation is at its lowest moisture content. Riverside County is one of the areas in southern California that is strongly influenced by powerful Santa Ana winds. (Firewise, 2023, p. 12)

Fire Agencies throughout the western United States rely on a sophisticated system of Remote Automated Weather Stations (RAWS) to monitor weather conditions and aid in the forecasting of fire danger. The closest



Source(s): Esri, NearMap Imagery (2023)

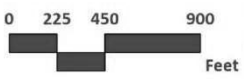


Figure 4.21-1 Wildfire Susceptibility



RAWS to the Project is the Clark RAWS. The Clark RAWS is located at an elevation of 1,720 feet at Latitude 33° 52' 36" and Longitude 117° 18' 32". This station is approximately 200 feet higher in elevation and located approximately 3.0 miles from the project. (Firewise, 2023, p. 13)

The typical prevailing summertime wind pattern is out of the west/southwest and normally is of a much lower velocity (5-10 MPH with occasional gusts to 20 MPH) and is associated with relative humidity reading ranging between 20% and occasionally more than 50% due to the sites proximity to onshore winds from the ocean.

In addition to Santa Ana winds, there is a historic pattern of wildland fires burning from the southwest to northeast. Every 5-10 years, a "rare event" hot dry, southwest to west wind of 30 MPH will occur. This moderately strong, dry wind condition usually occurs in the late afternoon or early evenings on very hot days, especially during the normal summertime (June through September) months.

All other (northwest, southeast and south) wind directions may be occasionally strong and gusty; however, they are generally associated with cooler moist air and have higher relative humidity (>40%). They are considered a serious wildland fire weather condition when wind speeds reach >20-MPH.

D. Vegetation

The Project site is located in lightly sloping terrain with short drainages with moderately steep slopes. An intermittent stream with associated trees and shrubs runs from the southeast to the northwest. Hillsides to the northwest consist of primarily undisturbed vegetation. The remaining portions of the Project site consist of the former orchards that once existed on site and that are in the process of returning to a more natural condition (as discussed below). (Firewise, 2023, p. 4)

As previously noted, a portion of the Project site is located in a designated Very High Fire Hazard Severity Zone (VHFHSZ), as shown on Figure 4.21-1. It should be noted that at the time fire hazard mapping was conducted for the Project area, nearly all the Project site was agricultural with a large citrus orchard being present. Thus, at the time of fire hazard mapping, the orchard did not present a wildland fire problem. The orchard has since been removed from the Project site. The site, if not disturbed, would over time grow back from seed disseminated from adjacent wildlands or lying dormant in the soil. The Riverside County Fire Department (RCFD) Strategic Planning Division would at some point in the future reevaluate the entire County wildland fire hazard and would at that time most likely change the Project site to either a high or a VHFHSZ designation. (Firewise, 2023, p. 3)

E. Fire History

There has been a history of a large wildland fire burning in the Project area. A large wildland fire is defined is one that burns over 100 acres. The fire history for the past 51 years for the Project and surrounding area are depicted on Figure 2 of the Project's FPP (EIR *Technical Appendix LI*). The most recent fire shown burned to the west of the Project site. Fire history data was obtained from Cal Fire. It should be noted that not all wildland fires are mapped. Fires of less than 100 acres are not shown unless they do significant damage or loss of life. It is likely that there were other wildland fires that have occurred, they just did not become large enough or very significant to be included in this data. (Firewise, 2023, p. 12)



F. Project Area Fire Risk Assessment

Wildfire risk is a measure of the chance of a fire starting, as determined by the presence and activity of causative agents. The fire hazard is the result of a combination of vegetation, topography, weather, and the threat of fire to life and property that create difficult and dangerous conditions. (Firewise, 2023, p. 3)

As previously noted, at the time fire hazard mapping was conducted for the Project area, nearly all the Project site was agricultural with a large citrus orchard being present. Thus, at the time of fire hazard mapping, the orchard did not present a wildland fire problem. The orchard has since been removed from the Project site. The site, if not disturbed, would over time grow back from seed disseminated from adjacent wildlands or lying dormant in the soil. The RCFD Strategic Planning Division would at some point in the future reevaluate the entire County wildland fire hazard and would at that time most likely change the Project site to either a high or a VHFHSZ designation. (Firewise, 2023, p. 3)

In assessing the wildland fire hazard to the proposed Project, it is necessary to consider plant succession and the climax plant communities. The fire behavior vegetation types described below, in the cardinal directions of north through west, are the most likely climax plant communities that will exist without human intervention and the ones utilized for planning purposes. Several of the descriptions include interior wildland fire exposures such as those that will exist along the intermittent streambed where undeveloped land abuts several interior lots. (Firewise, 2023, pp. 3-4)

The northern Project boundary abuts both developed and undeveloped land. Fuels on the nearby land to the north consist of a combination of Sage/buckwheat, grass, and weeds. The climax vegetation likely to exist along the northern exposure of the interior lots can be best described as moderate load, dry climate grass-shrub (70%) and sage/buckwheat (30%). Slopes in this area range up to 25 percent and uphill which increases fire behavior. Peak flame lengths along the northern Project boundary are estimated at 47.3 feet. (Firewise, 2023, pp. 5-6 and 15)

The eastern boundary of the Project abuts existing development (large-lot residential homes), which are not considered susceptible to wildland fire hazards. The worst-case vegetation types are likely to exist as climax vegetation along the west side of the existing large drainage that traverses the Project site that is subject to a wildland fire from the east. The likely fuels can be best described as sage/buckwheat (70%) and very high load, dry climate timber-scrub (30%). Hillside slopes within the existing drainage range from 15 to 35 percent. Peak flame lengths along the eastern Project boundary are estimated at 31.8 feet. (Firewise, 2023, pp. 6-8 and 15)

A large portion of the southern boundary of the Project site abuts Iris Ave, a paved roadway that extends from Chicago Avenue westward to Gamble Avenue for a distance of approximately a quarter of a mile. Beyond Gamble Avenue, the roadway narrows and eventually turns into a dirt roadway. Along this portion of Iris Ave, existing homes and development exist along the south side of the roadway. As a result, few wildland fuels remain as the existing property owners maintain their property. However, the southern portion of the westernmost portions of the Project site abut wildland fuels to the south. The land is currently lightly vegetated due to a combination of ATV use and drought. The dominant plants consist of grass, mustard, tumbleweed, and other herbaceous native and non-native species. The topography in this area is nearly level to downhill into the project with 10 percent slopes. The worst-case vegetation types likely to exist as climax vegetation



along the south side of the westernmost portions of the Project site is a combined fuel of moderate load, dry climate grass (70%) and low load, dry climate grass-shrub (30%). Peak flame lengths along the southern Project boundary are estimated at 24.4 feet. (Firewise, 2023, pp. 9-10 and 16)

The entire western project boundary abuts wildland fuels, although the repeated disturbance by ATVs has currently reduced wildland fuels and thus potential fire behavior but also increases the risk of a wildfire starting. The likely climax vegetation type is a combined fuel consisting of moderate load, dry climate grass-shrub (70%) and moderate load, dry climate grass-shrub (30%). The moderate load grass likely would occur following above average rainfall winters. Slopes range from level to 5 percent. Within the westernmost portions of the Project site, the most likely climax wildland vegetation consists of a combination of sage/buckwheat (80%) and very high load, dry climate timber-grass-shrub (20%). Slopes in this area range up to 45 percent within the drainage formed by the intermittent streambed. Peak flame lengths along the western Project boundary are estimated at 24.4 feet. (Firewise, 2023, pp. 11 and 16)

G. Critical Wildfire Concerns

The most critical weather pattern to the Project area is a hot, dry offshore wind, typically called a Santa Ana. Such wind conditions are usually associated with strong (60 MPH), hot, dry winds with very low (<15%) relative humidity. Santa Ana winds originate over the dry desert land and can occur anytime of the year; however, they generally occur in the late fall (September through November). This is also when non-irrigated vegetation is at its lowest moisture content. (Firewise, 2023, pp. 11-12)

The undeveloped areas adjacent to and within the Project site can contribute to a damaging wildland fire event. Any wind or topography driven wildfire burning under a northeastern (Santa Ana) wind to the north and east of the development or a wildfire burning under a typical southwestern wind to the west or south of the Project site can create a wildland fire hazard due to wind-blown embers. Wildland fires starting north of the Project site on a typical fire day with a southwest wind will burn away from the Project site and will generally not be a significant wildland fire hazard. A wildland fire starting to the west of the Project site on a Santa Ana wind event day also will burn away from the Project site. (Firewise, 2023, p. 12)

4.21.2 APPLICABLE ENVIRONMENTAL REGULATIONS

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

A. Wildland Fire Hazards Regulations and Plans

1. Federal Regulations

☐ Healthy Forests Restoration Act of 2003

On August 22, 2002, President Bush established the Healthy Forests Initiative, directing 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 new 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.)

2. State Regulations

☐ **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.)

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 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.)

☐ **PRC 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 a result of AB 398, California Global Warming Solutions Act of 2006, the fire prevention fee was suspended as of July 1, 2017. (CA Legislative Info, n.d.)

☐ **California Government Code (CGC) Section 51178**

This section specifies that 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 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.)



☐ California Code of Regulations (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.). (Westlaw, n.d.)

☐ 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 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. In addition, Section 701A.3.2, “New Buildings Located in Any Fire Hazard Severity Zone,” states: (BSC, n.d.)

“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.”

4.21.3 BASIS FOR DETERMINING SIGNIFICANCE

Section L of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to wildfire hazards, and includes the following threshold questions to evaluate the Project’s impacts due to wildfire hazards (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 risks, 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?

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

- a. If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, substantially impair an adopted emergency response plan or emergency evacuation plan;*
- b. If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, 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. If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, 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. If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, 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. If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, 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 standard Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts due to wildfire hazards.

4.21.4 METHODOLOGY

A. Fire Prediction Modeling

The BEHAVE 6.0.0 Fire Behavior Prediction and Fuel Modeling System developed by United States Department of Agriculture (USDA) is one of the best systematic methods for predicting wildland fire behavior. The BEHAVE Plus fire behavior computer modeling system is utilized by wildland fire experts nationwide. Wildland fire managers use the BEHAVE Plus modeling system to project expected fire intensity, rate-of-spread and flame lengths with a reasonable degree of certainty for use in Fire Protection Planning purposes. Firewise used the BEHAVE 6.0.0 Fire Behavior Prediction Model to make the fire behavior assessments for the proposed Project, as discussed below. (Firewise, 2023, p. 13)



Wildland fire behavior calculations have been projected for the hazardous vegetative fuels on the undeveloped areas that are located in proximity to proposed perimeter structures or structures within the Project exposed to wildland fuels. These structures have the highest exposure to radiant and convective heat and therefore the most hazard. These projections are based on scenarios that are “worst case” Riverside County fire weather assumptions in the vicinity of the Project site. (Firewise, 2023, p. 14)

Over the past decade, California and much of the Western United States has been experiencing increased fire behavior from what was typically seen in the past as documented by firefighters from multiple agencies. It is due in part to our warming climate, which frequently results in lower relative humidity over prolonged periods of time in turn resulting in lower moisture content in both living and dead wildland fuels. When fuels are drier, they burn hotter and are easier to ignite, especially on hot days as the fuel temperature is closer to its ignition temperature. The fire behavior calculation inputs for anticipated fuel moistures have been adjusted to account for climate change and thus, better represent “worst case” weather. The downward fuel moisture adjustment results in approximately a 5-foot increase in flame lengths in fuels that contain brush and related species. (Firewise, 2023, p. 14)

Five (5) scenarios are depicted in the Project’s FPP (EIR *Technical Appendix L*) for five (5) separate BEHAVE 6.0.0 Fire Behavior Prediction Model computer calculations of wildland fire hazards. All tables included in the FMP (refer to pages 15-17 of the Project’s FPP) display the expected Rate of Fire Spread (expressed in feet/minute), Flame Length (expressed in feet), and Fireline Intensity (expressed in British Thermal Units/foot/second) and include the calculation inputs used in the BEHAVE model. The tables also show the effect of fuel treatment on the Rate of Fire Spread, Flame Length, and Fireline Intensity following the completion of the required fuel treatments. (Firewise, 2023, pp. 14-17)

B. Fire Evacuation Analysis Methodology

1. Fire Evacuation Modeling Overview

Modeling potential evacuation traffic impacts requires that numerous assumptions be made to address many variables that will impact a real-life evacuation scenario, including the number of existing vehicles in the community; the number of project vehicles that will need to evacuate; the roadway capacities and whether enhancements are provided (e.g., extra lanes, lane widening, signaling intersections); the total number of intersections and how they will be operating; the final destination; the targeted evacuation area; the total mobilization time; vegetation communities; weather and wind; fire spread rates; humidity; topography; risk to homes; locations of ignitions and new fire starts; and lead time needed, etc. There are many hundreds or thousands of potential model scenarios, and every fire scenario poses variations that regularly change and are reassessed “real-time” during a wildfire. Agencies involved in implementing an evacuation order would not rely on a project-specific evacuation plan, but on situational awareness and wildfire pre-plans, which act as operational tools to provide high-level fire assessments and assets at risk, preferred evacuation approaches, and safety information to inform evacuation decision-making. (CRA, 2023, p. 1)

The analysis of fire evacuation presented herein is intended to present representative evacuation scenarios using the best available information, conservative assumptions, and the best available modeling technology. In an actual emergency, unified command would take into account numerous factors including fire location



and spread rates, wind speeds and direction, humidity, topography, fuel loading, emergency access routes, evacuation routes, shelter-in-place options, time needed to evacuate, and other variables, and would issue specific evacuation or shelter-in-place directives consistent with the process and protocols outlined in the County's Emergency Operations Plans and similar plans of other local agencies. During a wildfire, residents should comply with those directives from authorities and first responders conducting the evacuation or emergency response. The evacuation traffic model used herein is appropriate for planning and comparison purposes but would likely not be relied on by first responders and should not be relied on by residents in time of an emergency; however, it provides useful information that would be provided to agencies and emergency managers. (CRA, 2023, p. 1)

The roadway network and vehicle input assumptions also have been selected to simulate a "worst-case" evacuation scenario that would occur on a weekend when all Project residents and the surrounding community are at home when ordered to evacuate. This "worst-case" evaluation is not required by law. Nonetheless, CRA imposed a "worst-case" evaluation out of an abundance of caution. The assumptions that a mass evacuation would occur at on a weekend when all Project residents and the surrounding community are at home when the evacuation order is provided represents an extreme, worst-case condition. In an actual wildfire event, phased evacuation orders would be given to provide for a more orderly evacuation, and it is likely that fewer residents would be present onsite. (CRA, 2023, pp. 1-2)

Accordingly, given the highest probability wildfire scenarios that would result in evacuation, the perimeter populations in certain locations may be targeted for evacuation. This type of evacuation is consistent with management of recent wildfires throughout southern California and Riverside County, including the Palisades Fire in 2021, where the phased/surgical evacuation practice has been implemented with great success. (CRA, 2023, p. 2)

The evacuation analysis presented herein was performed for the Project to determine how long it would take for residents of the proposed Project and the surrounding communities to evacuate to nearby urban areas/freeway access in case of a fire emergency. Current evacuation practice typically targets the scope of the evacuation only to the area in immediate danger and placing a larger area on standby for evacuation. This practice allows for better evacuation operations, reduces gridlock, and reserves sufficient travel way for emergency vehicles. It is assumed that first responders or law enforcement will direct traffic at all major intersections during the evacuation process. (CRA, 2023, p. 2)

During the evacuation process, which can proceed aided by the roadside fuel modification zones and unexposed corridors, wildfire spread, and encroachment may be slowed by fire-fighting efforts that would likely include fixed wing and helicopter fire-fighting assets. Hand crews also would be deployed toward containment. None of the evacuation scenarios assumed counter-flow lanes, as these lanes are reserved for first responders, law enforcement, and fire fighters in case of unforeseen circumstances. Because the proposed Project consists of primarily residential land uses, the analysis assumes a weekend evacuation order, where all the residents are home, and that each household would take all their vehicles during an evacuation. (CRA, 2023, p. 2)



2. ***Evacuation Parameters***

☐ **Weekend Evacuation (100% Occupancy)**

CRA assumed that the evacuation would occur on the weekend when all residents are home and the parking lot associated with the Amos Temple Church, located immediately south of the Project site, is fully occupied. The assumption was that all residential and non-residential vehicles would participate in the evacuation. In an actual wildfire scenario, it is likely that fewer vehicles would be present on the Project site and within the surrounding communities when an evacuation order is given. Weekend Evacuation is the most conservative scenario, as this scenario assumes that all residents are at home and visitors/members/patrons/employees of nearby non-commercial land uses such as the Amos Temple Church or the Flat Top Bar and would evacuate with all available vehicles. (CRA, 2023, p. 5)

☐ **Primary Evacuation Routes**

Based upon review of previous fires, evacuation orders, and the Riverside Fire Severity Zone Map, it is assumed that evacuating vehicles would use the closest route to evacuate to a safe area. It is assumed that traffic evacuating from both the Project and nearby communities would use Van Buren Boulevard, Gardner Avenue, Sage Avenue, Sage Avenue, Porter Avenue, Gamble Avenue, Chicago Avenue, and other local roads to travel to more urbanized, fire-safe areas. This presents a worst-case scenario by assuming more traffic would utilize these roadways despite the other available options that may be employed in an actual evacuation scenario, such as shelter in place or targeted evacuation. Figure 4.21-2, *Evacuation Routes and Evacuation Area*, shows the evacuation routes and evacuation area within the study area. Detailed evacuation analysis information is provided in Attachment A to the Project's FEA (*Technical Appendix L2*). No contraflow lanes were assumed to provide access¹. Two-way travel was assumed, with evacuating vehicles traveling outbound to the Safe Zone. It is assumed that first responders or law enforcement will direct traffic at all major intersections during the evacuation process. Should evacuation managers determine that contraflow is preferred or necessary, evacuation capacity would increase while evacuation times would decrease. (CRA, 2023, p. 5)

☐ **Safe Zone**

Based on review of the County's fire history, fires have halted along areas adjacent to wildland fuels and have not historically progressed into the more densely urbanized, irrigated, and hardscaped areas. Thus, it is assumed that evacuees are considered to reach a safe area once they travel past an urbanized area (Washington Street to the west or Wood Road to the east). (CRA, 2023, p. 5)

¹ Contraflow or lane reversal involves directing traffic to use lanes coming from the source of a hazard to move people away from the hazard. Such a strategy can be used to eliminate bottlenecks in communities with road geometries that prevent efficient evacuations or to facilitate traffic flow out of a major urban area. Among the considerations in planning emergency contraflow are whether sufficient traffic control officers are available, potential negative impact on responding fire apparatus, access management, merging, exiting, safety concerns, and labor requirements. Contraflow configurations must be carefully planned based on on-site factors and should not be implemented in an ad-hoc fashion.

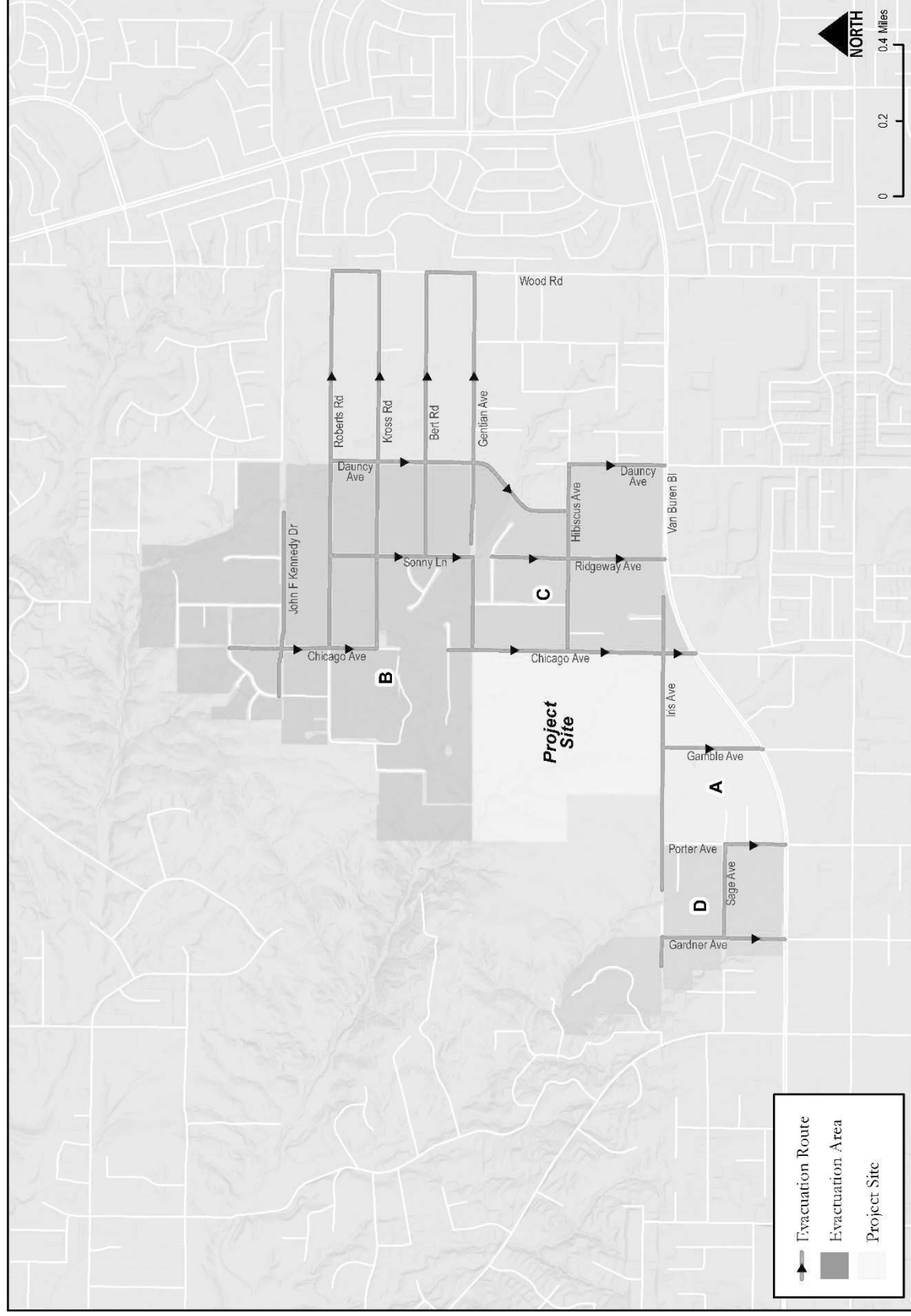


Figure 4.21-2 Evacuation Routes and Evacuation



☐ **Evacuation Scenarios Considered**

A total of five evacuation scenarios were considered as part of the Project's FEA (*Technical Appendix L2*), and are described below (CRA, 2023, pp. 5-6).

- **Evacuation Scenario 1: Existing Land Uses.** This scenario estimates the evacuation time for the existing land uses within the study area.
- **Evacuation Scenario 2: Proposed Project Only.** This scenario assumed full evacuation of the proposed Project.
- **Evacuation Scenario 3: Existing Land Uses with Proposed Project.** This scenario is similar to Evacuation Scenario 1, with the addition of the proposed Project traffic.
- **Evacuation Scenario 4: Existing Land Uses with Cumulative Projects.** This scenario is similar to Scenario 1 with the addition of cumulative traffic. Although the Project's Traffic Analysis ("TA"; EIR *Technical Appendix K2*) identified 28 cumulative projects in the City of Riverside, four projects within the County of Riverside, and 14 projects in the March Joint Power Authority, none of these projects share the same evacuation route as the proposed Project. Thus, for a conservative analysis and consistent with the traffic analysis, a 10.41% ambient growth was assumed for this scenario.
- **Evacuation Scenario 5: Existing Land Uses with Cumulative Projects and Proposed Project.** This scenario is similar to Scenario 4, with the addition of the proposed Project traffic.

☐ **Evacuating Vehicles**

The number of evacuating vehicles was calculated by taking the total number of residential units and multiplying it by the average vehicle ownership of each area, full occupancy of the Amos Temple Church parking lot, and Saturday May 13, 2023 parking counts for commercial centers within the evacuation area. Average vehicle ownership, residential units, and parking calculations are provided in Attachment A to the Project's FEA (*Technical Appendix L2*). Table 4.21-1, *Evacuating Vehicles*, displays the number of vehicles evacuating under each scenario. (CRA, 2023, p. 6)

Table 4.21-1 Evacuating Vehicles

Scenario	Number of Evacuating Vehicles					
	Nearby Land Uses (Area)				Project	Total
	A	B	C	D		
Scenario 1 – Existing Land Uses	342	740	450	430	0	1,962
Scenario 2 – Proposed Project Only	0	1	2	3	680	686
Scenario 3 – Existing Land Uses with Proposed Project	342	740	450	430	680	2,642
Scenario 5 – Existing Land Uses with Cumulative Projects	380	820	500	480	0	2,180
Scenario 6 – Existing Land Uses with Cumulative Projects with the proposed Project	380	820	500	480	680	2,860

(CRA, 2023, Table 1)



For purposes of analysis, it was assumed that five percent (5%) of the vehicles involved in evacuation would be heavy vehicles (trucks with trailers). This assumption was made to account for nearby agricultural and industrial land uses which may have a higher proportion of heavy vehicles compared to regular land uses. The assumption of five percent is considered conservative, because the nationally-accepted ratio of heavy vehicles to all vehicles is two percent and because there are no industrial land uses within the evacuation area. (CRA, 2023, p. 6)

☐ **Mass Evacuation**

A mass evacuation scenario was modeled in which all area residents would evacuate at the same time. This assumption presents a worst-case scenario as all traffic would be directed to the evacuation roadways at once. Mass evacuation events can overwhelm a roadway's capacity, which, when reaching a threshold traffic density, begins to decrease traffic flow. In an actual "real-life" wildfire event, a phased evacuation would be implemented where orders are given to evacuate based on vulnerability, location, and/or other factors, which reduces or prevents traffic surges on major roadways and improves traffic flow. The phased evacuation strategy also prioritizes the evacuation of residents in proximity to the immediate danger, giving emergency managers the ability to monitor the fire situation and decide in real time based on changing conditions whether to order additional evacuations as needed, or not. (CRA, 2023, p. 8)

☐ **Extreme Wildfire Event**

The evacuation analysis provided herein assumes a Santa Ana-wind driven fire from the north and/or east of the study area and travels in a westerly and southerly direction. This fire condition is the one most likely to require a large-scale evacuation, and the one that creates the most risk to property and humans. (CRA, 2023, p. 8)

In California, wildfire-related large-scale evacuations are almost exclusively associated with wildfires that occur on extreme fire weather days, also known as "Red Flag Warning" days. These days occur when relative humidity drops to low levels and strong winds from the north/northeast are sustained. With climate change, periods in which such wildfires occur may increase. During Red Flag Warning days, vegetation is more likely to ignite and fire spread is more difficult to control. In the greater Santa Clarita region, these extreme weather days typically occur during limited periods in the late summer, fall and, occasionally, in the spring, but may occur at other times on a less frequent basis. Currently, it is not common to experience more than 15 to 20 Red Flag Warning days in a typical year. Wildfires that occur during these periods of extreme weather are driven by winds, referred to as "Santa Ana" winds, that come from the north or east and blow toward the south or west. Fires driven by these winds move very quickly, making them difficult to control. In response to such fires, emergency managers typically activate pre-planned evacuation triggers that require down-wind communities to sequentially be notified to evacuate and move to nearby urbanized areas prior to the fire's encroachment. (CRA, 2023, p. 8)

Wildfires that occur on non-extreme weather days behave in a much less aggressive manner and pose fewer dangers to life and property because they include less aggressive fire behavior and are easier to control. Terrain and fuel are typically the wildfire drivers. During these non-extreme weather days, vegetation is much more difficult to ignite and does not spread fire as rapidly. In these situations, firefighters have a very high success



rate of controlling fires and keeping them under 10 acres. CALFIRE estimates that 90% of all vegetation fires occur during normal, onshore weather conditions and that such fires account for only 10% of the land area burned. Conversely, the 10% of wildfires that occur during extreme fire weather account for 90% of the land area burned. This data highlights that the most dangerous fire conditions are those related to a fire that moves rapidly due to high winds and low humidity, whereas under normal conditions fires are likely to be controlled with no evacuation or possibly limited extent, focused evacuations. (CRA, 2023, p. 8)

While it is possible that a fire driven by onshore wind (i.e., from the west) could require evacuation within the study area, such an event would be highly unusual. Moreover, due to the reduced fire behavior during normal weather periods, the evacuation would not be expected to be a large-scale evacuation of large areas. Instead, most of the population in the Project area would be anticipated to remain at their locations and within their communities, with a more targeted evacuation being ordered, if any. (CRA, 2023, pp. 8-9)

☐ **Evacuation Analysis Methodology**

The analysis methodology utilized the following equation for determining evacuation time (CRA, 2023, p. 9):

$$\text{Evacuation Time} = (\text{Evacuation Population} / \text{Average Vehicle Occupancy}) / \text{Roadway Capacity}$$

To analyze the evacuation events, CRA conducted simulations using Vissim, a microscopic, multimodal traffic flow modeling software used to simulate different traffic conditions. In Vissim simulations, roadway capacity is accounted for and each vehicle in the traffic system is individually tracked through the model and comprehensive measures of effectiveness, such as average vehicle speed and queueing, are collected on every vehicle during each 0.1-second of the simulation. This software enables drivers' behaviors during an evacuation to be replicated. A total of 20 simulations were conducted to yield a reasonable sample size to determine the performance of the study area roadways and impacts during evacuation scenarios. To be conservative, CRA assumed a worst-case scenario in which all vehicles belonging to households in the study area would be used in the evacuation, instead of the necessary number of vehicles needed to evacuate the impacted population. (CRA, 2023, p. 9)

☐ **Evacuation Analysis Threshold of Significance**

Although there are no established thresholds for determining whether evacuation times are safe, the Federal Emergency Management Agency (FEMA) has provided a general guideline for reasonable community evacuations of 90 minutes. Therefore, for purposes of analysis herein, a significant impact would occur if the Project were to cause or contribute to evacuation times exceeding 90 minutes.

4.21.5 IMPACT ANALYSIS

Threshold a.: *If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?*

According to mapping information available from the State Board of Forestry and Fire Protection, (BFFP) the Project site is located fully within a Local Responsibility Area (LRA) and is not located within or near a State



Responsibility Area (SRA) (BFFP, n.d.). The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area. During construction and long-term operation of the Project, adequate emergency access for emergency vehicles would be required to be maintained along public streets that abut the Project site. Furthermore, improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area, including planned improvements to Iris Avenue. Moreover, as part of the County's review process for future implementing developments (e.g., grading and building permits), Riverside County would review the Project's application materials to ensure that appropriate emergency ingress and egress would be available to-and-from the Project site and that circulation on the Project site is adequate for emergency vehicles. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

Although the Project is not anticipated to result in inadequate emergency access during construction or long-term operation and is not anticipated to conflict with any adopted emergency response plans or an emergency evacuation plans, under long-term conditions the Project does have the potential to cause or contribute to impacts associated with evacuation times in the local area during emergencies, in particular wildland fire hazards during a Santa Ana wind event. In order to evaluate the Project's potential to adversely affect emergency evacuation in the local area, a Project-specific FEA (*Technical Appendix L2*) was prepared. As previously noted, during evacuation from the Project site and surrounding areas vehicles most likely would utilize Van Buren Boulevard, Gardner Avenue, Sage Avenue, Sage Avenue, Porter Avenue, Gamble Avenue, Chicago Avenue, and other local roads to travel to more urbanized, fire-safe areas. Figure 4.21-2 (previously presented) shows the evacuation routes and evacuation areas for the Project site and the surrounding area. The time to evacuate under multiple scenarios was calculated via traffic simulations as part of the Project's FEA. These calculations assumed that the evacuation would occur at 100% occupancy of both the Project and the surrounding land uses, thus representing a "worst-case scenario" estimate. Table 4.21-2, *Evacuation Time Summary (All Scenarios)*, illustrates the evacuation time for each scenario evaluated (refer to the discussion in subsection 4.21.4.B, above, for a description of the five analysis scenarios presented in Table 4.21-2). (CRA, 2023, p. 9)

Although there are no established thresholds for determining whether evacuation times are safe, FEMA has provided a general guideline for reasonable community evacuations of 90 minutes. As shown in Table 4.21-2, with implementation of the Project, and when considering vehicular traffic from existing land uses and cumulatively-considerable development projects within the local area, the evacuation times would not exceed 90 minutes under any of the study scenarios. Table 4.21-2 shows that the Project would result in an increase in evacuation time by approximately 12 minutes (as shown in Table 4.21-2 for Scenario 3 and Evacuation Area B, which considers only the addition of Project traffic to existing traffic volumes). Additionally, when considering the addition of traffic from cumulative developments and traffic volumes from existing uses, the maximum evacuation time would be approximately 41 minutes for Evacuation Area B (refer to Figure 4.21-2), which is below the identified threshold of significance of 90 minutes and represents a cumulative increase of approximately 14 minutes. Therefore, because evacuation times in the study area with implementation of the Project and other cumulative land uses would not exceed the FEMA-identified threshold of significance of 90 minutes, Project impacts to evacuation routes during an emergency would be less than significant requiring no mitigation. (CRA, 2023, pp. 10-12)



Table 4.21-2 Evacuation Time Summary (All Scenarios)

Scenario	Total Evacuation Vehicles	Evacuation Time (Hours: Minutes)				
		Nearby Land Uses				Project
		A	B	C	D	
Scenario 1 – Existing Land Uses	1,962	0:21	0:27	0:24	0:13	N/A
Scenario 2 – Proposed Project Only	686	N/A	N/A	N/A	N/A	0:26
Scenario 3 – Existing Land Uses with Proposed Project	2,642	0:24	0:39	0:31	0:18	0:31
Scenario 4 – Existing Land Uses with Cumulative Projects	2,180	0:22	0:28	0:27	0:15	N/A
Scenario 5 – Existing Land Uses with Cumulative Projects with the proposed Project	2,860	0:25	0:41	0:33	0:20	0:31

(CRA, 2023, Table 2)

Threshold b.: *If located in or near a State Responsibility Area (“SRA”), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the Project, 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?*

Threshold e.: *If located in or near a State Responsibility Area (“SRA”), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the Project expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

As previously noted, the Project site is located fully within a Local Responsibility Area (LRA) and is not located within or near a State Responsibility Area (SRA) (BFFP, n.d.). Additionally, and as previously noted, the northwestern portion of the Project site is mapped as being within a VHFHSZ, while lands abutting the Project site from the immediate south, west, and north, as well as lands abutting the northern portion of the eastern Project site boundary, also are mapped as being within a VHFHSZ (RCIT, n.d.).

In order to evaluate the Project’s potential to exacerbate wildfire risks, a Project-specific FPP (EIR *Technical Appendix LI*) was prepared for the Project, the results and recommendations of which are discussed below. Refer to Section 2 of the Project’s FPP for a discussion of the methodology and computer software used to assess fire risks in the local area, and to Section 3 of the Project’s FPP for an assessment of potential structure ignitions in the wildland/urban interface.

Based on the results of the Project’s FPP, Firewise recommends implementation of Fuel Modification Zones (FMZs) between proposed development on site and open space areas subject to wildland fire hazards. The required FMZs generally consist of a minimum 100 feet from proposed structures on site, although in cases where the required 100-foot FMZ cannot be achieved additional construction features would be required. The combined effect of fuel treatment, and additional construction features where required, would mitigate for the



less than 100 feet of required FMZ, and would alleviate any radiant heat or direct flame impingement issues from the maximum projected 47.3-foot flame lengths from the north under the worst-case weather and fuel moisture scenarios. (Firewise, 2023, p. 20)

The area of greatest concern from a wildland fire perspective is in the northwest corner of the Project site where the most extreme fire behavior has been calculated. Firewise recommends that fuel treatment from a residence be at least 1.5 times the flame length which allows for unforeseen fire behavior. The minimum fuel treatment recommended is therefore 71 feet (1.5 X 47.3 feet). (Firewise, 2023, p. 20)

Basic fuel modification zones are shown on Figure 4.21-3, *Proposed Fuel Modification Plan*, and are described below. Figure 4.21-3 shows each of the fuel treatment zones that surround each home. It should be noted that on smaller lots or when located adjacent to the property lines, these zones may interlink or be required on the adjacent property to provide adequate protection. When fuel modification is restricted, additional building features likely would be required to provide an equivalent level of protection. Additionally, it should be noted that Project-specific fuel modification zones are subject to RCFD approval, conceptual, and subject to change. (Firewise, 2023, p. 20)

- **Fuel Modification Zone 0.** Zone 0, which is not depicted on Figure 4.21-3, encompasses 5 feet in width from proposed structures on site, and would be homeowner maintained. In Zone 0, the intent is to create a landscape absent of all combustible materials. This zone includes the area under and around all decks and requires the most stringent wildland fire fuel reduction and maintenance. This area would be kept clear of combustibles, plant based landscaping mulch, and all shrubs and trees. It may have a few plants, generally confined to pots or containers, that are low growing and nonwoody. No plants would be grown beneath windows or adjacent to doorways. Each plant would be properly irrigated and maintained and may include species such as sedges, lilies, and succulents. Plants that grow in water are also a good choice. Plastic garage and recycling containers should be placed outside this zone. Combustible fencing would not exist within the zone nor be attached to any structure. Firewood should be stored in Zone 2 (described below) or inside a fully enclosed storage shed. The soil surface may be bare ground or covered with hardscape features such as pavers, gravel, concrete, rock, or other non-combustible material. (Firewise, 2023, p. 22)
- **Fuel Modification Zone 1A.** Zone 1A, which is shown as no color on Figure 4.21-3, is an irrigated zone, beginning at the outer edge of Zone 0 and extending to the lot boundary or a minimum of 50 feet from a home, and would be maintained by individual homeowners. Commonly called the defensible space zone, Zone 1A would be free of all combustible construction and materials. It is measured from the exterior walls of the structure or from the most distal point of a combustible projection, an attached accessory structure, or an accessory structure located within 10 feet of a habitable structure. It provides the best protection against the high radiant heat produced by wildfire. It also provides a generally open area in which fire suppression forces can operate during wildfire events. This zone includes a level or level-graded area around the structure. For lots where the home is located more than 50 feet from the rear property line, the portion of the lot located over 50 feet of the home would be maintained to the criteria described below for Zone 2A. Zone 2A is a thinning zone that includes native vegetation. Irrigation is not required in Zone 2A. The Project's FPP also provides specifications for required landscaping and maintenance within Zone 1A. (Firewise, 2023, pp. 22-24)

IN THE COUNTY OF RIVERSIDE, CALIFORNIA

ARROYO VISTA FUEL MODIFICATION PLAN

TRACT MAP 38510

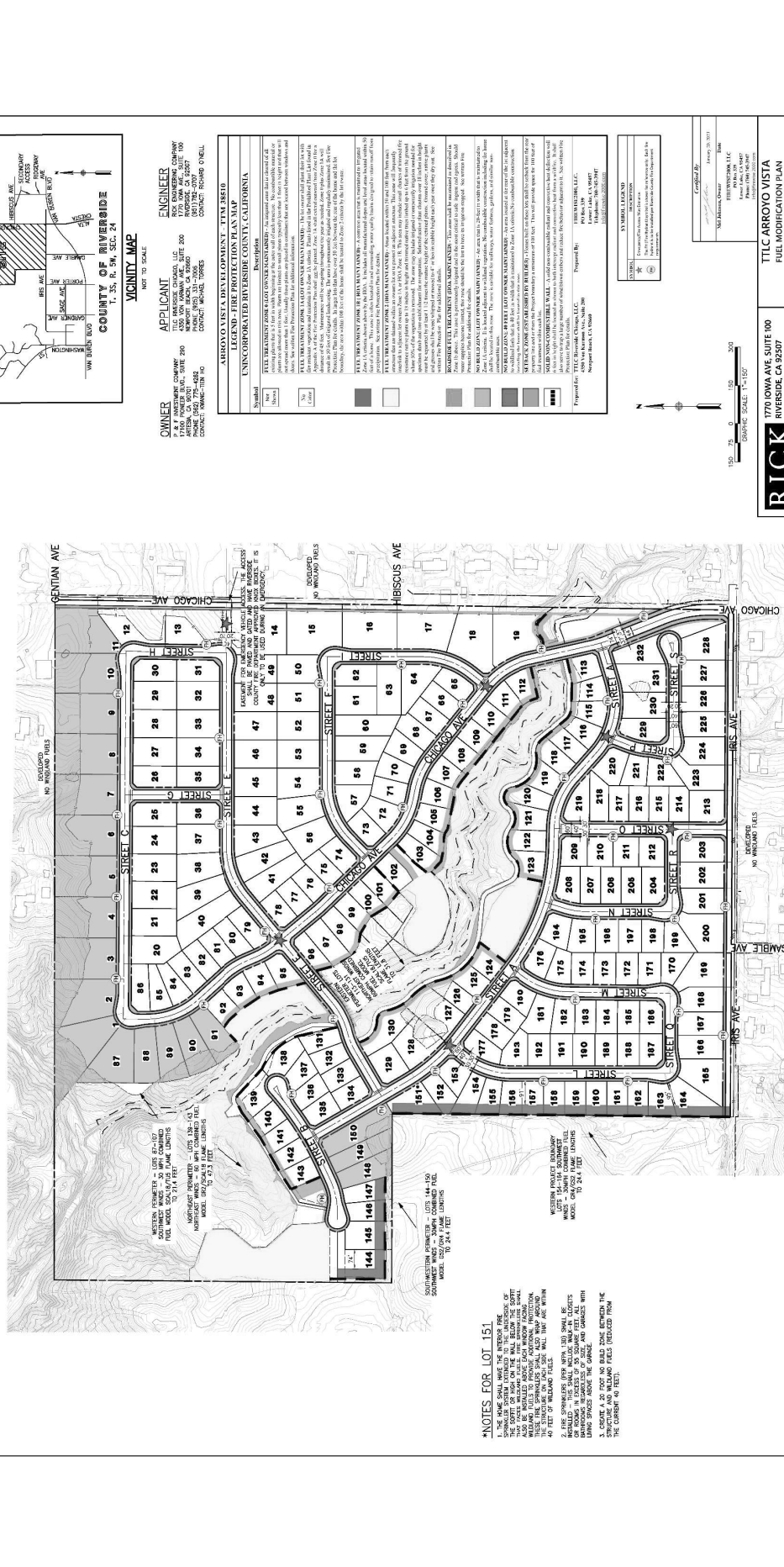


Figure 4.21-3 Proposed Fuel Modification Plan



- **Fuel Modification Zone 1B.** Zone 1B, which is shown in green on Figure 4.21-3, is an irrigated zone beginning at the outer edge of Zone 1A and is up to 50 feet in width that is permanently irrigated and maintained on graded land. Zone 1B includes all manufactured slopes and common areas where the Homeowners Association (HOA) would maintain the landscaping to the criteria described for Zone 1A. As shown on Figure 4.21-3, Zone 1B would extend into open space for a distance of 30 feet from the side or rear lot line. Landscaping and maintenance requirements are the same as specified for Zone 1A. (Firewise, 2023, p. 24)
- **Fuel Modification Zone 2.** Zone 2, which is shown in yellow on Figure 4.21-3, is often referred to as a thinning zone and consists of a non-irrigated area typically covered in wildland fuels but also includes debris basins and is designed to reduce any existing or future wildfire threat. Fuel management within Zone 2 would be conducted by the Project's HOA. Zone 2A would be located between 50 and 100 feet of any structure located within the development. This zone is designed to reduce the fuel load in native vegetation or vegetation growing in debris basins to reduce the radiant and convective heat of a wildland fire by reducing flame length, ember production, and slowing the rate of fire spread. Periodic maintenance of debris basins to remove sediments can also be utilized to maintain any encroaching vegetation. The Project's FPP also provides specifications for required landscaping and maintenance within Zone 2. (Firewise, 2023, pp. 25-26)
- **Roadside Fuel Treatment.** Roadside fuel treatment, which is shown in blue on Figure 4.21-3, would be maintained by the Project's HOA and would consist of the area located 20 feet on either side of any access road. Roadside fuel treatment areas would be landscaped and maintained to the same standards as identified in the Project's FPP for Zone 1A, or it shall be free of all vegetation. All of this zone is located in common areas, not within any residential lot. (Firewise, 2023, p. 26)
- **No Build Zone.** The No Build Zone, which is shown in pink on Figure 4.21-3, would be located adjacent to wildland fuels and within 20 feet of the rear or side yard lot line or would begin at the limits of grading as shown on Figure 4.21-3. The No Build Zone is an irrigated zone where no construction can occur, including the home. The lot owner would be required to perform the required Zone 1A Fuel Modification and combustible construction within this zone would be prohibited. This zone when combined with Zone 0, 1A, 1B and Zone 2A or 2B thinning located within the common area that is maintained by the HOA would result in 100 feet of fuel treatment for each home. When 100 feet of fuel treatment cannot be provided, additional construction features would be required. This area is suitable for recreational uses, gardens, pools, animal kennels, and similar features. The zone is needed to create a 20-foot wide space between the adjacent open space/channel and the structures. (Firewise, 2023, p. 26)
- **40-Foot No Build Zone.** The 40-Foot No Build Zone, shown in red on Figure 4.21-3, would be maintained by individual homeowners and would be located adjacent to wildland fuels and is located within 40 feet of the rear yard lot line as shown on Figure 4.21-3. The requirements within this zone are the same as those described for the No Build Zone (described above). (Firewise, 2023, p. 26)
- **Setback Zone.** The Setback Zone is shown in grey on Figure 4.21-3. On larger lots (i.e., Lots 1-11, 87-91, and 148-150 of proposed Tentative Tract Map [TTM] 38510, homes shall be constructed a



minimum of 100 feet from the rear lot boundary and or Project boundary. This space would provide an area for 100 feet of fuel treatment within each lot. These treatments would include FMZ Zones 0 and 1A. (Firewise, 2023, p. 26)

In addition to the FMZs described above, Section 6.0 of the Project's FPP (EIR *Technical Appendix L1*) also includes a variety of standards related to construction. The standards require that all homes located along the perimeter and exposed to wildland fuels shall be located a minimum of 20 feet from the rear and in several cases also the side yard property line where no combustible construction would be allowed. The standards further require that all construction and ignition resistant requirements shall meet the 2022 California Fire and Building Code, and Chapter 7A of the California Building Code or the current codes in force at the time of building permit application. A description of the current construction requirements is provided as Appendix D to the Project's FPP. The construction standards further require that all non-habitable accessory structures such as decks, balconies, patios, covers, gazebos, and fences shall be built from non-combustible materials. Additional standards are identified related to pre-construction requirements, construction requirements (including construction requirements specific to certain lots adjacent to wildland fuels). (Firewise, 2023, p. 27)

Section 7.0 of the Project's FPP (EIR *Technical Appendix L1*) identifies recommended measures for inclusion in the Project's homeowners association's Covenants, Conditions, and Restrictions (CC&Rs), while Section 8.0 of the Project's FPP identifies standards and requirements related to infrastructure, including water supply; roads/driveways and gates; and fire protection access ways/fuel modification maintenance. Section 9.0 of the Project's FPP identifies requirements related to education for future homeowners on site. (Firewise, 2023, pp. 29-33)

As concluded by the Project's FPP (EIR *Technical Appendix L1*), implementation of the requirements identified by the FPP would provide the fuel treatment standards required to mitigate the exposure of people or structures to a significant risk of loss, injury, or death. The FMZs would provide 100 feet of fuel treatment that includes a defensible space zone for fire suppression forces and will protect structures from radiant and convective heat. These zones would consist of a combination of landscaped zones that are permanently irrigated and consists of fire resistant and maintained plantings and thinning zones. The maintenance requirements include the removal of all prohibited highly combustible native vegetation but permit plantings with very specific criteria. Thus, with implementation of the Project's FPP, Project impacts due to slope, prevailing winds, and other factors that could exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be reduced to less-than-significant levels. Additionally, with implementation of the Project's FPP, the Project would not expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and impacts would be less than significant.

However, in the event that the recommendations of the Project's FPP are not implemented, the Project could result in the exposure of Project occupants to wildfire-related pollutant concentrations and/or could results in the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires. This is conservatively evaluated as a significant impact for which mitigation would be required.

Threshold c.: *If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the*



Project 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 previously noted, the Project site is located fully within a Local Responsibility Area (LRA) and is not located within or near a State Responsibility Area (SRA) (BFFP, n.d.). Additionally, and as previously noted, the northwestern portion of the Project site is mapped as being within a VHFHSZ, while lands abutting the Project site from the immediate south, west, and north, as well as lands abutting the northern portion of the eastern Project site boundary, also are mapped as being within a VHFHSZ (RCIT, n.d.).

The Project's FPP identifies a variety of measures to reduce wildland fire hazard risks at the Project site, including recommended FMZs, construction standards, recommended CCRs, and recommended provisions related to infrastructure. Compliance with the recommendations of the Project's FPP (EIR *Technical Appendix LI*), which is described in detail under the discussion and analysis of Threshold b., would ensure that the Project does not exacerbate fire risks in the local area. However, the Project could result in increased fire risks in the local area if the recommendations of the Project's FPP are not implemented. This is evaluated as a significant impact for which mitigation would be required.

The Project's required FMZs were previously depicted on Figure 4.21-3, and requirements related to landscaping and maintenance of the FMZs are presented in Section 5.0 of the Project's FPP (EIR *Technical Appendix L*). As shown on Figure 4.21-3, the Project's FMZs would require on-going maintenance, including on-going thinning of vegetation, that could result in significant environmental effects, particularly to biological resources. However, impacts associated with Project implementation, including implementation of the recommended FMZs, are evaluated within appropriate subject headings throughout this EIR (e.g., Section 4.4, *Biological Resources*), and in all cases impacts were determined to be less than significant, or would be reduced to less-than-significant levels with the implementation of mitigation measures. Accordingly, the Project's proposed FMZs and other requirements specified in the Project's FPP would not result in any temporary or ongoing impacts to the environment that are not already addressed by this EIR, and impacts would therefore be less than significant.

Threshold d.: If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the Project 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?

As previously noted, the Project site is located fully within a Local Responsibility Area (LRA) and is not located within or near a State Responsibility Area (SRA) (BFFP, n.d.). Additionally, and as previously noted, the northwestern portion of the Project site is mapped as being within a VHFHSZ, while lands abutting the Project site from the immediate south, west, and north, as well as lands abutting the northern portion of the eastern Project site boundary, also are mapped as being within a VHFHSZ (RCIT, n.d.).

As discussed under the analysis of Thresholds b. and e., the Project's FPP (EIR *Technical Appendix LI*) identifies a variety of measures to reduce wildland fire hazard risks at the Project site, including recommended FMZs, construction standards, recommended CCRs, and recommended provisions related to infrastructure. Implementation of the measures detailed in the Project's FPP would reduce the risk of wildfire in the local area



and would improve the ability of firefighters to fight fires on the properties and protect property and neighboring resources, irrespective of the cause or location of ignition. Although during extreme fire conditions there still would remain a potential for wildland fires to affect future buildings on site, implementation of the required enhanced construction features provided by the applicable codes and the fuel modification requirements specified by the Project's FPP would reduce the site's vulnerability to wildfire to less-than-significant levels.

Based on the site's hydrologic conditions, the Project site would not be subject to flood hazards associated with fire events, and with development of the site runoff on the site would be controlled by the Project's proposed drainage system, thereby precluding fire-related flooding impacts downstream. There are no prominent hillsides in areas surrounding the Project site that could be subject to mass wasting (landslides) in the event of a wildfire, and the Project's Geotechnical Update (EIR *Technical Appendix FI*) indicates that there are no evidence of landslides in the local area (GeoTek, 2021, p. 10). 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.

4.21.6 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. Moreover, Table 4.21-2 shows that under cumulative conditions evacuation times in the local area would increase by approximately 14 minutes, resulting in a worst-case evacuation time of 41 minutes within Evacuation Area B under cumulative Scenario 5. The resulting evacuation time would be well below the FEMA-identified threshold of significance of 90 minutes. As such, cumulatively-considerable impacts due to a conflict with emergency response plans or emergency evacuation plans, and due to increased evacuation times during an emergency, would be less than significant.

As indicated under the discussion of Thresholds b. and e., future development on site would comply with the fire abatement requirements specified by the Project's FPP (EIR *Technical Appendix LI*), which includes the provision of FMZs, construction standards, recommended CCRs, and recommended provisions related to infrastructure. Compliance with the requirements of the Project's FPP would ensure that the Project does not exacerbate wildfire hazards or 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. However, a cumulatively-considerable impact could occur if the Project did not implement the recommendations of the Project's FPP. This is evaluated as a potentially significant impact on a cumulatively-considerable basis.



As discussed under the analysis of Threshold c., the Project's required FMZs were previously depicted on Figure 4.21-3, and requirements related to landscaping and maintenance of the FMZs are presented in Section 5.0 of the Project's FPP (EIR *Technical Appendix LI*). As shown on Figure 4.21-3, the Project's FMZs would require on-going maintenance, including on-going thinning of vegetation, that could result in significant environmental effects, particularly to biological resources. However, impacts associated with Project implementation, including implementation of the recommended FMZs, are evaluated within appropriate subject headings throughout this EIR (e.g., Section 4.4, *Biological Resources*), and in all cases impacts were determined to be less than significant, or would be reduced to less-than-significant levels with the implementation of mitigation measures. Other cumulative developments would similarly be required to address potential on-going impacts to the environment associated with fuel protection measures. Thus, with the mitigation measures presented throughout this EIR to address cumulatively-considerable impacts, the Project's cumulatively-considerable impacts due to the installation or maintenance of fire protection infrastructure would be less than significant.

As indicated under the discussion of Threshold d., with implementation of the Project's FPP (EIR *Technical Appendix LI*) the risk of wildfire hazards occurring on the Project site would be substantially reduced. Additionally, Project-related runoff, including runoff following fire events, would be controlled by the Project's proposed drainage system, which includes bioretention basins to preclude a substantial increase in the rate of runoff. There are no components of the Project that would result in increased potential for landslides, including during fire events. Thus, cumulatively-considerable impacts due to 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, would be less than significant.

4.21.7 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a: Less-than-Significant Impact. The Project site and surrounding areas are not identified as evacuation routes, and there are no adopted emergency response plans or emergency evacuation plans applicable to the Project area. During construction and at Project build-out, the Project would be required to maintain adequate access for emergency vehicles. Additionally, the Project alone only would increase evacuation times in the local area by up to a maximum of 12 minutes, evacuation times only would increase by a maximum of 14 minutes under cumulative conditions, and the Project would not cause or contribute to evacuation times exceeding the FEMA-identified threshold of 90 minutes under either Project only or cumulative conditions; thus, Project impacts to evacuation routes during an emergency would be less than significant requiring no mitigation. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan. Impacts would be less than significant.

Thresholds b. and e.: Significant Direct and Cumulatively-Considerable Impact. Future development on site would comply with the fire abatement requirements specified by the Project's FPP (EIR *Technical Appendix LI*), which includes the provision of FMZs, construction standards, recommended CCRs, and recommended provisions related to infrastructure. However, in the event that the recommendations of the Project's FPP are not implemented, the Project could result in the exposure of Project occupants to wildfire-related pollutant concentrations and/or could result in the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires. This is evaluated as a significant direct and cumulatively-considerable impact for which mitigation would be required.



Threshold c: Less-than-Significant Impact. The Project's FMZs would require on-going maintenance, including on-going thinning of vegetation, that could result in significant environmental effects, particularly to biological resources. However, impacts associated with Project implementation, including implementation of the recommended FMZs, are evaluated within appropriate subject headings throughout this EIR (e.g., Section 4.4, *Biological Resources*), and in all cases impacts were determined to be less than significant, or would be reduced to less-than-significant levels with the implementation of mitigation measures. Accordingly, the Project would not exacerbate fire risk, and would not result in temporary or ongoing impacts to the environment beyond what is already evaluated and disclosed by this EIR. Impacts would be less than significant.

Threshold d: Less-than-Significant Impact. Although during extreme fire conditions there still would remain a potential for wildland fires to affect future buildings on site, implementation of the recommendations of the Project's FPP (EIR *Technical Appendix L1*) and applicable fire-related regulatory requirements would reduce the site's vulnerability to wildfire to less-than-significant levels. Additionally, with development of the site runoff on the site would be controlled by the Project's proposed drainage system, thereby precluding fire-related flooding impacts downstream. In addition, the Project site would not cause or be affected by fire-induced landslides. 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.

4.21.8 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

- MM 4.21-1 Prior to issuance of building permits, the Riverside County Fire Department (RCFD) shall review the proposed building plans to ensure compliance with the recommendations included in the Project's Fire Protection Plan (FPP), entitled, "Arroyo Vista Development Fire Protection Plan" (herein, "FPP"), prepared by Firewise2000, LLC, dated April 27, 2023, and included as *Technical Appendix L1* to the Project's Environmental Impact Report (SCH No. 2023030118). The review shall specifically ensure that the building plans incorporate all of the applicable "Construction Standards" requirements identified in Section 6.0 of the Project's FPP, as well as all of the applicable "Infrastructure" requirements identified in Section 8.0 of the Project's FPP.
- MM 4.21-2 Prior to final building inspection, the Project Applicant shall provide the Riverside County Fire Department (RCFD) with a copy of the Project Homeowners Association's (HOA) proposed Covenants, Conditions, and Restrictions (CC&Rs). The Project's CC&Rs shall incorporate all requirements of the Project's Fire Protection Plan (FPP), entitled, "Arroyo Vista Development Fire Protection Plan" (herein, "FPP"), prepared by Firewise2000, LLC, dated April 27, 2023, and included as *Technical Appendix L1* to the Project's Environmental Impact Report (SCH No. 2023030118). The CC&Rs shall specifically include requirements related to maintenance of the Project's Fuel Management Zones (FMZs), including identification of maintenance requirements for individual homeowners as well as maintenance requirements to be implemented by the Project's HOA. The review also shall ensure that all of the measures recommended in Section 7.0 (Mandated Inclusion in the CC&R's) of the Project's FPP have



been included in the Project's CC&Rs. The Project's CC&Rs also shall require that any future sales of homes to subsequent homeowners also shall require review of the Project's FPP and a signed copy of the Project's FPP shall be included in any subsequent escrow documents. The CC&Rs shall further provide that each year prior to the onset of fire season, the HOA shall provide the lot owners with information regarding wildfire mitigation efforts necessary for community fire safety that are contained within the Project's FPP.

- MM 4.21-3 Prior to the sale of any proposed residences within the Project, a copy of the Project's Fire Protection Plan" (herein, "FPP"), prepared by Firewise2000, LLC, dated April 27, 2023, and included as *Technical Appendix LI* to the Project's Environmental Impact Report (SCH No. 2023030118), shall be made available to all potential homebuyers, and all perspective homebuyers shall be provided with education materials related to fire safety, as identified in Section 9.0 of the Project's FPP. Additionally, a copy of the Project's FPP shall be included as part of any future sales agreement, and future homeowners shall be required to sign a copy of the FPP as part of their escrow papers acknowledging the requirements, restrictions, and responsibilities outlined in the Project's FPP. The signed copy of the FPP shall be included in the escrow papers.

4.21.9 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Thresholds b. and c.: Less-than-Significant Impact with Mitigation Measures Incorporated. Implementation of Mitigation Measures MM 4.21-1 through MM 4.21-3 would ensure full compliance with the Project's FPP. Specifically, Mitigation Measure MM 4.21-1 would ensure that all structures constructed on the Project site comply with the FPP recommendations related to "Construction Standards" and "Infrastructure," pursuant to Sections 6.0 and 8.0 of the Project's FPP, respectively. Mitigation Measure MM 4.21-2 would ensure that the Project's CC&Rs incorporate the recommended measures from the Project's FPP related to maintenance of the FMZs and as specified in Section 7.0 (Mandated Inclusion in the CC&R's) of the Project's FPP. Mitigation Measure MM 4.21-2 also would ensure that the Project's CC&Rs include measures requiring subsequent homebuyers within the proposed development to acknowledge the responsibilities set forth in the Project's FPP, would ensure that educational materials related to fire safety are distributed to all future homeowners, and would ensure that the CC&Rs require the Project's HOA to provide the lot owners with information regarding wildfire mitigation efforts necessary for community fire safety. Mitigation Measure MM 4.21-3 would ensure that all future homebuyers associated with the Project would be required to review and acknowledge the homeowner responsibilities identified by the Project's FPP for on-going maintenance. With full compliance with the Project's FPP, as would be assured with implementation of Mitigation Measures MM 4.21-1 through MM 4.21-3, would ensure that the Project does not exacerbate fire risk or expose future Project occupants to substantial wildfire-related pollutant concentrations and would ensure that the Project does not result in the exposure of people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Thus, with implementation of the required mitigation, Project impacts would be reduced to less-than-significant levels.



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:

- 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 231 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 Greenhouse 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 CAR-04, CAR-05, CAR-08, CAR-10, and CAR-13-1, 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.

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. As more fully documented in EIR Subsection 4.6, *Energy*, the Project would avoid the inefficient, wasteful, and unnecessary consumption of energy during Project construction, operation, maintenance, and/or removal. 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 the residential uses proposed as part of the Project are not associated with the generation or transport of hazardous materials or substances. 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 State 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 (State 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 residential development. The Project's construction-related employees and operational-related residents and 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 caused by introducing new residents 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 the Southern California Association of Governments (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.

The area surrounding the Project site is primarily characterized by rural residential uses, with higher-density residential uses and commercial uses occurring to the south of the Project site along Van Buren Boulevard. Development of the Project site with residential land uses would not directly induce surrounding properties to develop, because large portions of the area surrounding the Project site already are developed with residential uses, or are planned for long-term development with rural residential uses. Accordingly, the growth-inducing impacts of the Project would be less than significant. The Project is not expected to induce growth of land uses changes on the other parcels in the vicinity, as other lands surrounding the site are either already developed or planned to be developed consistent with their General Plan land use designations.

Furthermore, the proposed Project's improvements to the public infrastructure, including roads, drainage infrastructure, and other utility improvements are consistent with Riverside County's General Plan and would not indirectly induce substantial and unplanned population growth in the local area.

5.4 EFFECTS FOUNDS 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 State 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 EIR Section 4.0, *Environmental Analysis*, the proposed Project would result in significant adverse environmental effects that cannot be mitigated to below levels of significance after the implementation of Project design features, mandatory regulatory requirements, and feasible mitigation measures. The unavoidable significant impacts are:

- 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 231 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 Greenhouse 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 Tribal Cultural Resource (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.

6.1 ALTERNATIVES UNDER CONSIDERATION

CEQA Guidelines § 15126.6(e) requires that an alternative be included that describes what would reasonably be expected to occur on the property 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 development projects that include a revision to an existing land use plan, the "no project" alternative is considered to be the continuation of the existing land use plan into the future. For projects other than a land



use plan, such as 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 § 15126.6(e)(3)(A-B). For the alternatives analysis in this EIR, the potential scenario where the Project site remains in its current undeveloped condition is considered to be the “No Development Alternative (NDA),” while the potential scenario where the existing General Plan land use plan is implemented is considered to be the “No Project Alternative.”

The following scenarios are identified by the County of Riverside as potential alternatives to implementation of the proposed Project. The High Density Residential Alternative (HDRA) is considered the Environmentally Superior Alternative pursuant to State CEQA Guidelines § 15126.6.

6.1.1 NO DEVELOPMENT ALTERNATIVE

The No Development Alternative (NDA) considers no development on the Project site beyond that which occurs under existing conditions. As such, the Project site would continue to consist of 140.8 acres of disturbed land, with a single-family residence occurring in the central portion of the site. 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.

6.1.2 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 87.6 acres of the Project site, a sewer lift station on approximately 0.2-acre, water quality basins on 4.9 acres, open space on 23.82 acres, and roadways on 24.27 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.

6.1.3 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, FGPA’s are required for



any change from the “Rural Community” Foundation Component to the “Community Development” Foundation Component, and FGPA’s 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.

6.2 ALTERNATIVES CONSIDERED AND REJECTED

An EIR 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 § 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 proposed Project, CEQA Guidelines § 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, a number of possible alternatives were initially considered and, for a variety of reasons, rejected. Alternatives were rejected because either: 1) they could not accomplish the basic objectives of the Project, 2) they would not have resulted in a reduction of significant adverse environmental impacts, and/or 3) they were considered infeasible to construct or operate. A summary of the alternatives that were considered but rejected are described below.

6.2.1 ALTERNATIVE SITES

CEQA does not require that an analysis of alternative sites always be included in an EIR. However, if the surrounding circumstances make it reasonable to consider an alternative site then this alternative should be considered and analyzed in the EIR. In making the decision to include or exclude 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 § 15126.6(f) (2)).

Based on a review of aerial photography, the Riverside County General Plan land use map and a list of approved/pending development proposals within Riverside County and nearby jurisdictions, there are no other available, undeveloped properties of similar size (i.e., approximately 140.8 acres) that are zoned for and adjacent to other properties designated for residential development and that would reduce or avoid the Project’s significant and unavoidable impacts. For example, a different site location would merely shift the Project’s unavoidable impacts due to VMTs to a different location, and it is likely that similar or more severe near-term impacts could occur at off-site locations if the Project were instead to be developed in an area with a more balanced ratio of jobs and housing. For these reasons, Riverside County finds that evaluation of an alternative



site location is not required for the Project because alternative site locations would not reduce or avoid the Project's significant environmental effects.

6.2.2 AGRICULTURAL RESOURCES AVOIDANCE ALTERNATIVE (ARAA)

The Agricultural Resources Avoidance Alternative (ARAA) would entail development of residential and related uses on the +/-31.0 acres of the Project site that are not classified as comprising "Prime Farmland," "Farmland of Statewide Importance," "Unique Farmland," or "Farmland of Local Importance" (herein, "Important Farmlands"). However, and as previously shown on Figure 4.2-1, *FMMP Farmland Map*, the only portions of the Project site that do not contain Important Farmlands occur in the northwestern-most corner of the Project site. As previously shown on EIR Figure 4.4-1, *Vegetation Map*, and Figure 4.4-3, *Jurisdictional Impact Map*, the northwestern corner of the Project site contains the most sensitive biological habitats, including areas containing southern willow scrub habitat, as well as a significant portion of the on-site jurisdictional drainages. The existing biological constraints affecting this portion of the Project site would render development with residential uses in this area infeasible, as the mitigation required for impacts to biological habitat would be cost prohibitive and development within this portion of the Project site likely would not be supported by the California Department of Fish and Wildlife (CDFW) or the Santa Ana Regional Water Quality Control Board (RWQCB). In addition, the No Development Alternative (NDA), as discussed herein in subsection 6.3.1, already would serve to avoid the Project's significant and unavoidable impacts to agricultural resources. As implementation of the NDA also would completely avoid the Project's impacts to agricultural resources, consideration of a separate Agricultural Resources Avoidance Alternative would be duplicative and unnecessary, and therefore has been rejected from detailed consideration as part of this EIR.

6.2.3 TRIBAL CULTURAL RESOURCES AVOIDANCE ALTERNATIVE

The Tribal Cultural Resources Avoidance Alternative would entail avoiding identified Tribal Cultural Resources (TCRs) as part of the design and development of the Project site in order to reduce or eliminate the Project's significant and unavoidable impacts to TCRs. However, tribal consultation between Riverside County and the Tribes (Pechanga Band of Indians and Soboba Band of Luiseño Indians) determined the presence of a TCR landscape, as defined by California Public Resources Code Section 21074.2. The TCR landscape includes, but is not limited to, the Project site. Although the Project would avoid 14.46 acres of the 16.39 acres of identified tangible cultural resources site on the Project site (representing 89% of the overall areas of the Project site containing cultural resources deposits), and although the Project would implement mitigation measures to reduce to less-than-significant levels the Project impacts to Sites P-33-12915/CA-RIV-7181, P-33-12916/CA-RIV-7182, as well as Project impacts due to the relocation of CAR-04, CAR-05, CAR-08, CAR-10, and CAR-13-1, because the TCR landscape encompasses the entirety of the Project site, any development on site would result in significant and unavoidable impacts to the TCR landscape. The No Development Alternative (NDA), discussed herein in subsection 6.3.1, already considers leaving the Project site in its existing condition. As implementation of the NDA also would completely avoid the Project's impacts to the TRC landscape, consideration of a separate TCR Landscape Avoidance Alternative would be duplicative and unnecessary, and therefore has been rejected from detailed consideration as part of this EIR.



6.3 ALTERNATIVE ANALYSIS

The following discussion compares the impacts of each alternative considered by the Lead Agency with the impacts of the proposed Project, as detailed in EIR Subsection 4.0, *Environmental Analysis*. A conclusion is provided for each impact as to whether the alternative results in one of the following: (1) reduction or elimination of the proposed Project's impact, (2) a greater impact than would occur under the proposed Project, (3) the same impact as the proposed Project, or (4) a new impact in addition to the proposed Project's impacts. Table 6-1, *Alternatives to the Proposed Project -Comparison of Environmental Impacts*, located at the end of this Section, compares the environmental hazard and resource impacts of the alternatives with those of the proposed Project and identified the ability of the alternative to meet the basic objectives of the Project. As described in EIR Subsection 3.4, 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.
- C. To develop a residential community with a design that takes topographic, geologic, hydrologic, and environmental opportunities and constraints into consideration.
- D. 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.
- E. To assist Riverside County in meeting its Regional Housing Needs Assessment (RHNA) allocation by developing low density residential uses.
- F. 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.

6.3.1 NO DEVELOPMENT ALTERNATIVE

The No Development Alternative (NDA) considers no development on the Project site beyond that which occurs under existing conditions. As such, the Project site would continue to consist of 140.8 acres of disturbed land, with a single-family residence occurring in the central portion of the site. 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.



A. Aesthetics

The NDA considers no development or disturbance on the Project site beyond that which occurs under existing conditions. As such, the 140.8-acre site would remain undeveloped with one single-family residence on the site. Thus, the Project's less-than-significant impacts to scenic vistas would be avoided under this Alternative. 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 NDA would retain the site's existing visual character and impacts would be reduced in comparison to the Project. The Project site is located outside of areas subject to Ordinance No. 655; thus, no impacts due to a conflict with Ordinance No 655 would occur with implementation of the proposed Project or NDA, and impacts would be similar. The Project site is not visible from any officially-designated or eligible State or County scenic highways; thus, no impacts to scenic highway corridors would occur and impacts would be similar to the proposed Project. Although the Project would result in less-than-significant light and glare impacts, no new lighting sources or sources of potential glare would occur on site under the NDA: thus, impacts associated with light and glare would be reduced in comparison to the proposed Project.

B. Agriculture and Forestry Resources

Under the NDA, no new development would occur on site. Under existing conditions, the 140.8-acre Project site is classified by the FMMP as containing 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," while the remaining 31.0 acres of the Project site are classified as "Other Lands." Thus, the NDA would avoid the Project's significant and unavoidable impacts due to the loss of "Important Farmland." The NDA would not conflict with the site's existing zoning classification or off-site agricultural uses; thus, impacts would be reduced in comparison to the proposed Project. Although the Project would be subject to compliance with Riverside County Ordinance No. 625, because no new development would occur under the NDA, the NDA would avoid the Project's less-than-significant impacts due to a conflict with off-site agricultural zoning on properties located within 300 feet of the Project site. 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 Govt. Code section 51104(g)). As such, neither the Project nor the NDA would result in impacts to forestry resources, and impacts would be the same.

C. Air Quality

Under the NDA, there would be no new construction or development on the Project site. Although both the Project and NDA would be consistent with the SCAQMD AQMP, because no new development would occur on site under the NDA, the NDA would avoid the Project's less-than-significant impacts due to a conflict with the AQMP. In addition, although the Project's construction- and operational-related air quality emissions would be below the applicable SCAQMD regional and localized thresholds, because there would be no development under the NDA there would be no increase in emissions of criteria pollutants. As such, the Project's less-than-significant regional air quality impacts would be completely avoided under the NDA. Additionally, 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 NDA, the NDA would result in reduced impacts to sensitive



receptors. Implementation of the NDA also would avoid the Project's less-than-significant impacts due to odors.

D. Biological Resources

With implementation of the NDA, there would be no new construction or development on the Project site, as such, the NDA would avoid all of the Project's significant but mitigable impacts to biological resources. Specifically, the NDA would avoid the Project's impacts to MSHCP Section 6.1.2 riparian/riverine habitat. The NDA also would avoid the Project's potentially significant impacts (prior to mitigation) to the burrowing owl. Furthermore, the NDA would avoid the Project's significant direct and cumulatively-considerable impacts to 0.14-acre of Regional Board jurisdictional waters and 0.24-acre of CDFW jurisdictional streambed. Additionally, the NDA would avoid the Project's significant impact prior to mitigation to 0.24-acre of Southern Willow Scrub. Both the NDA and the Project would have no impact on local policies or ordinances protecting biological resources, and impacts would be similar.

E. Cultural Resources

Under the NDA, there would be no new construction or development on the Project site. The NDA would avoid the Project's less-than-significant impacts (following mitigation) to previously undiscovered surface-level or subsurface historical resources that may be encountered during grading. Additionally, because there would be no new grading on site, the NDA 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 NDA in comparison to the Project.

F. Energy

Under the NDA, there would be no increase in demand from the Project site for energy resources. As such, the NDA 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 NDA would conflict with a State or local plan for renewable energy or energy efficiency, although impacts would be reduced under the NDA in comparison to the Project because the NDA would not result in an increase in use of energy resources.

G. Geology and Soils

Under the NDA, there would be no new 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 and similar under the proposed Project and the NDA and the level of impact would be similar. However, because the Project would involve a substantial increase in the number of residents on site, the Project's less-than-significant impacts (with mitigation) due to strong seismic ground shaking would be avoided under the NDA. Because no new development would occur, the NDA would result in reduced impacts as compared to the Project's less-than-significant impacts (with mitigation) due to lateral spreading and collapse hazards. Neither the Project nor the NDA would be subject to ground subsidence; there would be no impact for both the Project and the NDA, and the level of impact would be similar. Additionally, the Project and NDA would both be subject to less-than-significant impacts due to seismic-related ground failure and mudflow hazards. Thus, impacts would be similar. Because there would be no new development on site, the NDA would avoid the Project's less-than-significant impacts (after mitigation) due to cut or fill slopes higher



than 10 feet. Neither the Project nor the NDA would result in grading that affects or negates subsurface sewage disposal systems, and neither the Project nor the NDA would require septic tanks or alternative wastewater disposal systems on unsuitable soils; thus, impacts would be less than significant and similar under the NDA 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 NDA 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 NDA as compared to long-term operations associated with the Project. Lastly, the NDA would avoid the Project's less-than-significant impacts (after mitigation) due to expansive soils.

H. Greenhouse Gas Emissions

Under the NDA, 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 NDA. Accordingly, the NDA 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 NDA.

I. Hazards and Hazardous Materials

Under the NDA, there would be no new development on site. The NDA would avoid the Project's less-than-significant impacts due to the creation of a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials. There would be no construction activities or changes to operational conditions on site under the NDA; thus, the NDA would result in reduced impacts in comparison to the Project's less-than-significant construction and operational impacts due to hazardous materials. Neither the Project nor the NDA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts under the NDA 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 NDA would avoid the Project's less than significant impacts to evacuation traffic. Although neither the Project nor the NDA would emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, because there would be no change in the site's existing conditions impacts to nearby schools would be reduced in comparison to the Project's less-than-significant impacts. 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 NDA, and the level of impact would be similar. In addition, the Project site is not located within two miles of a public or private airport and is not located within an airport land use plan; thus, no impacts due to airport-related safety hazards would occur under the NDA or proposed Project, and the level of impact would be similar.

J. Hydrology and Water Quality

Under the NDA, there would be no new development on site. The NDA would result in reduced impacts to water quality as compared to the proposed 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; thus, long-term operational erosion impacts would be increased under the NDA due to the lack of impervious surfaces and vegetative cover on portions of the site. While the Project would result in less-than-significant impacts due to groundwater recharge, impacts to groundwater recharge would be reduced under the NDA 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, because there would be no changes to the site's drainage patterns under the NDA impacts would be reduced in comparison to the proposed Project. Similarly, although the Project would not exceed the capacity of any existing or planned stormwater drainage systems, because there would be no changes to site drainage under the NDA impacts would be reduced in comparison to the Project. The portions of the Project site proposed for development as part of the Project are not subject to flood hazards; thus, impacts due to flooding would be less than significant and would be similar under the Project and NDA. The Project site is not subject to inundation from flood hazards, tsunamis, or seiches; thus, impacts would be less than significant and would be similar under the Project and NDA.

K. Land Use and Planning

The NDA would be consistent with the existing land use designations applied to the property by the Riverside County General Plan and the LMWAP. Because the proposed Project proposes GPA No. 220009 to modify the land use designations assigned to the site, impacts would be decreased compared to the proposed Project. Neither the Project nor the NDA would conflict with the SCAG 2020-2045 RTP/SCS. Additionally, neither the Project nor the NDA would disrupt or divide the physical arrangement of an established community; thus, impacts would be less than significant, 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 NDA, and the level of impact would be similar. Additionally, neither the Project nor the NDA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and the NDA and Project would not 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's proposed residential uses would not be exposed to public and private airport-related noise levels exceeding 60 dBA CNEL; therefore, both the Project and the NDA would result in less-than-significant impacts. The NDA also would avoid the Project's less-than-significant impacts due to construction and long-term operational noise levels and would avoid the Project's less-than-significant impacts (with mitigation) due to off-site traffic-related noise levels. Additionally, the NDA would avoid the Project's less-than-significant impacts due to construction-related vibration, including vibration related to blasting and rock crushing activities.



N. Paleontological Resources

Under the NDA, there would be no new construction or development on site. Therefore, the NDA 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

There would be no new development under the NDA. Thus, the NDA would not result in the demolition of the existing single-family residential home currently on the property. While the Project would result in the demolition of one home, the Project would result in 231 residential homes constructed on the site, which would offset the loss of one single-family residence; therefore, no impacts would occur under the Project and the NDA regarding the displacement of substantial numbers of existing residents and impacts would be similar. Although the Project would result in less-than-significant impacts due to substantial unplanned population growth, the NDA would not result in any new development on site; thus, impacts under the NDA would be reduced in comparison to the proposed Project.

P. Public Services

There would be no new development on site under the NDA; thus, the NDA would avoid the Project's less-than-significant impacts to fire protection, police protection, school services, library services, and health services.

Q. Recreation

The NDA would not result in any new development on site and thus would not generate any increase in demand for recreational resources, nor would any recreational resources be constructed on site under the NDA. Although the Project would accommodate sufficient parkland to accommodate future residents of the Project through on-site trails and/or fee payments, the NDA would avoid the Project's physical impacts due to construction of recreational resources; thus, impacts to recreation would be reduced under the NDA in comparison to the proposed Project. Additionally, the NDA would avoid the Project's less-than-significant impacts due to increased use of existing recreational resources and due to Quimby fees.

R. Transportation

Under the NDA, there would be no new development on site and thus there would be no increase in traffic generated by the site. As such, the NDA would avoid the Project's significant and unavoidable impacts due to VMT. Additionally, due to the lack of improvements, the NDA would avoid the Project's less-than-significant impacts due to increased hazards due to a geometric design feature or incompatible uses. The NDA also would avoid the Project's less-than-significant impacts due to the need for new or altered maintenance of roads. The NDA would not involve a construction phase, and thus would avoid the Project's less-than-significant impacts (with mitigation) to circulation during construction activities on site and during improvement plans affecting public roadways. The NDA would not result in any impacts due to emergency access or access to nearby uses; thus, the NDA would avoid the Project's less-than-significant impacts (with mitigation) to emergency access during construction activities. No new bike lanes or trails would be constructed under the NDA; thus, the NDA would avoid the Project's less-than-significant impacts due to trail construction. The NDA would not result in



an increase in VMT; thus, the NDA would avoid the Project's significant and unavoidable impacts due to VMT.

S. Tribal Cultural Resources

Under the NDA, there would be no new construction or development on the Project site. The NDA would avoid the Project's less-than-significant impacts (following mitigation) 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, and also would avoid the Project's less-than-significant impacts (with mitigation) to previously undiscovered tribal cultural resources that may be buried beneath the site's surface. In addition, the NDA would completely avoid the Project's significant and unavoidable impacts to the Tribal Cultural Resource (TCR) landscape that was identified as part of tribal consultation efforts.

T. Utilities and Service Systems

Under the NDA, there would be no increased demand for water, wastewater treatment, or stormwater drainage; thus, the NDA 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 NDA; thus, the NDA would avoid the Project's less-than-significant impacts to water supply. Additionally, the NDA 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 NDA would avoid the Project's less-than-significant impacts due to solid waste. There are no components of the NDA 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 NDA also would avoid the Project's less-than-significant impacts 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 NDA, there would be no new development on site. Although impacts due to wildfire would be less than significant under the proposed Project, the NDA would result in reduced impacts due to wildfires because the NDA would not involve the construction of any new structures on site. Because no new structures would be constructed on-site, the NDA would avoid the Project's less than significant impacts to evacuation traffic. However, under the NDA the Project site would remain in its existing undeveloped condition, and the natural vegetation that occurs on site under existing conditions could serve as potential fuel for future wildfires in the local area; thus, long-term impacts due to wildland fire hazards associated with existing vegetation at the site would be increased under the NDA as compared to the proposed Project.

V. Conclusion

Implementation of the NDA 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 NDA, although a few new impacts, such as erosion and fire hazards, would be increased



under this alternative. In addition, implementation of the NDA would avoid the Project's significant and unavoidable impact to the TCR landscape that was identified during tribal consultation efforts, and also would avoid the Project's significant and unavoidable impacts to Agricultural Resources and due to VMT. Because this alternative would avoid most of the Project's impacts and would avoid the Project's significant and unavoidable impacts to the TCR landscape, 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 High Density Residential Alternative (HDRA), as discussed in subsection 6.3.3, is identified as the environmentally superior alternative .

The NDA would fail to meet all of the Project's objectives. Specifically, the NDA would not increase the available housing supply within the region, nor would the NDA assist Riverside County in meeting its RHNA allocation. The NDA also would not provide a system of public and community facilities, including recreational facilities, in an efficient and timely manner and meet the needs of Project residents. The NDA would not 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 drainage sites. Although the NDA would not adversely affect topographic, geologic, hydrologic, and environmental opportunities and constraints on site and would not result in alterations to natural landforms, the NDA would not meet the Project's objective to develop the property with a residential community with a design that takes topographic, geologic, hydrologic, and environmental opportunities and constraints into consideration.

6.3.2 NO PROJECT ALTERNATIVE

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 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.

A. Aesthetics

The Project site is not located within the viewshed of any officially-designated or eligible State or County scenic highways. Thus, no impacts to scenic corridors would occur under the Project or NPA, and the level of impact would be similar. As with the proposed Project, the NPA would not substantially damage scenic resources; obstruct any prominent scenic vista or view open to the public; or conflict with applicable zoning and other regulations governing scenic quality, and the level of impact would be similar. Although the Project



would not result in the creation of an aesthetically offensive site open to public view, because the NPA would result in less development on site the NPA would result in reduced impacts to aesthetics as compared to the proposed Project. Both the Project and NPA would be subject to compliance with Riverside County Ordinance Nos. 348 and 915, as well as the development standards and design guidelines proposed or approved, which would ensure that light and glare impacts would be less than significant under both the Project and the NPA, and the level of impact would be similar.

B. Agriculture and Forestry Resources

Under existing conditions, the entire 140.8-acre Project site is classified by the FMMP as containing 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,” while the remaining 31.0 acres of the Project site are classified as “Other Lands.” Areas planned for disturbance and long-term development would be similar under the Project and the NPA. Thus, significant and unavoidable impacts due to the loss of “Important Farmland” would occur under both the Project and the NPA, and the level of impact would be the same. Both the Project and the NPA would be subject to compliance with Riverside County Ordinance No. 625; therefore, both the Project and the NPA would result in less-than-significant impacts due to a conflict with off-site agricultural zoning on properties located within 300 feet of the site, and impacts 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 Govt. Code section 51104(g)). As such, neither the Project nor the NPA would result in impacts to forestry resources, and impacts would be the same.

C. Air Quality

Because the NPA would develop the site in accordance with the site’s existing General Plan land use designations, the NPA would not exceed the growth assumptions of the SCAQMD AQMP. The number of single-family dwelling units on-site would decrease from 231 under the proposed Project to 106 under the NPA. Because the land use intensity would be decreased, the NPA would result in reduced air quality emissions as compared to the proposed Project, although air quality impacts would be less than significant under both the Project and NPA. Additionally, the NPA would result in reduced impacts due to a cumulatively considerable net increase of criteria pollutants. Neither the Project nor the NPA would result in the exposure of sensitive receptors within one mile of the Project site to substantial pollutant concentrations; thus, no impact would occur and the level of impact would be similar. Furthermore, neither the Project nor the NPA would result in other emissions, such as those leading to odors, affecting sensitive receptors, and the level of impact would be similar.

D. Biological Resources

The NPA would result in a decrease in residential housing units on-site. However, the total area impacted under the NPA would be similar to the total area impacted under the Project due to the increased individual lot sizes under the NPA. The NPA would result in similar significant impacts to MSHCP Section 6.1.2 riparian/riverine habitat within Drainage 1. Both the Project and the NPA have the potential to become occupied by burrowing owls prior to commencement of construction activities. Both the NPA and the Project would be required to pay MSHCP fees pursuant to Riverside County Ordinance No. 810, and impacts to other incidental MSHCP-covered species would be less than significant. The site does not contain wildlife corridors



or native wildlife nursery sites; thus, the Project and the NPA would result in similar less-than-significant impacts. The Project and NPA would both result in similar impacts to federally-protected wetland habitat, Corps jurisdictional waters, Regional Board jurisdictional waters, and CDFW jurisdictional waters. Therefore, both the NPA and the Project would result in similarly significant and cumulatively considerable impacts for which mitigation would be required. Additionally, neither the Project nor the NPA would result in impacts to local policies or ordinances protecting biological resources.

E. Cultural Resources

Both the Project and the NPA would preserve approximately 23.82 acres of open space, including areas containing sensitive cultural resources. Thus, impacts to previously-identified cultural resources would be less than significant under both the Project and NPA with implementation of mitigation measures, and the level of impact would be the same. Both the Project and the NPA would result in significant but mitigable impacts due to potential impacts to previously-undiscovered subsurface historical and archaeological resources, and the level of impact would be the same. Likewise, both the Project and NPA would result in significant but mitigable impacts to human remains, and the level of impact would be the same.

F. Energy

Energy consumed during construction of the proposed Project and NPA would be similar, and would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Construction-related impacts due to energy consumption would be less than significant under the Project and NPA, although the level of impact would be slightly reduced under the NPA due to the construction of fewer dwelling units. Based on the rates utilized in Riverside County EIR No. 521, and due to the decrease in single-family residential units, the NPA would generate a demand for electricity that is approximately half the proposed Project's electricity demand, and also would generate approximately half of the demand for natural gas than the proposed Project. Therefore, the NPA would result in reduced impacts in comparison to the proposed Project. The Project and the NPA would not conflict with any applicable State or local plans, resulting in similar less-than-significant impacts.

G. Geology and Soils

Both the Project and NPA would be required to comply with the site-specific recommendations of a geotechnical study to address potential geologic hazards, which would reduce potential impacts due to geology and soils to less-than-significant levels. There are no known faults on or trending towards the site; thus, impacts associated with rupture of a known fault would be less than significant and similar under the proposed Project and the NPA. However, because the Project would involve a higher number of residents on site compared to the NPA, the Project's less-than-significant impacts (with mitigation) due to strong seismic ground shaking and collapse hazards would be reduced under the NPA. Because development would occur over approximately the same area under the NPA and proposed Project, impacts due to unstable geologic units or soils that are unstable and that potentially could result in on- or off-site landslide, lateral spreading, or rockfall hazard would be similar and would be less than significant. Impacts associated with ground subsidence also would be similar under the NPA and the proposed Project. Both the NPA and the proposed Project would have less-than-significant impacts (with mitigation) due to cut or fill slopes higher than 10 feet. Neither the Project nor the NPA would result in grading that affects or negates subsurface sewage disposal systems, and neither the Project nor the NPA would require septic tanks or alternative wastewater disposal systems on unsuitable soils; thus,



impacts would be less than significant and similar under the NPA and proposed Project. Similarly, impacts due to erosion hazards during construction and long-term operation would be similar under the NPA and proposed Project and impacts would be less than significant.

H. Greenhouse Gas Emissions

As previously noted, the NPA would generate a demand for energy resources that is approximately half the proposed Project's demand, and also would result in a substantial reduction in the amount of traffic generated by the Project site. As such, it can be concluded that total GHG emissions and associated impacts under the NPA would be decreased as compared to the proposed Project. As with the Project, the NPA would be required to demonstrate consistency with the County's Climate Action Plan (CAP) Update, which would reduce GHG impacts to less-than-significant levels. Neither the Project nor the NPA would conflict with applicable plans, policies, or regulations related to GHGs; thus, impacts would be less than significant and the level of impact would be similar.

I. Hazards and Hazardous Materials

Land uses under the NPA would be similar to the proposed Project, with a decrease in the number of single-family residential units. Neither the Project nor the NPA would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; thus, impacts would be less than significant, and the level of impact would be similar. Additionally, neither the NPA nor the Project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and the level of impact would be similar. Neither the Project nor the NPA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts under the NPA and proposed Project would be less than significant and the level of impact would be similar. The NPA would result in the construction of fewer dwelling units in comparison to the proposed Project. Thus, the NPA would result in reduced impacts to evacuation traffic in comparison to the proposed Project due to fewer occupants on site. Neither the Project nor the NPA would emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; thus, impacts would be less than significant, and the level of impact would be similar. 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 NPA, and the level of impact would be the same.

J. Hydrology and Water Quality

Both the Project and the NPA would be subject to compliance with the Santa Ana Region Basin Plan, and would be required to comply with the requirements of the Santa Ana Regional Water Quality Control Board (RWQCB) and the County of Riverside. This includes the requirement to obtain a NPDES Municipal Stormwater Permit for construction activities, which requires the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that would include measures to address water pollution, including sedimentation. Additionally, both the Project and NPA would be subject to NPDES requirements for long-term operations, which would reduce potential water quality impacts (including sediments) from construction to less-than-significant levels. It is not expected that the Project or NPA would result in substantial changes to the existing drainage system of the Project site and area, thus, impacts would be less than significant and the level of impact would be similar. Both the Project and the NPA would be required to incorporate



drainage features (such as detention basins and water quality basins) to ensure that runoff is treated for water quality and is detained prior to discharge such that the rate of runoff from the Project site does not exceed the rates that occur under existing conditions. Thus, impacts related to exceeding the capacity of existing or planned stormwater drainage facilities and downstream erosion hazards would be less than significant and the level of impact would be similar. The Project site is not subject to flood hazards, tsunamis, or seiche zones, and would have no impact on existing flood plains; thus, impacts due to pollution from inundation from flooding, tsunamis, and seiches would be less than significant, and the level of impact would be similar.

K. Land Use and Planning

Assuming approval of the Project's proposed GPA No. 220009, both the Project and the NPA would be fully consistent with the Riverside County General Plan and LMWAP. Thus, impacts due to a conflict with the General Plan would be less than significant under both the Project and the NPA, although the level of impact would be reduced under the NPA since no General Plan Amendment would be required. Both the Project and NPA also would be consistent with SCAG's 2020-2045 RTP/SCS, and as such impacts due to a conflict would be similar and less than significant. Additionally, neither the Project nor the NPA would disrupt or divide the physical arrangement of an established community; thus, impacts would be less than significant 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 NPA, and the level of impact would be similar. Additionally, neither the Project nor the NPA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and the NPA and Project would not 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's proposed residential uses would not be exposed to public or private airport-related noise levels exceeding 60 dBA CNEL; therefore, the NPA would result in similar less-than-significant impacts as compared to the proposed Project. Because the NPA would result in less construction and fewer residents, noise impacts associated with construction and long-term operations, including impacts related to traffic-related noise, would decrease as compared to the proposed Project, although impacts are anticipated to be less than significant under both the Project and the NPA. Both the NPA and the Project would result in less-than-significant noise and vibration impacts due to blasting rock crushing activities, and the level of impact would be the same.

N. Paleontological Resources

The Project site was determined to have a "Low Potential (L)" for containing paleontological resources. However, there is a remote potential that fossils may be discovered during grading and earthmoving activities, which is evaluated as a potentially significant impact of the proposed Project and the NPA. Because areas of physical impact would be similar under the Project and NPA, both the Project and NPA would result in significant but mitigatable impacts to paleontological resources that may be buried beneath the site's surface, and the level of impact would be similar.



O. Population and Housing

Neither the Project nor the NPA would result in the displacement of substantial numbers of existing people or housing, necessitating the construction of housing elsewhere; thus, no impact would occur under either the Project or the NPA. Although the number of single-family residences on site would vary between the Project and the NPA, neither the NPA nor the Project would represent substantial unplanned population growth as the Project site is currently planned for urban land uses by the County's General Plan, although impacts would be reduced under the NPA due to the reduction in the number of dwelling units. Additionally, neither the Project nor the NPA would indirectly induce growth, as infrastructure improvements would be sized to accommodate only future development on site, and the level of impact would be the same.

P. Public Services

The NPA would result in a decrease in the number of single-family homes on-site compared to the proposed Project by approximately 126 dwelling units. As such, impacts to fire services, sheriff services, school services, library facilities, and health services would be decreased under the NPA as compared to the Project. Impacts under both the Project and the NPA would be less than significant with payment of mandatory Development Impact Fees (DIF) in accordance with Riverside County Ordinance No. 659 and mandatory payment of school impact fees pursuant to Senate Bill 50 (SB 50).

Q. Recreation

The NPA would result in a decrease in the number of single-family residences on-site to 106 compared to the 231 units proposed under the Project. Due to the decrease in the number of dwelling units on-site, the NPA would result in a smaller increase in residents and therefore would lead to less degradation of existing recreational facilities, although impacts would be less than significant under both the Project and the NPA. Both the Project and NPA would involve the construction of recreational facilities on site (e.g., trails), although such impacts would be inherent to the construction phase and the level of impact would be similar. Both the NPA and the Project would be required to pay associated park fees (i.e., Quimby Fees) to reduce potential impacts to less-than-significant levels, and the level of impact would be similar.

R. Transportation

Both the Project and the NPA would be required to comply with all applicable provisions of the County's General Plan, LMWAP, and Riverside County ordinances. As such, neither the Project nor NPA would conflict with a program, plan, ordinance, or policy addressing the circulation system; thus, impacts would be less than significant, and the level of impact would be similar. The NPA would result in less-than-significant impacts due to VMT, as the NPA would be considered a small project and presumed to cause a less-than-significant impact under the Riverside County Transportation Analysis Guidelines. Impacts due to hazardous geometric design features and incompatible uses would be less than significant under both the Project and the NPA, and the level of impact would be similar. Both the Project and the NPA would result in less-than-significant impacts due to the need for new or altered maintenance of roads, and the level of impact would be similar. Both the Project and the NPA would have the potential to result in impacts to circulation during construction, including emergency access routes, although impacts would be reduced to less-than-significant levels with mitigation, and the level of impact after mitigation would be similar under the Project and NPA.



Both the Project and NPA would be required to accommodate facilities for bicycles, although impacts associated with the construction of such trails have been evaluated herein, and both the Project and NPA would result in similar less-than-significant impacts due to bicycle facilities.

S. Tribal Cultural Resources

Both the Project and the NPA would preserve approximately 23.82 acres of open space, including areas containing sensitive cultural resources. Impacts to previously-identified cultural resources would be less than significant under both the Project and NPA with implementation of mitigation measures, and the level of impact would be the same. Both the Project and the NPA would result in significant but mitigable impacts due to potential impacts to previously-undiscovered subsurface tribal cultural resources, and the level of impact would be the same and would be less than significant with the implementation of mitigation measures. However, based on consultation efforts with local area Tribes, it was determined that the Project site comprises a component of a larger TCR landscape. As the NPA would entail development of the Project site in the same general locations as the proposed Project but at a lower density, the NPA would not avoid the Project's significant and unavoidable impacts to the TCR landscape. Thus, impacts to TCRs under the NPA would be significant and unavoidable, and the level of impact would be similar to the proposed Project.

T. Utilities and Service Systems

The level of development intensity on-site would be decreased under the NPA as compared to the proposed Project. Both the Project and NPA would require the construction of water, wastewater, stormwater drainage, electric power, natural gas, and telecommunication facilities. Impacts associated with the provision of such facilities would be similar and would be mitigated to less-than-significant levels with implementation of the mitigation measures identified throughout this EIR. Due to the reduction in the number of dwelling units on site, the NPA would result in a substantial reduction in demands for water resources, although impacts due to water supply would be less than significant under both the Project and NPA.

U. Wildfire

Development under the NPA would be similar to the proposed Project, and likely would entail the development of buildings in similar proximity to off-site areas that are subject to wildland fire hazards. As such, impacts associated with wildfire would be similar under the NPA as compared to the Project, although neither the Project nor the NPA would result in significant impacts due to wildfire-related hazards. The NPA would result in the construction of fewer dwelling units in comparison to the proposed Project. Thus, the NPA would result in reduced impacts to evacuation traffic in comparison to the proposed Project due to fewer occupants on site.

V. Conclusion

As compared to the proposed Project, the NPA would have decreased impacts under the issue areas of aesthetics, air quality, energy, geology/soils, greenhouse gas emissions, land use/planning, noise, population/housing, public services, recreation, transportation, and utilities/service systems. The NPA would result in the same or similar impacts under the issues of agriculture/forestry resources, biological resources, cultural resources, hazards/hazardous materials, hydrology/water quality, mineral resources, paleontological resources, tribal cultural resources, and wildfire. Implementation of the NPA would avoid the Project's



significant and unavoidable impacts due to VMT, but impacts to agricultural resources and TCRs would remain significant and unavoidable.

The NPA would generally meet the Project's objectives, although generally to a lesser extent. Because the NPA would involve less residential development on site, the NPA would be less effective than the proposed Project in 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. The NPA would be more effective than the Project in meeting the Project's objective 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. The NPA would be equally effective as the Project in developing a residential community with a design that takes topographic, geologic, hydrologic, and environmental opportunities and constraints into consideration. Because the NPA would involve fewer residential dwelling units the NPA would be less effective in meeting the Project's objective 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 the surrounding communities. Similarly, because fewer homes would be accommodated on site, the NPA would be less effective than the Project in meeting the Project's objective to assist Riverside County in meeting its Regional Housing Needs Assessment (RHNA) allocation by developing low density residential uses. The NPA would be equally effective as the proposed Project in providing 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.

6.3.3 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, FGPA's are required for any change from the "Rural Community" Foundation Component to the "Community Development" Foundation Component, and FGPA's 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.

A. Aesthetics

Under the HDRA, development on site would be restricted to the approximately 5.5 acres of the Project site that would be developed with 110 very high density single-family attached dwelling units, with the remaining portions of the Project site remaining in their existing condition. Due to the lack of officially-designated State



or County scenic highway corridors within the Project's vicinity or viewshed, the HDRA would result in no impacts to scenic highway corridors, and the level of impact would be similar to the proposed Project. Due to the lack of prominent scenic resources on the Project site under existing conditions, and because views of distant scenic resources (such as the Santa Ana Mountains) still would be available in surrounding areas, implementation of the HDRA would result in less-than-significant impacts to scenic resources and less-than-significant impacts due to the degradation of the existing visual quality or character of public views of the site, and the level of impact would be reduced in comparison to the Project due to the reduced amount of proposed development on site. Because development on site under the HDRA would require slightly taller buildings than would occur under the proposed Project, and because the HDRA would entail development of a smaller portion of the Project site as compared to the Project, the level of impacts to scenic resources and visual quality/character would be similar between the proposed Project and HDRA. Neither the Project nor the HDRA would conflict with Riverside County Ordinance No. 655, and the neither the Project nor the HDRA would result in significant lighting impacts assuming mandatory compliance with Riverside County Ordinance No. 655; thus, impacts due to light and glare would be less than significant under both the Project and HDRA, and the level of impact would be similar.

B. Agriculture and Forestry Resources

Implementation of the HDRA would result in impacts to approximately 5.5 acres of land classified by the FMMP as containing "Farmland of Statewide Importance," while agricultural activities could continue to occur on the +/- 135.3 acres of the Project site that would remain undeveloped. In comparison, the proposed Project would completely preclude future agricultural activities on site, and thus would result in direct and cumulatively-considerable unavoidable impacts to 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." Thus, the Project's significant and unavoidable impacts to Farmland would be substantially reduced under the HDRA, although impacts to 5.5 acres of "Farmland of Statewide Importance" still would represent a significant and unavoidable impact under the HDRA. As with the proposed Project, the HDRA would require a Change of Zone to change the zoning classification for the 5.5 acres of the property proposed for residential development under the HDRA, which would ensure that impacts due to a conflict with the site's existing agricultural zoning classification would be reduced to less-than-significant levels. As noted in EIR Subsection 4.2, since at least 202 the Project site has not been used for agricultural production; thus, impacts due to a conflict with existing agricultural uses on site would be less than significant under both the Project and HDRA, and the level of impact would be similar. The Project site and surrounding areas are not subject to a County Agricultural Preserve or a Williamson Act Contract; thus, impacts due to a conflict with a Williamson Act contract or land within a Riverside County Agricultural Preserve would be less than significant under both the Project and HDRA, and the level of impact would be similar. Both the Project and HDRA would be subject to compliance with Riverside County Ordinance No. 625 due to existing agriculturally-zoned lands that occur within 300 feet of the Project site, which would ensure that impacts due to the introduction of non-agricultural uses within 300 feet of agriculturally-zoned property would be less than significant, with the level of impact being similar under the Project and HDRA. Likewise, mandatory compliance with Ordinance No. 625 would ensure that neither the Project nor the HDRA result in changes to the existing environment which could result in the conversion of Farmland to non-agricultural use, thereby resulting in less-than-significant and similar levels of impact. There are no forestlands in the Project area; thus, neither the Project nor the HDRA would conflict with existing forestry-related zoning, result in the conversion of forest land to non-forest use, or result in other changes in the existing environment that could result in the conversion of



forest land to non-forest uses; thus, impacts would be less than significant, and the level of impact would be similar between the Project and HDRA.

C. Air Quality

Implementation of the HDRA would result in the development of 5.5 acres of the Project site with 110 CD-VHDR dwelling units, whereas the proposed Project would increase the allowable density allowed on site to accommodate 231 dwelling units. Although the Project's impacts due to a conflict with the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP) would be less than significant under the Project because the Project would not exceed any of the SCAQMD Regional Thresholds or Localized Significance Thresholds, the proposed 110 dwelling units under the HDRA would not exceed the land use assumptions made by the AQMP for the Project site. Accordingly, implementation of the HDRA would result in reduced impacts due to a conflict with the SCAQMD AQMP, although such impacts would be less than significant under both the Project and HDRA. Similarly, while the proposed Project would not result in a cumulatively-considerable net increase of any criteria pollutant for which the project region is non-attainment and impacts would be less than significant, because the HDRA would include only 110 dwelling units as compared to the 231 dwelling units proposed as part of the Project, implementation of the HDRA would result in reduced impacts to regional air quality as compared to the Project during both construction and long-term operation. Likewise, while the proposed Project would result in less-than-significant impacts during construction and long-term operation due to localized air quality emissions, construction activities and long term operational activities under the HDRA would result in reduced localized air quality emissions as compared to the Project. Neither the Project nor the HDRA would have the potential to cause or contribute to a CO "hot spot," resulting in similar less-than-significant impacts. Finally, neither the Project nor the HDRA would include land uses that would result in other emissions (such as odors) that could affect a substantial number of people; thus, impacts under both the Project and HDRA would be less than significant, and the level of impact would be similar.

D. Biological Resources

Implementation of the HDRA would result in disturbances to approximately 5.5 acres of the Project site, as compared to the Project's 110.0 acres of impacts on site. While both the Project and HDRA would fully comply with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), the HDRA would avoid the Project's impacts to the on-site drainages; thus, implementation of the HDRA would avoid the Project's impacts to 0.24-acre of MSHCP-defined riparian/riverine habitat. However, both the Project and HDRA would require mitigation to address potential impacts to the burrowing owl. Accordingly, impacts due to a conflict with the MSHCP would be reduced under the HDRA in comparison to the proposed Project, although impacts due to a conflict with the MSHCP would be less than significant under both the Project and HDRA with implementation of the mitigation measures identified in EIR Subsection 4.4. While neither the Project nor the HDRA would result in impacts to special-status plants, both the Project and the HDRA have the potential to result in impacts to the burrowing owl during construction activities, although impacts would be reduced under the HDRA in comparison to the Project due to the reduction in areas proposed for development under the HDRA. In addition, implementation of the HDRA would avoid the Project's significant but mitigable impacts to least Bell's vireo, as the HDRA would not require any disturbance within or adjacent to the on-site drainages where least Bell's vireo have the potential to occur. Accordingly, implementation of the HDRA would result in reduced impacts to special-status wildlife species in comparison to the Project,



although both the Project and HDRA would result in less-than-significant impacts with implementation of the identified mitigation measures. There are no wildlife corridors existing or planned within the Project vicinity; thus, both the Project and HDRA would result in less-than-significant impacts to wildlife movement corridors and wildlife nursery sites, and the level of impact would be similar. Implementation of the proposed Project would result in impacts to 0.14-acre of Regional Board jurisdictional waters and 0.24-acre of CDFW jurisdictional streambed, while the HDRA would not result in any impacts to jurisdictional waters; thus, although Project impacts to jurisdictional waters would be reduced to less-than-significant levels with mitigation, impacts to jurisdictional waters would be completely avoided under the HDRA. There are no other local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, that are applicable to the Project area; thus, neither the Project nor the HDRA would conflict with such local policies or ordinances, and the level of impact would be the same.

E. Cultural Resources

Neither the Project nor the HDRA would result in impacts to previously-discovered historical resources, both the Project and HDRA have the potential to result in impacts to subsurface historical resources that may be uncovered during site grading activities; thus, impacts to previously-undiscovered historical resources would be less than significant under both the Project and HDRA with the implementation of mitigation measures, although such impacts would be substantially reduced under the HDRA due to the reduction in areas subject to grading and disturbance under the HDRA by approximately 104.5 acres. Based on the confidential maps included in the Project's Phase II Cultural Resources Assessment (EIR *Technical Appendix D2*), which are not available for public review, implementation of the HDRA would avoid the Project's impacts to all of the identified cultural resources sites on the property, with exception of one feature that was determined not to be eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR); thus, implementation of the HDRA would result in a substantial reduction in impacts to cultural resources as compared to the Project. However, both the Project and HDRA have the potential to result in previously-undiscovered subsurface archaeological resources, which would require mitigation in the form of monitoring during ground-disturbing activities. Thus, while impacts to cultural resources would be less than significant under both the Project and HDRA with the implementation of mitigation measures, impacts to cultural resources would be substantially reduced under the HDRA in comparison to the Project. Both the Project and HDRA would be subject to compliance with California Health and Safety Code, § 7050.5 and California Public Resources Code § 5097.98, which would ensure that significant impacts to human remains are precluded; however, due to the reduction in grading activities under the HDRA, potential impacts to human remains would be substantially reduced under the HDRA in comparison to the proposed Project.

F. Energy

Based on the analysis presented in EIR Subsection 4.6, neither the Project nor the HDRA would result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption of energy resources during near-term construction or long-term operational activities. However, because the HDRA would entail a substantial reduction in construction activities on site and would include 121 fewer units than the proposed Project, implementation of the HDRA would result in reduced construction and operational-related impacts due to energy consumption as compared to the Project. Neither the Project nor the HDRA have the potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency; thus, impacts would be less than significant and similar under the proposed Project and HDRA.



G. Geology and Soils

Implementation of the HDRA would entail development on only approximately 5.5 acres of the Project site, as compared to the 111.0 acres of grading and disturbance under the proposed Project. Thus, while the Project would result in less-than-significant impacts with mitigation requiring compliance with the recommendations of a site-specific geotechnical study, impacts to geology and soils generally would be substantially reduced under the HDRA in comparison to the Project. Specifically, in comparison to the Project the HDRA would result in reduced impacts due to earthquake faults and strong seismic ground shaking; similar less-than-significant impacts due to liquefaction hazards; reduced impacts due to lateral spreading and collapse (with no impacts due to landslide hazards or rockfall hazards under the Project or HDRA); reduced impacts due to changes to topography or ground relief features; reduced impacts due to cut or fill slopes greater than 2:1 or higher than 10 feet; reduced impacts due to soil erosion or the loss of top soil and due to increases in wind erosion; and reduced impacts due to expansive soils. Impacts due to subsidence and septic systems/alternative wastewater disposal systems would not occur under either the Project or the HDRA, and the level of impact would be the same.

H. Greenhouse Gas Emissions

As discussed in EIR Subsection 4.8, implementation of the proposed Project would result in annual emissions of approximately 4,146.60 MTCO₂e per year, which would exceed the County's Climate Action Plan (CAP) screening threshold of 3,000 MTCO₂e per year and thus would represent a significant impact requiring mitigation in the form of achieving a minimum of 100 points pursuant to the CAP screening tables. As shown in EIR Table 4.8-7, approximately 75.1% of the Project's anticipated GHG emissions would be the result of vehicular traffic. According to the Institute of Transportation Engineers Trip Generation Manual, single-family attached dwelling units generate approximately 7.20 vehicle trips per day. Thus, the HDRA would result in approximately 792 average daily trips (ADT), as compared to the proposed Project's anticipated 2,198 trips per day. Conservatively assuming the same level of GHG emissions as the Project for area source, energy source, water usage, waste, and refrigerants as shown in EIR Table 4.8-4 for the proposed Project, and with the reduction in traffic-related emissions by approximately 64.0% as compared to the proposed Project, implementation of the HDRA conservatively would result in annual GHG emissions of approximately 2,153.38 MTCO₂e/year, which is below the County's CAP screening threshold of 3,000 MTCO₂e/year. The actual amount of GHG emissions associated with the HDRA likely would be much less as the HDRA would include reduced emissions from area source, energy source, water usage, waste, and refrigerants as compared to the Project. Thus, implementation of the HDRA would avoid the Project's significant but mitigable impacts due to GHG emissions. Neither the Project nor the HDRA have the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases; thus, impacts would be less than significant, and the level of impact would be similar.

I. Hazards and Hazardous Materials

Neither the Project nor the HDRA would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or create a significant hazard to the public, or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; impacts would be less than significant, and the level of impact would be similar. Similarly, neither the Project nor the HDRA would impair implementation of or physically interfere



with an adopted emergency response plan or an emergency evacuation plan; impacts would be less than significant, and the level of impact would be similar. Neither the Project nor the HDRA 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 would be less than significant, and the level of impact would be similar. The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; thus, neither the Project nor the HDRA would 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 the level of impact (no impact) would be the same. Both the Project and HDRA would be subject to review by the Riverside County Airport Land Use Committee and would be subject to compliance with the ALUC's standard conditions of approval, compliance with which would ensure that impacts due to airport-related hazards would be less than significant under both the Project and HDRA, although the level of impact would be slightly reduced under the HDRA due to the proposed reduction in the number of dwelling units on site.

J. Hydrology and Water Quality

Both the Project and the HDRA would be subject to compliance with the Santa Ana Region Basin Plan, and would be required to comply with the requirements of the Santa Ana RWQCB and the County of Riverside. This includes the requirement to obtain an NPDES Municipal Stormwater Permit for construction activities, which requires the preparation and implementation of a SWPPP that would include measures to address water pollution, including sedimentation. Additionally, both the Project and HDRA would be subject to NPDES requirements for long-term operations, which would reduce potential water quality impacts (including sediments) from construction to less-than-significant levels. Although water quality impacts would be less than significant under both the Project and HDRA, impacts would be reduced under the HDRA due to the reduction in areas proposed for development. It is not expected that the Project or HDRA would result in substantial changes to the existing drainage system of the Project site and area, thus, impacts would be less than significant; however, because grading activities under the HDRA would be substantially reduced as compared to the Project, impacts due to changes to the existing drainage patterns would be reduced under the HDRA. Both the Project and the HDRA would be required to incorporate drainage features (such as detention basins and water quality basins) to ensure that runoff is treated for water quality and is detained prior to discharge such that the rate of runoff from the Project site does not exceed the rates that occur under existing conditions; however, due to the reduction in areas proposed for development under the HDRA, potential impacts related to exceeding the capacity of existing or planned stormwater drainage facilities and downstream erosion hazards would be reduced under the HDRA as compared to the Project. The Project site is not subject to flood hazards, tsunamis, or seiche zones, and would have no impact on existing flood plains; thus, impacts due to pollution from inundation from flooding, tsunamis, and seiches would be less than significant, and the level of impact would be similar.

K. Land Use and Planning

While both the Project and HDRA would require a General Plan Amendment to accommodate increased residential density on site, the HDRA would require approval of an FGPA whereas the proposed Project requires only an Entitlement/Policy Amendment; thus, while impacts due to a conflict with the site's existing General Plan and LMWAP land use designations would be less than significant under both the Project and



HDRA with approval of a GPA and FGPA respectively, impacts to land use would be increased under the HDRA in comparison to the Project due to the extent of intensification of density that would be allowed on site. Additionally, neither the Project nor the HDRA would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect; thus, impacts would be less than significant and the level of impact would be similar. Due to the lack of residential developments to the immediate west and north, neither the Project nor the HDRA would have the potential to physically divide an established residential community; thus, no impact would occur under the Project or HDRA, and the level of impact would be the same.

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 HDRA, and the level of impact would be similar. Additionally, neither the Project nor the HDRA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and the HDRA and Project would not 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's proposed residential uses would not be exposed to public or private airport-related noise levels exceeding 60 dBA CNEL; therefore, the HDRA would result in similar less-than-significant impacts as compared to the proposed Project. Because the HDRA would result in less construction and fewer residents, noise impacts associated with construction and long-term operations, including impacts related to traffic-related noise, would decrease as compared to the proposed Project, although impacts are anticipated to be less than significant under both the Project and the HDRA. Both the HDRA and the Project would result in less-than-significant noise and vibration impacts due to blasting rock crushing activities, and the level of impact would be the same.

N. Paleontological Resources

The Project site was determined to have a "Low Potential (L)" for containing paleontological resources. However, there is a remote potential that fossils may be discovered during grading and earthmoving activities, which is evaluated as a potentially significant impact of the proposed Project and the HDRA. However, because areas of physical impact would be substantially reduced under the HDRA in comparison to the Project, the HDRA would result in a substantial reduction in potential impacts to paleontological resources, although mitigation measures would be required for both the Project and HDRA to reduce potential impacts to less-than-significant levels.

O. Population and Housing

Neither the Project nor the HDRA would result in the displacement of substantial numbers of existing people or housing, necessitating the construction of housing elsewhere; thus, no impact would occur under either the Project or the HDRA, and the level of impact would be the same. Although the number of single-family residences on site would vary between the Project and the HDRA, neither the HDRA nor the Project would represent substantial unplanned population growth as the Project site is currently planned for urban land uses



by the County's General Plan, although impacts would be reduced under the HDRA due to the reduction in the number of dwelling units. Additionally, neither the Project nor the HDRA would indirectly induce growth, as infrastructure improvements would be sized to accommodate only future development on site, and the level of impact would be the same.

P. Public Services

The HDRA would result in a decrease in the number of single-family homes on-site compared to the proposed Project by approximately 121 dwelling units. As such, impacts to fire services, sheriff services, school services, library facilities, and health services would be decreased under the HDRA as compared to the Project. Impacts under both the Project and the HDRA would be less than significant with payment of mandatory Development Impact Fees (DIF) in accordance with Riverside County Ordinance No. 659 and mandatory payment of school impact fees pursuant to Senate Bill 50 (SB 50).

Q. Recreation

The HDRA would result in a decrease in the number of single-family residences on-site to 110 units compared to the Project's proposed 231 units. Due to the decrease in the number of dwelling units on-site, the HDRA would result in a smaller increase in residents and therefore would lead to less degradation of existing recreational facilities, although impacts would be less than significant under both the Project and the HDRA. The HDRA likely would not include any trails or recreational facilities, and as such the HDRA would result in reduced impacts due to the construction of recreational facilities on site as compared to the Project, although with the mitigation measures presented throughout this EIR impacts due to the construction of recreational facilities would be less than significant under both the Project and HDRA. Both the HDRA and the Project would be required to pay associated park fees (i.e., Quimby Fees) to reduce potential impacts to less-than-significant levels, although the level of impact would be slightly increased under the HDRA since the proposed Project includes on-site recreational amenities.

R. Transportation

Both the Project and the HDRA would be required to comply with all applicable provisions of the County's General Plan, LMWAP, and Riverside County ordinances. As such, neither the Project nor HDRA would conflict with a program, plan, ordinance, or policy addressing the circulation system; thus, impacts would be less than significant, and the level of impact would be similar. The HDRA would result in less-than-significant impacts due to VMT, as the HDRA would be considered a small project that includes 110 or fewer dwelling units and is thereby presumed to cause a less-than-significant impact under the Riverside County Transportation Analysis Guidelines. Impacts due to hazardous geometric design features and incompatible uses would be less than significant under both the Project and the HDRA, although the level of impact would be slightly decreased under the HDRA as there would be fewer necessary roadway improvements on and adjacent to the Project site under the HDRA as compared to the Project. Both the Project and the HDRA would have the potential to result in impacts to circulation during construction, including emergency access routes, although impacts would be reduced to less-than-significant levels with mitigation, although the level of impact after mitigation would be slightly reduced under the HDRA due to the limited number of circulation improvements that would be required on and adjacent to the site. Both the Project and HDRA would be required to accommodate facilities for bicycles, although impacts associated with the construction of such



trails have been evaluated herein, and both the Project and HDRA would result in similar less-than-significant impacts due to bicycle facilities.

S. Tribal Cultural Resources

The Project would preserve approximately 23.82 acres of open space, including areas containing sensitive cultural resources, while under the HDRA approximately 135.3 acres of the Project site would be left in its existing condition. Impacts to previously-identified cultural resources would be less than significant under both the Project and HDRA with implementation of mitigation measures, although the level of impact would be substantially reduced under the HDRA due to the reduction in areas requiring grading as part of site development and because the HDRA would result in impact to only one previously-discovered cultural resources site that was determined not to be eligible for listing under the NRHP or CRHR. Both the Project and the HDRA would result in significant but mitigable impacts due to potential impacts to previously-undiscovered subsurface tribal cultural resources, and the level of impact would be the same and would be less than significant with the implementation of mitigation measures. However, based on consultation efforts with local area Tribes, it was determined that the Project site comprises a component of a larger TCR landscape. As the HDRA would entail development of a 5.5-acre portion of the Project site, the HDRA would not avoid the Project's significant and unavoidable impacts to the TCR landscape, but would substantially reduce the Project's impacts to the TCR landscape with the avoidance of 135.3 acres of the Project site under the HDRA. Thus, impacts to TCRs under the HDRA would be significant and unavoidable, but the level of impact would be substantially reduced in comparison to the proposed Project.

T. Utilities and Service Systems

The level of development intensity on-site would be decreased under the HDRA as compared to the proposed Project. Both the Project and HDRA would require the construction of water, wastewater, stormwater drainage, electric power, natural gas, and telecommunication facilities, although impacts associated with the provision of such facilities would be substantially reduced under the HDRA due to the substantial reduction in areas proposed for development. As with the Project, impacts associated with the installation of new utility connections would be mitigated to less-than-significant levels with implementation of the mitigation measures identified throughout this EIR. Due to the reduction in the number of dwelling units on site, the HDRA would result in a substantial reduction in demands for water resources, although impacts due to water supply would be less than significant under both the Project and HDRA.

U. Wildfire

Development under the HDRA would be limited to approximately 5.5 acres of the Project site concentrated along Iris Avenue, west of the intersection of Iris Avenue and Chicago Avenue. According to Riverside County GIS, this portion of the Project site is not subject to wildland fire hazards. Neither the Project nor the HDRA would substantially impair an adopted emergency response plan or emergency evacuation plan; impacts would be less than significant, and the level of impact would be similar. Because the HDRA would be located on the portions of the Project site that are not subject to wildland fire hazards, the proposed Project's less-than-significant impacts (after mitigation) related to the exposure of future occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and the Project's less-than-significant impacts (after mitigation) and due to expose people or structures either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires would be reduced under the HDRA as compared to the Project.



Similarly, the Project's less-than-significant impacts (after mitigation) due to the installation or maintenance of fire protection related infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment would be avoided under the HDRA because the HDRA would not require Fuel Modification Zones (FMZs). Due to the topographic conditions of the Project site and surrounding areas, neither the Project nor the HDRA 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; impacts would be less than significant, and the level of impact would be similar.

V. Conclusion

As compared to the proposed Project, the HDRA would have decreased impacts under the issue areas of aesthetics, agriculture/forestry resources, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, noise, paleontological resources, public services, recreation, transportation, tribal cultural resources, utilities/service systems, and wildfire. The HDRA would have similar impacts in comparison to the Project under the issue areas of mineral resources and population/housing. The HDRA would result in increased impacts in comparison to the Project under the issue of land use and planning.

The HDRA generally would meet the Project's objectives, although to a lesser extent. The HDRA would be less effective than the proposed Project in meeting the Project's objective to efficiently develop an underutilized property with low-density residential uses with a range of lot sizes, but would be more effective in preserving, to the maximum extent feasible, areas on site that contain sensitive environmental resources, including major site drainages. The HDRA would meet the intent of the Project's objective to ensure land use compatibility with the surrounding community, even though the HDRA would not accommodate 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. The HDRA would meet the Project's objective to develop a residential community with a design that takes topographic, geologic, hydrologic, and environmental opportunities and constraints into consideration. Due to the reduction in the number of proposed dwelling units, the HDRA would be less effective than the proposed Project in increasing 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. While the HDRA would meet the Project's objective to assist Riverside County in meeting its Regional Housing Needs Assessment (RHNA) allocation, the HDRA would not meet the portion of the objective that seeks to develop developing low density residential uses. The HDRA would not meet the Project's objective 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, as it is anticipated the HDRA would not include a trail system or other recreational amenities.

6.3.4 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 above in 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.

Table 6-1 Alternatives to the Proposed Project -Comparison of Environmental Impacts

Environmental Topic	Proposed Project Significance of Impacts After Mitigation	Level of Impact Compared to the Proposed Project/Compliance with Project Objectives No Development Alternative (NDA)	No Project (Adopted Specific Plan) Alternative (NPA)	High Density Residential Alternative (HDRA)
Aesthetics	Less than Significant	Reduced	Reduced	Reduced
Agriculture and Forestry Resources	Significant and Unavoidable Direct and Cumulatively Considerable Impact	Reduced to Less-than-Significant Levels	Similar	Reduced, but not avoided
Air Quality	Less than Significant	Reduced	Reduced	Reduced
Biological Resources	Less than Significant	Reduced	Similar	Reduced
Cultural Resources	Less than Significant	Reduced	Similar	Reduced
Energy	Less than Significant	Reduced	Reduced	Reduced
Geology and Soils	Less than Significant	Reduced	Reduced	Reduced
Greenhouse Gas Emissions	Less than Significant	Reduced	Reduced	Reduced
Hazards and Hazardous Materials	Less than Significant	Reduced	Similar	Reduced
Hydrology and Water Quality	Less than Significant	Most Issues: Reduced Erosion/Siltation: Increased	Similar	Reduced
Land Use and Planning	Less than Significant	Reduced	Reduced	Increased
Mineral Resources	Less than Significant	Similar	Similar	Similar
Noise	Less than Significant	Reduced	Reduced	Reduced
Paleontological Resources	Less than Significant	Reduced	Similar	Reduced
Population and Housing	Less than Significant	Reduced	Reduced	Similar
Public Services	Less than Significant	Reduced	Reduced	Reduced
Recreation	Less than Significant	Reduced	Reduced	Reduced
Transportation	Significant and Unavoidable Direct and Cumulatively- Considerable Impacts	Reduced to Less-than-Significant Levels	Reduced to Less-than-Significant Levels	Reduced
Tribal Cultural Resources	Less than Significant	Reduced	Similar	Reduced
Utilities and Service Systems	Less than Significant	Reduced	Reduced	Reduced
Wildfire	Less-than-Significant	Mixed (No new buildings would be constructed on site, but the natural vegetation on site would be subject to wildland fire hazards)	Similar	Reduced
Objective 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.		No	Yes, but to a lesser extent	Yes, but to a lesser extent
Objective 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.		No	Yes	Yes

Environmental Topic	Proposed Project Significance of Impacts After Mitigation	Level of Impact Compared to the Proposed Project/Compliance with Project Objectives		
		No Development Alternative (NDA)	No Project (Adopted Specific Plan) Alternative (NPA)	High Density Residential Alternative (HDRA)
Objective C: To develop a residential community with a design that takes topographic, geologic, hydrologic, and environmental opportunities and constraints into consideration.		No	Yes	Yes
Objective D: 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.		No	Yes, but to a lesser extent	Yes, but to a lesser extent
Objective E: To assist Riverside County in meeting its Regional Housing Needs Assessment (RHNA) allocation by developing low density residential uses.		No	Yes, but to a lesser extent	Mixed: Yes the HDRA would assist the County in meeting its RHNA obligations, but no the HDRA would not include development of low density residential uses.
Objective F: To provide a system of public and community facilities, including recreational facilities, in an efficient and timely manner and meet the needs of Project residents and residents of surrounding communities.		No	Yes	No



7.0 REFERENCES

7.1 PERSONS INVOLVED IN THE PREPARATION OF THIS EIR

7.1.1 COUNTY OF RIVERSIDE PLANNING DIVISION

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7.2 DOCUMENTS APPENDED TO THIS EIR

The following reports, studies, and supporting documentation were used in preparing the Keller Crossing 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 92502.

Appendix A Notice of Preparation (NOP) and Written Comments on the NOP for Arroyo Vista.

Appendix B Urban Crossroads, Inc. 2023a. *Arroyo Vista Air Quality Impact Analysis*. April 27, 2023.

Appendix C1 ELMT Consulting, Inc. 2024a. *Habitat Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis*. January 2025.

Appendix C2 ELMT Consulting, Inc. 2024b. *Delineation of State and Federal Jurisdictional Waters*. January 2025.

Appendix C3 ELMT Consulting, Inc. 2024c. *Determination of Biologically Equivalent or Superior Preservation Report*. January 2025.

Appendix D1 ECORP Consulting, Inc. 2022. *Updated Phase 1 Cultural Resources Assessment for the Riverside Chicago Avenue Project, Riverside County, California*. April 2022.



- Appendix D2 ECORP Consulting, Inc. 2024. *Updated Phase I and Phase II Cultural Resources Assessment for the Riverside County Chicago Avenue Project*. July 2024.
- Appendix D3 ECORP Consulting, Inc. 2023. *Phase II Cultural Resources Assessment (Architectural History) for the Arroyo Vista Project, Unincorporated Riverside County, California*. June 2023.
- Appendix E Urban Crossroads, Inc. 2023d. *Arroyo Vista Energy Analysis*. April 27, 2023.
- Appendix F1 GeoTek, Inc. 2021a. *Updated Geotechnical Evaluation*. September 21, 2021.
- Appendix F2 Earth-Strata, Inc. 2015. *Revised Preliminary Geotechnical Interpretive Report*. April 27, 2015.
- Appendix G Urban Crossroads, Inc. 2023b. *Arroyo Vista Greenhouse Gas Analysis*. April 27, 2023.
- Appendix H GeoTek, Inc. 2021b2025. *Phase I and Limited Phase II Environmental Site Assessment*. ~~September 21, 2021~~May 22, 2025.
- Appendix I1 Rick Engineering Company. 2024a. *Drainage Study for Arroyo Vista*. May 8, 2024.
- Appendix I2 Rick Engineering Company. 2024b *Project Specific Water Quality Management Plan*. May 8, 2024.
- Appendix I3 Rick Engineering Company. 2024c *Hydraulic Analysis Report for Goldenstar Creek*. May 8, 2024.
- Appendix J Urban Crossroads, Inc. 2023f2025a. *Arroyo Vista Noise Impact Analysis*. ~~May 4, 2023~~June 23, 2025.
- Appendix K1 Urban Crossroads, Inc. 2023ab. *Arroyo Vista Vehicle Miles Traveled (VMT) Analysis*. January 12, 2023.
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- Appendix L1 Rick Engineering Company. 2023. *Arroyo Vista Fuel Modification Plan*. January 20, 2023.
- Appendix L2 CR Associates. 2023. *Arroyo Vista Fire Evacuation Analysis*. July 29, 2023.
- Appendix M Riverside County Airport Land Use Commission (ALUC), 2023. *Airport Land Use Commission (ALUC) Development Review, File No. ZAP1562MA23, Related File Nos. GPA220009 (General Plan Amendment), CZ2200031 (Change of Zone), TTM38510 (Tentative Tract Map)*



Appendix N T&B Planning, Inc., 2025. *General Plan Consistency Analysis for Arroyo Vista*. February 6, 2025.

Appendix O Agricultural Infeasibility Correspondence

7.3 DOCUMENTS INCORPORATED BY REFERENCE IN THIS EIR

The following reports, studies, and supporting documentation were used in the preparation of this EIR and are incorporated by reference within this EIR. A copy of the following reports, studies, and supporting documentation is a matter of public record and is generally available to the public at the location listed. Documents not available on-line are available for public review at the County of Riverside Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501.

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RIVERSIDE COUNTY PLANNING DEPARTMENT

Charissa Leach
Director

Agency Notice of Preparation of a Draft Environmental Impact Report

DATE: March 2, 2023

TO: Responsible/Trustee Agencies

The Riverside County Planning Department is currently reviewing a development application (herein, "Project") in the Lake Matthews/Woodcrest Area Plan of Riverside County. The Project is subject to compliance with the California Environmental Quality Act (CEQA). This notice is to inform public agencies and the general public that an Environmental Impact Report (EIR) will be prepared for the Project, and to solicit input as to the scope and content of the required EIR.

PROJECT CASE NO./TITLE: Arroyo Vista – General Plan Amendment No. 220009 (GPA220009), Change of Zone No. 2200031 (CZ2200031), and Tentative Tract Map No. 38510 (TTM38510)

PROJECT LOCATION AND DESCRIPTION: The proposed Project consists of applications for a General Plan Amendment (GPA220009), Change of Zone (CZ2200031), and Tentative Tract Map (TTM38510) to allow for the development of 232 single-family dwelling units on a 140.8-acre property located at the northwest corner of Iris Avenue and Chicago Avenue in the Lake Matthews/Woodcrest community of unincorporated Riverside County.

GPA220009 is a proposal to change the site's General Plan land use designation from "Rural Community – Very Low Density Residential (RC-VLDR)" to "Rural Community – Low Density Residential (RC-LDR)." CZ2200031 is a proposal to change the site's zoning classification from "Light Agriculture, 10-Acre Minimum Lot Size (A-1-10)" to "One Family Dwellings, 10,000 square-foot (s.f.) minimum lot size (R-1-10,000)." TTM38510 is a proposal to subdivide the 140.8-acre property to develop 232 residential lots on approximately 87.7 acres, open space (including a trailhead) on approximately 25.0 acres, water quality basins on 4.9 acres, a sewer lift station on 0.25 acre, and street improvements and right-of-way dedications on 23.0 acres. Governmental approvals requested by the Project Applicant from Riverside County to implement the Project consist of the following:

1. Adoption by resolution of General Plan Amendment No. 220009 (GPA220009)
2. Adoption by ordinance of Change of Zone No. 2200031 (CZ2200031)
3. Adoption by resolution of Tentative Tract Map No. 38510 (TTM38510)

LEAD AGENCY:

Riverside County Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409
Attn: Krista Mason, Urban Regional Planner IV

PROJECT SPONSOR:

Applicant: TTLC Riverside Chicago, LLC
Attn: Michael Torres
Address: 4350 Von Karman Avenue, Suite 200
Newport Beach, CA 92660

Pursuant to the California Environmental Quality Act, notice is given to responsible and interested agencies, that the Riverside County Planning Department plans to oversee the preparation on an Environmental Impact Report for the above-described project. The purpose of this notice is to solicit guidance from your agency as to the scope and content of the environmental information to be included in the EIR. Information in that regard should be submitted to this office as soon as possible, but **not later than April 3, 2023 or thirty (30) days** after receiving this notice.

Riverside Office · 4080 Lemon Street, 12th Floor
P.O. Box 1409, Riverside, California 92502-1409
(951) 955-3200 · Fax (951) 955-1811

Desert Office · 77-588 El Duna Court, Suite H
Palm Desert, California 92211
(760) 863-8277 · Fax (760) 863-7555

"Planning Our Future... Preserving Our Past"

SCOPE OF ANALYSIS: It is anticipated that the proposed Project would have the potential to result in significant impacts under the following issue areas. A detailed analysis of the following issue areas will be included in the forthcoming EIR:

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

PUBLIC SCOPING MEETING: A scoping meeting has been scheduled to include affected federal, State and local agencies, the proponent of the proposed Project, and other interested persons, to solicit input regarding the scope and content of information to be included in the EIR; as well as inform the public of the nature and extent of the proposed project, and to provide an opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR and help eliminate from detailed study issues found not to be important. The scoping meeting is not a public hearing on the merit of the proposed project and NO DECISION on the Project will be made. Public testimony is limited to identifying issues regarding the project and potential environmental impacts. The Project proponent will not be required to provide an immediate response to any concerns raised. The Project proponent will be requested to address any concerns expressed at the scoping meeting through revisions to the proposed Project and/or completion of a Final Environmental Impact Report, prior to the formal public hearing on the proposed Project. Mailed notice of the public hearing will be provided to anyone requesting such notification.

DATE OF SCOPING MEETING: APRIL 3, 2023

TIME OF SCOPING MEETING: 1:30 PM or as soon as possible thereafter

Information on how to participate in the hearing will be available on the Planning Department website at: <https://planning.rctlma.org/>. For further information regarding this project please contact Krista Mason, Urban and Regional Planner IV at (951) 955-1722 or email at kmason@rivco.org, or go to the County Planning Department's public hearing agenda web page at <http://planning.rctlma.org/PublicHearings.aspx>.

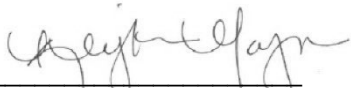
Please send all written correspondence to:

RIVERSIDE COUNTY PLANNING DEPARTMENT
Attn: Krista Mason, Urban and Regional Planner IV
P.O. Box 1409, Riverside, CA 92502-1409

If you have any questions, please contact Krista Mason, Urban Regional Planner IV at (951) 955-1722.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT



Krista Mason, Urban Regional Planner IV for John Hildebrand, Planning Director

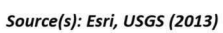


Source(s): Esri, Nearmap Imagery (2023), RCIT (2023)

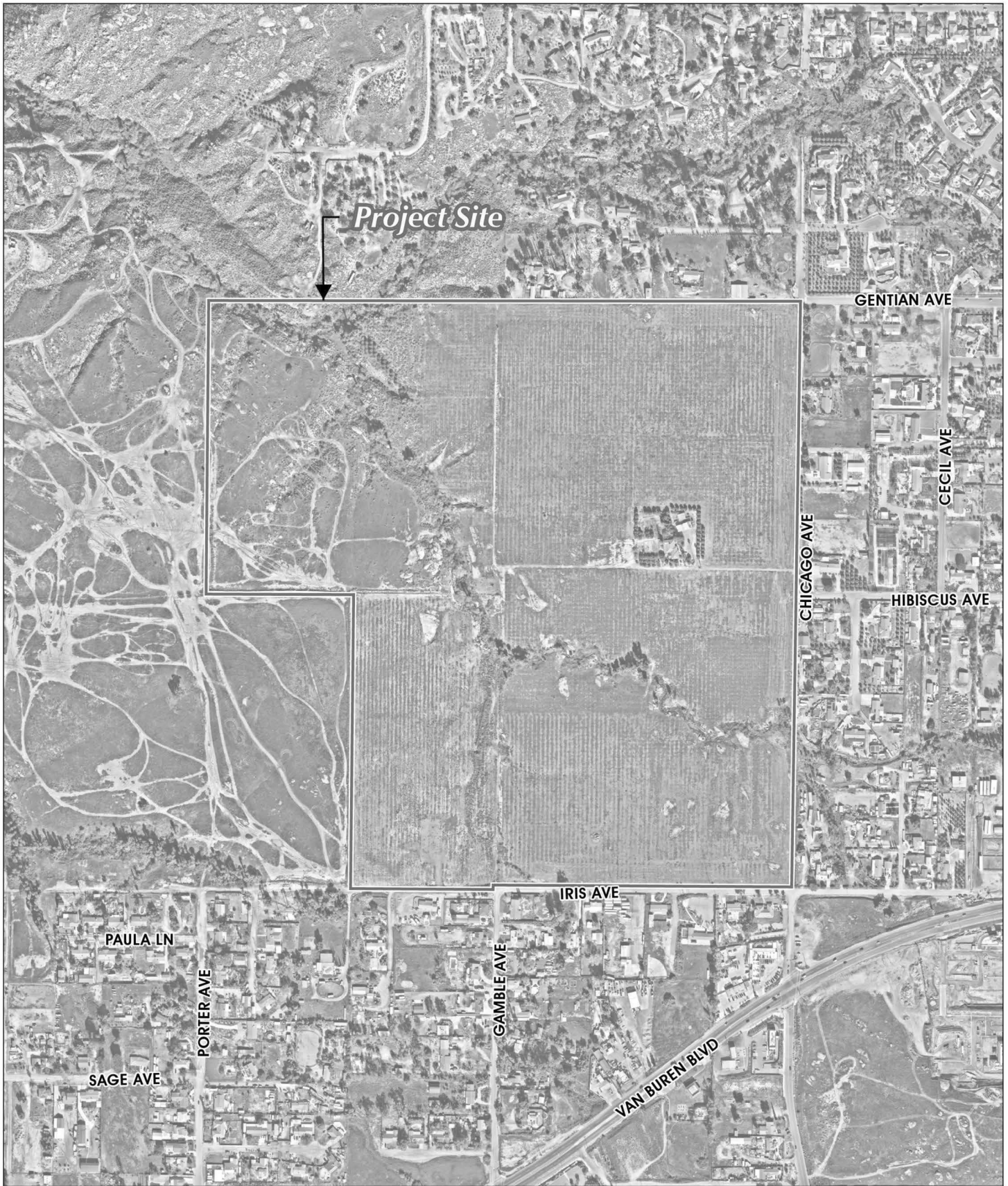
Figure 1



Vicinity Map

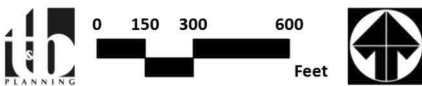


JN: 1214-001
Date: 02-21-2023



Source(s): Esri, Nearmap Imagery (2023)

Figure 3



JN: 1214-001
Date: 02-21-2023

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613

For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #**Project Title:** Arroyo Vista - General Plan Amendment No. 220009, Change of Zone No. 2200031, and Tentative Tract Map No. 38510Lead Agency: Riverside CountyContact Person: Krista Mason, Urban and Regional Planner IVMailing Address: P.O. Box 1409Phone: (951) 955-1722City: RiversideZip: 92502County: Riverside County**Project Location:** County: Riverside County City/Nearest Community: Lake Matthews/Woodcrest CommunityCross Streets: Northwest corner of Iris Avenue at Chicago AvenueZip Code: 92508Longitude/Latitude (degrees, minutes and seconds): 33 ° 53 ' 26 " N / 117 ° 21 ' 07 " W Total Acres: 140.8Assessor's Parcel No.: 245-300-001 and 245-300-004Section: 24Twp.: 3SRange: 5WBase: San BernardinoWithin 2 Miles: State Hwy #: NoneWaterways: NoneAirports: NoneRailways: NoneSchools: See Attachment**Document Type:**CEQA: ☒ NOP☐ Draft EIRNEPA: ☐ NOIOther: ☐ Joint Document☐ Early Cons☐ Supplement/Subsequent EIR☐ EA☐ Final Document☐ Neg Dec

(Prior SCH No.) _____

☐ Draft EIS☐ Other: _____☐ Mit Neg Dec

Other: _____

☐ FONSI**Local Action Type:**☐ General Plan Update☐ Specific Plan☒ Rezone☐ Annexation☒ General Plan Amendment☐ Master Plan☐ Prezone☐ Redevelopment☐ General Plan Element☐ Planned Unit Development☐ Use Permit☐ Coastal Permit☐ Community Plan☐ Site Plan☒ Land Division (Subdivision, etc.)☐ Other: _____**Development Type:**☒ Residential: Units 232 Acres 87.7☐ Office: Sq.ft. _____ Acres _____

Employees _____

☐ Transportation: Type _____☐ Commercial: Sq.ft. _____ Acres _____

Employees _____

☐ Mining: Mineral _____☐ Industrial: Sq.ft. _____ Acres _____

Employees _____

☐ Power: Type _____ MW _____☐ Educational: _____☐ Waste Treatment: Type _____ MGD _____☐ Recreational: _____☐ Hazardous Waste: Type _____☐ Water Facilities: Type _____ MGD _____☐ Other: _____**Project Issues Discussed in Document:**☒ Aesthetic/Visual☐ Fiscal☒ Recreation/Parks☒ Vegetation☒ Agricultural Land☒ Flood Plain/Flooding☒ Schools/Universities☒ Water Quality☒ Air Quality☒ Forest Land/Fire Hazard☐ Septic Systems☒ Water Supply/Groundwater☒ Archeological/Historical☒ Geologic/Seismic☒ Sewer Capacity☒ Wetland/Riparian☒ Biological Resources☒ Minerals☒ Soil Erosion/Compaction/Grading☒ Growth Inducement☐ Coastal Zone☒ Noise☒ Solid Waste☒ Land Use☒ Drainage/Absorption☒ Population/Housing Balance☒ Toxic/Hazardous☒ Cumulative Effects☐ Economic/Jobs☒ Public Services/Facilities☒ Traffic/Circulation☐ Other: _____**Present Land Use/Zoning/General Plan Designation:**

Agriculture (Orchards)/Light Agriculture, 10-Acre Min. Lot Size (A-1-10)/Rural Community – Very Low Density Residential (RC-VLDR)

Project Description: (please use a separate page if necessary)

See Attachment

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".

If you have already sent your document to the agency please denote that with an "S".

☒ Air Resources Board	☐ Office of Historic Preservation
☐ Boating & Waterways, Department of	☐ Office of Public School Construction
☐ California Emergency Management Agency	☐ Parks & Recreation, Department of
☐ California Highway Patrol	☐ Pesticide Regulation, Department of
☒ Caltrans District # <u>8</u>	☐ Public Utilities Commission
☐ Caltrans Division of Aeronautics	☒ Regional WQCB # <u>8</u>
☐ Caltrans Planning	☐ Resources Agency
☐ Central Valley Flood Protection Board	☐ Resources Recycling and Recovery, Department of
☐ Coachella Valley Mtns. Conservancy	☐ S.F. Bay Conservation & Development Comm.
☐ Coastal Commission	☐ San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
☐ Colorado River Board	☐ San Joaquin River Conservancy
☒ Conservation, Department of	☐ Santa Monica Mtns. Conservancy
☐ Corrections, Department of	☐ State Lands Commission
☐ Delta Protection Commission	☐ SWRCB: Clean Water Grants
☐ Education, Department of	☐ SWRCB: Water Quality
☐ Energy Commission	☐ SWRCB: Water Rights
☒ Fish & Game Region # <u>6</u>	☐ Tahoe Regional Planning Agency
☐ Food & Agriculture, Department of	☒ Toxic Substances Control, Department of
☐ Forestry and Fire Protection, Department of	☐ Water Resources, Department of
☐ General Services, Department of	☐ Other: _____
☐ Health Services, Department of	☐ Other: _____
☐ Housing & Community Development	
☒ Native American Heritage Commission	

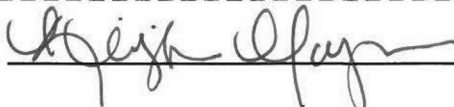
Local Public Review Period (to be filled in by lead agency)

Starting Date _____ Ending Date _____

Lead Agency (Complete if applicable):

Consulting Firm: T&B Planning, Inc.
Address: 3200 El Camino Real, Suite 100
City/State/Zip: Irvine, CA 92602
Contact: Jerrica Harding, AICP
Phone: (714) 505-6360 ext. 101

Applicant: TTLIC Riverside Chicago, LLC
Address: 4350 Von Karman Avenue, Suite 200
City/State/Zip: Newport Beach, CA 92660
Phone: (925) 331-7006

Signature of Lead Agency Representative:  Date: _____

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

**SUPPLEMENTAL INFORMATION FOR NOTICE OF COMPLETION & ENVIRONMENTAL DOCUMENT
TRANSMITTAL AND
SUMMARY FORM FOR ELECTRONIC DOCUMENT SUBMITTAL (FORM F)**

***Arroyo Vista – General Plan Amendment No. 220009, Change of Zone No. 2200031, and Tentative
Tract Map No. 38510***

Schools within 2 Miles

Woodcrest Elementary School, Frank Augustus Miller Middle School, Mark Twain Elementary School, Martin Luther King High School, Woodcrest Christian, Benjamin Franklin Elementary School, and Amelia Earhart Middle School.

Project Description

The proposed Project consists of applications for a General Plan Amendment (GPA220009), Change of Zone (CZ2200031), and Tentative Tract Map (TTM38510) to allow for the development of 232 single-family dwelling units on a 140.8-acre property located at the northwest corner of Iris Avenue and Chicago Avenue in the Lake Matthews/Woodcrest community of unincorporated Riverside County. GPA220009 is a proposal to change the site's General Plan land use designation from "Rural Community – Very Low Density Residential (RC-VLDR)" to "Rural Community – Low Density Residential (RC-LDR)." CZ2200031 is a proposal to change the site's zoning classification from "Light Agriculture, 10-Acre Minimum Lot Size (A-1-10)" to "One Family Dwellings, 10,000 square-foot (s.f.) minimum lot size (R-1-10,000)." TTM38510 is a proposal to subdivide the 140.8-acre property to develop 232 residential lots on approximately 87.7 acres, open space (including a trailhead) on approximately 25.0 acres, water quality basins on 4.9 acres, a sewer lift station on 0.25acre, and street improvements and right-of-way dedications on 23.0 acres. Governmental approvals requested by the Project Applicant from Riverside County to implement the Project consist of the following:

1. Adoption by resolution of General Plan Amendment No. 220009 (GPA220009)
2. Adoption by ordinance of Change of Zone No. 2200031 (CZ2200031)
3. Adoption by resolution of Tentative Tract Map No. 38510 (TTM38510)

Notice of Preparation

Notice of Preparation

To: State Clearinghouse

1400 Tenth Street

Sacramento, CA 95814

(Address)

From: Riverside County Planning Department

P.O. Box 1409

Riverside, CA 92502

(Address)

Subject: Notice of Preparation of a Draft Environmental Impact Report

Riverside County

_____ will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study (☐ is ☒ is not) attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

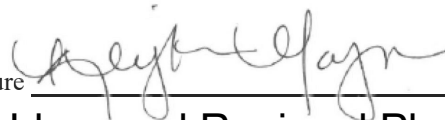
Please send your response to Krista Mason (Urban and Regional Planner IV) at the address shown above. We will need the name for a contact person in your agency.

Project Title: Arroyo Vista (GPA220009, CZ2200031, TTM38510)

Project Applicant, if any: TTLC Riverside Chicago, LLC

Date March 02, 2023

Signature



Title

Urban and Regional Planner IV

Telephone

(951) 955-1722

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

Summary Form for Electronic Document Submittal

Form F

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH #: _____

Project Title: Arroyo Vista (GPA220009, CZ2200031, TTM38510)

Lead Agency: Riverside County

Contact Name: Krista Mason

Email: kmason@rivco.org

Phone Number: (951) 955-1722

Project Location: Northwest corner of Iris Avenue and Chicago Avenue,
City

Riverside County
County

Project Description (Proposed actions, location, and/or consequences).

The proposed Project consists of applications for a General Plan Amendment (GPA220009), Change of Zone (CZ2200031), and Tentative Tract Map (TTM38510) to allow for the development of 232 single-family dwelling units on a 140.8-acre property located at the northwest corner of Iris Avenue and Chicago Avenue in the Lake Matthews/Woodcrest community of unincorporated Riverside County. GPA220009 is a proposal to change the site's General Plan land use designation from "Rural Community – Very Low Density Residential (RC-VLDR)" to "Rural Community – Low Density Residential (RC-LDR)." CZ2200031 is a proposal to change the site's zoning classification from "Light Agriculture, 10-Acre Minimum Lot Size (A-1-10)" to "One Family Dwellings, 10,000 square foot (s.f.) minimum lot size (R-1-10,000)." TTM38510 is a proposal to subdivide the 140.8-acre property to develop 232 residential lots on approximately 87.7 acres, open space (including a trailhead) on approximately 25.0 acres, water quality basins on 4.9 acres, a sewer lift station on 0.25 acre, and street improvements and right-of-way dedications on 23.0 acres.

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

The Draft EIR shall address the following environmental subject areas: Aesthetics; Agriculture and Forest Resources; Air Quality; Biological Resources; Cultural Resources; Energy; Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Noise; Paleontological Resources; Population and Housing; Public Services; Recreation; Transportation; Tribal Cultural Resources; Utilities and Service Systems; and Wildfire. Mitigation measures, if required, will be identified by the forthcoming EIR.

If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

There are no known areas of controversy regarding the Project at this time.

Provide a list of the responsible or trustee agencies for the project.

Santa Ana Regional Water Quality Control Board
South Coast Air Quality Management District
Riverside County Flood Control and Water Conservation District
South Coast Air Quality Management District
Western Municipal Water District

Additional responsible agencies, if any, will be identified as part of the forthcoming EIR.



Source(s): Esri, Nearmap Imagery (2023), RCIT (2023)

Figure 1





Source(s): Esri, USGS (2013)

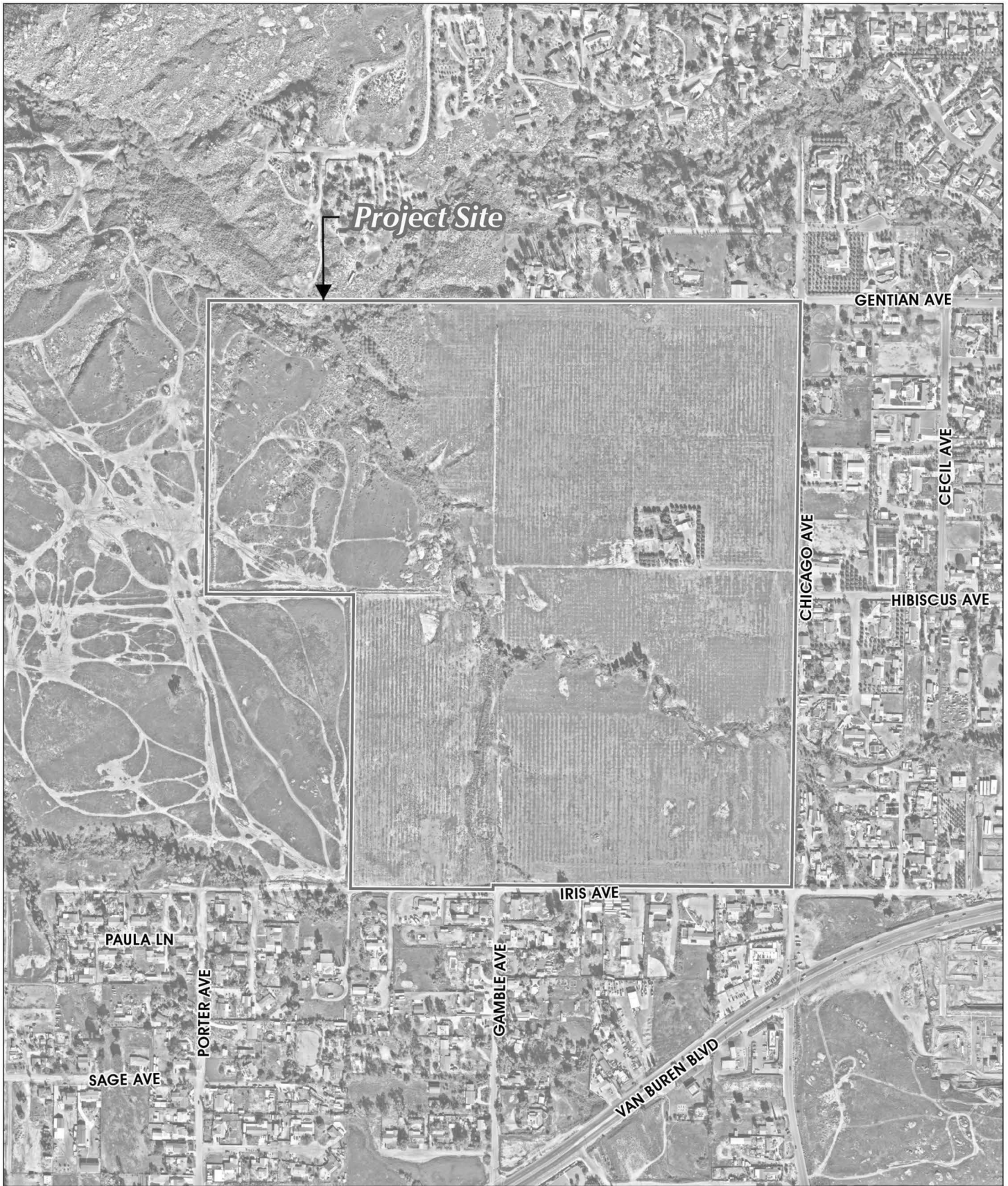
Figure 2



Arroyo Vista

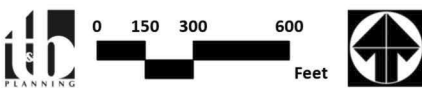
USGS Topographic Map

JN: 1214-001
Date: 02-21-2023



Source(s): Esri, Nearmap Imagery (2023)

Figure 3



JN: 1214-001
Date: 02-21-2023



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



April 3, 2023
Sent via email

Krista Mason
Riverside County
P.O. Box 1409
Riverside, CA 92501

Subject: Notice of Preparation of a Draft Environmental Impact Report
Arroyo Vista – General Plan Amendment No. 220009 (GPA220009),
Change of Zone No. 2200031 (CZ2200031), and Tentative Tract Map No.
38510 (TTM38510)
State Clearinghouse No. 2023030118

Dear Krista Mason:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the County of Riverside (County) for the Arroyo Vista General Plan Amendment No. 220009 (GPA220009), Change of Zone No. 2200031 (CZ2200031), and Tentative Tract Map No. 38510 (TTM38510) (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT LOCATION

The proposed Project is located in Riverside County, at the northwest corner of Iris Avenue and Chicago Avenue in the Lake Matthews/Woodcrest community of unincorporated Riverside County, Assessor's Parcel Numbers 245-300-001 and 245-300-004. Project latitude 33.88722, longitude -117.348717.

PROJECT DESCRIPTION SUMMARY

The Project would consist of a General Plan Amendment (GPA 220009), Change of Zone (CZ 2200031), and Tentative Tract Map (TTM38510) to allow for the development of 232 single-family dwelling units on a 140.8-acre property. GPA 220009 is a proposal to change the site's General Plan land use designation from "Rural Community – Very Low Density Residential (RC-VLDR)" to "Rural Community – Low Density Residential (RC-LDR)." CZ2200031 is a proposal to change the site's zoning classification from "Light Agriculture, 10-acre minimum lot size (A-1-10)" to "One Family Dwellings, 10,000 square foot minimum lot size (R-1-10,000)." TTM38510 is a proposal to subdivide the 140.8-acre property to develop 232 residential lots on approximately 87.7 acres, open space (including a trailhead) on approximately 25.0 acres, water quality basins on 4.9 acres, a sewer lift station on 0.25-acres, and street improvements and right-of-way dedications on 23.0 acres. The Project is not within a criteria cell, however it is within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), including survey area for Burrowing Owl.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. The comments and recommendations are also offered to enable the CDFW to adequately review and comment on the proposed Project with respect to the Project's consistency with the MSHCP.

CDFW recommends that the forthcoming DEIR address the following:

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.

CDFW recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the Project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009²). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project. CDFW's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted at (916) 322-2493 or CNDDDB@wildlife.ca.gov or <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data> to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed Project.

CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the Project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to

² Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2nd ed. California Native Plant Society Press, Sacramento, California. <http://vegetation.cnps.org/>

be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish & G. Code, § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific/MSHCP surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.

Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018³).
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).
6. A full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project. To ensure that Project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by zoning of development projects or other Project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address Project-related changes on drainage patterns and water quality within, upstream, and downstream of the Project

³ CDFW, 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities, State of California, California Natural Resources Agency, Department of Fish and Wildlife: March 20, 2018 (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>)

site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.

2. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).
3. An evaluation of impacts to on-site and adjacent open space lands from both the construction of the Project and any long-term operational and maintenance needs.
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The DEIR should analyze the cumulative effects of the plan's land use designations, policies, and programs on the environment. Please include all potential direct and indirect Project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Alternatives Analysis

CDFW recommends the DEIR describe and analyze a range of reasonable alternatives to the Project that are potentially feasible, would "feasibly attain most of the basic objectives of the Project," and would avoid or substantially lessen any of the Project's significant effects (CEQA Guidelines § 15126.6[a]). The alternatives analysis should also evaluate a "no project" alternative (CEQA Guidelines § 15126.6[e]).

Objectives

Section 15124(b) of the CEQA Guidelines requires that the project description contain a clear statement of the project objectives. CDFW recommends that the DEIR should include an objective to demonstrate consistency with the MSHCP, including the biological issues and considerations for Subunit 3 (Temescal Wash; page 3-456 of the MSHCP). These objectives include, but are not limited to, conservation of existing wetlands and upland habitat adjacent to Temescal Wash as well as maintaining a continuous linkage along Temescal Wash.

Mitigation Measures for Project Impacts to Biological Resources

The DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The County should assess all direct, indirect, and cumulative impacts that are expected to occur as a result of the implementation of the Project and its long-term operation and maintenance. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time. Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the Lead Agency include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species.
2. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.
3. *California Species of Special Concern (CSSC)*: CSSC status applies to animals generally not listed under the federal Endangered Species Act or the CESA, but which nonetheless are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. CSSCs should be considered during the environmental review process. CSSC that have the potential or have been documented to occur within or adjacent to the Project area, including, but not limited to: burrowing owl, coast horned lizard, coastal California gnatcatcher, California glossy snake, red-diamond rattlesnake, western mastiff bat, and western spadefoot toad.
4. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail. Where habitat preservation

is not available onsite, offsite land acquisition, management, and preservation should be evaluated and discussed in detail.

The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR. CEQA Guidelines section 15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 struck down mitigation measures which required formulating management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete (*Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d. 296; *Gentry v. County of Murrieta* (1995) 36 Cal. App. 4th 1359; *Endangered Habitat League, Inc. v. County of Orange* (2005) 131 Cal. App. 4th 777).

CDFW recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted by the Project. Furthermore, in order for mitigation measures to be effective, they need to be specific, enforceable, and feasible actions that will improve environmental conditions.

5. **Habitat Revegetation/Restoration Plans:** Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in advance of Project impacts in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate.

Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project; examples could include retention of woody material, logs, snags, rocks, and brush piles.

6. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act.

CDFW recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. If pre-construction surveys are proposed in the DEIR, the CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

7. *Moving out of Harm's Way*: To avoid direct mortality, CDFW recommends that the lead agency condition the DEIR to require that a CDFW-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-disturbing activities to move out of harm's way special status species or other wildlife of low or limited mobility that would otherwise be injured or killed from Project-related activities. Movement of wildlife out of harm's way should be limited to only those individuals that

would otherwise be injured or killed, and individuals should be moved only as far as necessary to ensure their safety (i.e., CDFW does not recommend relocation to other areas). Furthermore, it should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss.

8. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in “take” (California Fish and Game Code Section 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of State-listed CESA species, either through construction or over the life of the Project. It is the policy of CESA to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. The California Fish and Game Code requires that CDFW comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the DEIR addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of CESA.

Western Riverside County Multiple Species Habitat Conservation Plan

CDFW issued Natural Community Conservation Plan Approval and Take Authorization for the Western Riverside County MSHCP per Section 2800, *et seq.*, of the California Fish and Game Code on June 22, 2004. The MSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit.

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the MSHCP please go to: <https://www.wrc-rca.org/>.

The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP. To be considered a covered activity, Permittees need to demonstrate that proposed actions are consistent with the MSHCP, the Permits, and the Implementing Agreement. The County of Riverside is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. To demonstrate consistency with the MSHCP, as part of the CEQA review, the County shall ensure the Project implements the following:

1. Pays Local Development Mitigation Fees and other relevant fees as set forth in Section 8.5 of the MSHCP.
2. Demonstrates compliance with the HANS process (MSHCP Section 6.1.1) or equivalent process to ensure application of the Criteria and thus, satisfaction of the local acquisition obligation.
3. Demonstrates compliance with the policies for 1) the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, set forth in Section 6.1.2 of the MSHCP; 2) the policies for the Protection of Narrow Endemic Plant Species set forth in Section 6.1.3 of the MSHCP; 3) compliance with the Urban/Wildlands Interface Guidelines as set forth in Section 6.1.4 of the MSHCP; 4) the policies set forth in Section 6.3.2 and associated vegetation survey requirements identified in Section 6.3.1; and 5) compliance with the Best Management Practices and the siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP.

Following this sequential identification of the relationship of the Project to the MSHCP the DEIR should then include an in-depth discussion of the Project in the context of these aforementioned elements, and as mentioned, examine how the Project might contribute to, or conflict with, the conservation criteria of the MSHCP.

Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools.

The procedures described in Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools section (MSHCP Section 6.1.2) are to ensure that the biological functions and values of these areas are maintained throughout the MSHCP area. Additionally, this process helps identify areas to consider for priority acquisition, as well as those functions that may affect downstream values related to Conservation of Covered Species within the MSHCP Conservation Area. The assessment of riparian/riverine and vernal pool resources may be completed as part of the CEQA review process as set forth in Article V of the State CEQA Guidelines. However, the MSHCP identifies that the U.S. Fish and Wildlife Service and CDFW shall be notified in advance of approval of public or private projects of draft determinations for the biologically equivalent or superior determination findings associated with the Protection of Wetland Habitats and Species policies presented in Section 6.1.2 of the MSHCP (MSHCP Section 6.11). As required by MSHCP, completion of the DBESP process prior to adoption of the

environmental document ensures that the project is consistent with the MSHCP and provides public disclosure and transparency during the CEQA process by identifying the project impacts and mitigation for wetland habitat, a requirement of CEQA Guidelines, §§ 15071, subds.(a)-(e).

The MSHCP identifies that assessment of these areas include identification and mapping of riparian/riverine areas and vernal pools. The assessment shall consider species composition, topography/ hydrology, and soil analysis, where appropriate. The documentation for the assessment shall include mapping and a description of the functions and values of the mapped areas with respect to the species identified in Section 6.1.2 of the MSHCP. Factors to be considered include hydrologic regime, flood storage and flood-flow modification, nutrient retention and transformation, sediment trapping and transport, toxicant trapping, public use, wildlife Habitat, and aquatic Habitat.

The MSHCP identifies that for mapped riparian/riverine and vernal pool resources that are not included in the MSHCP conservation area, applicable mitigation under CEQA, shall be imposed by the Permittee (in this case the County). Further, the MSHCP identifies that to ensure the standards in Section 6.1.2 are met, the Permittee shall ensure that, through the CEQA process, project applicants develop project alternatives demonstrating efforts that first avoid, and then minimize direct and indirect effects to the wetlands mapped pursuant to Section 6.1.2. If an avoidance alternative is not feasible, a practicable alternative that minimizes direct and indirect effects to riparian/riverine areas and vernal pools and associated functions and values to the greatest extent possible shall be selected. Those impacts that are unavoidable shall be mitigated such that the lost functions and values as they relate to Covered Species are replaced as through the Determination of Biologically Equivalent or Superior Preservation (DBESP). The County is required to ensure the Applicant completes the DBESP process prior to completion of the DEIR to demonstrate implementation of MSHCP requirements in the CEQA documentation.

The MSHCP's policy for the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (MSHCP Section 6.1.2) identifies that if riparian/riverine habitat is avoided then measures should be incorporated into the Project design to ensure the long-term conservation of the areas to be avoided, and associated functions and values, through the use of deed restrictions, conservation easement, or other appropriate mechanisms. CDFW requests that to demonstrate consistency with the MSHCP, the County should condition the Project Applicant to record a deed restrictions, conservation easement, or other appropriate mechanisms over avoided riparian/riverine resources.

The MSHCP identifies that treatment of edge effects should be addressed as part of the avoidance and minimization process to ensure avoided riparian/riverine areas maintain long-term conservation values (MSHCP Section 6.1.2, page 6-24).

In addition, CDFW recommends that the DEIR includes descriptions and designs for crossings sized to span the 100-year floodplain for any streams or wetlands that are found and may be impacted during Project activities.

Burrowing Owl (*Athene cunicularia*)

The Project site has the potential to provide suitable foraging and/or nesting habitat for burrowing owl. Take of individual burrowing owls and their nests is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5 and 3513. Take is defined in Fish and Game Code section 86 as “hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill.”

CDFW recommends that the County follow the survey instructions in the “Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area”⁴. The Survey Instructions specify that first a habitat assessment is conducted. If suitable habitat is not found on site, simply reporting the site is disturbed or under agricultural/dairy use is not acceptable. A written report must be provided detailing results of the habitat assessment with photographs and indicating whether or not the project site contains suitable burrowing owl habitat. If suitable habitat is found, then focused surveys at the appropriate time of year (March 1 to August 31), time of day, and weather conditions must be completed. Surveys will not be accepted if they are conducted during rain, high winds (> 20 mph), dense fog, or temperatures over 90 °F. The surveys must include focused burrow surveys and burrowing owl surveys. For the focused burrow surveys, the location of all suitable burrowing owl habitat, potential owl burrows, burrowing owl sign, and any owls observed should be recorded and mapped, including GPS coordinates in the report. The focused burrowing owl surveys include site visits on four separate days. CDFW recommends that the site visits are conducted at least a week apart to avoid missing owls that may be using the site. Finally, CDFW recommends the report also include an impact assessment evaluating the extent to which burrowing owls and their habitat may be impacted, directly or indirectly by Project activities. A final report discussing the survey methodology, transect width, duration, conditions, and results of the Survey shall be submitted to the RCA and the County.

Habitat assessments are conducted to evaluate the likelihood that a site supports burrowing owl. Burrowing owl surveys provide information needed to determine the potential effects of proposed projects and activities on burrowing owls, and to avoid take in accordance with Fish and Game Code sections 86, 3503, and 3503.5. Impact assessments evaluate the extent to which burrowing owls and their habitat may be impacted, directly or indirectly, on and within a reasonable distance of a proposed CEQA project activity or non-CEQA project.

4 https://www.wrc-rca.org/species/survey_protocols/burrowing_owl_survey_instructions.pdf

Additionally, CDFW recommends that the County review and follow requirements for burrowing owl outlined in the MSHCP, specifically Section 6.3.2 (Additional Survey Needs and Procedures) and Appendix E (Summary of Species Survey Requirements). Appendix E of the MSHCP outlines survey requirements, actions to be taken if survey results are positive, and species-specific conservation objectives, among other relevant information.

Lake and Streambed Alteration Program

Based on review of material submitted with the NOP, drainage features may traverse some of the parcels within the Project's scope. Depending on how the Project is designed and constructed, it is likely that the Project applicant will need to notify CDFW per Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream, or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream, or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code § 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To submit a Lake or Streambed Alteration notification, please go to <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>.

ADDITIONAL COMMENTS AND RECOMMENDATIONS

Native Landscaping

To ameliorate the water demands of this Project, CDFW recommends incorporation of water-wise concepts in Project landscape design plans. In particular, CDFW recommends xeriscaping with locally native California species, and installing water-efficient and

targeted irrigation systems (such as drip irrigation). Native plants support butterflies, birds, reptiles, amphibians, small mammals, bees, and other pollinators that evolved with those plants, more information on native plants suitable for the Project location and nearby nurseries is available at CALSCAPE: <https://calscape.org/>. Local water agencies/districts and resource conservation districts in your area may be able to provide information on plant nurseries that carry locally native species, and some facilities display drought-tolerant locally native species demonstration gardens (for example the Riverside-Corona Resource Conservation District in Riverside). Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: <https://saveourwater.com/>.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). Information can be submitted online or via completion of the CNDDDB field survey form at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a DEIR for the Arroyo Vista General Plan Amendment No. 220009 (GPA220009), Change of Zone No. 2200031 (CZ2200031), and Tentative Tract Map No. 38510 (TTM38510) Project (SCH No. 2023030118) and recommends that the County of Riverside address the CDFW's comments and concerns in the forthcoming DEIR. Questions regarding this letter or further coordination should be directed to John Dempsey, Environmental Scientist, at John.Dempsey@wildlife.ca.gov.

Krista Mason, Urban Regional Planner IV
County of Riverside
April 3, 2023
Page 15 of 15

Sincerely,

DocuSigned by:

84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

ec:

Heather Pert, Senior Environmental Scientist Supervisor
Inland Deserts Region
Heather.Pert@wildlife.ca.gov

Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@opr.ca.gov

Tricia Campbell (Western Riverside County Regional Conservation Authority)
Director of Reserve Management and Monitoring
tcampbell@rctc.org

March 30, 2023

To: Riverside County Planning Department

Attn: Krista Mason, Urban and Regional Planner IV

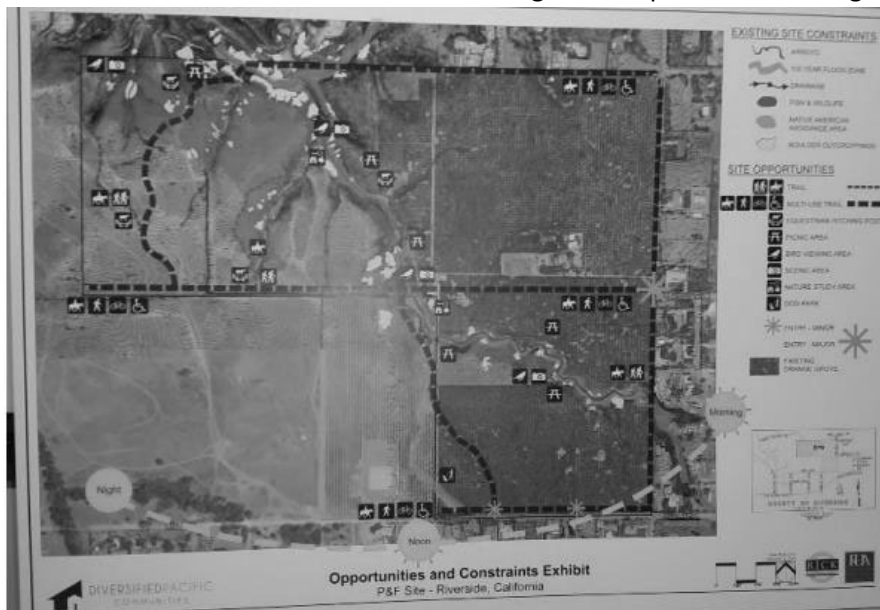
From: Kathleen Crook

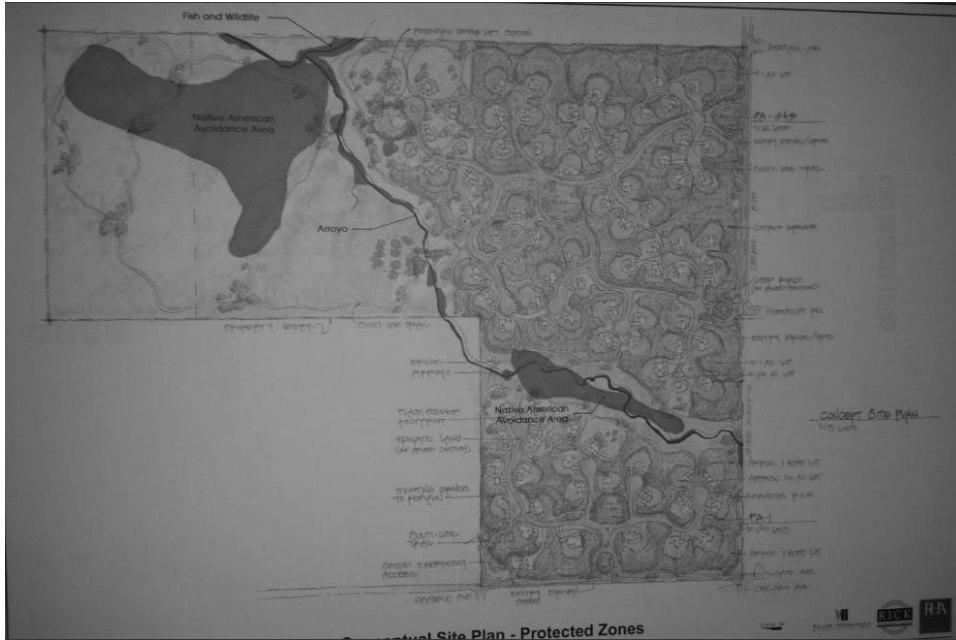
Re: Arroyo Vista Project Environment Impact Report Comments and comments related to TTM38510, GPA220009 and CZ2200031

Dear Ms. Mason,

I have several concerns regarding the Arroyo Vista Project Proposed Development which are summarized below along with detailed comments in the following pages:

1. **Water run-off from developing the project property.**
2. **Preserving the unique features of the Woodcrest area as a community** “overwhelmingly rural in character, with a strong equestrian presence”. As stated in the Riverside County General Plan for the Woodcrest area, the “intent is to enhance and/or preserve the identity, character and features of this unique area”. This can only be achieved by matching the Foundation Component/Land Use Designation at a minimum of Low Density Residential (RC-LDR) 0.5 acre minimum. The proposed rezoning of the entire project property to One Family Dwellings, 10,000 square-foot (s.f.) minimum lot size (R-1-10,000) does not support this.
3. **Native American significance on the property.** A previous study was conducted back in 2016 and it already identified areas of Native American significance and significant rock outcroppings that were to be avoided. These areas are identified in orange on the pictures following:





Additionally, when the majority of the Orange trees from the project property were removed in 2020, it revealed that there are many more significant rock outcroppings that were not identified back in 2016. There may be more Native American significance visible as well. The new study should identify all these protected areas and be included in the as areas to avoid.

4. **Identification of all rock outcroppings which should be avoided.** Again, when the majority of the Orange trees from the project property were removed in 2020, it revealed that there are many more significant rock outcroppings that were not identified back in 2016. The new study should identify all these rock outcroppings and included in the as areas to avoid.
5. **Conducting a comprehensive species study, cultural analysis by an archeologist and biologist study related to the environmental impact of this project.**
6. **Street Lighting within the development.**

Item #1: Water run-off from developing the project property.

My Family lives at 15765 Cartwright Drive, Riverside. The back of my house (West border) shares a property line with the proposed Arroyo Vista Project. One of my biggest Environmental Impact concerns involves where all the water run-off from Hibiscus Avenue and Cartwright Drive will end up once houses are developed on this property.

Back in 1977, when the houses on Cartwright Drive were built, the County of Riverside must have had different standards to control water drainage. They allowed all the water from Cartwright Drive to travel to a culvert in front of my house that then drains along the South border of my property (in between my house and my neighbor's property). I have included a diagram below for your reference. The water ends up draining to the back of my property to an 8" clay pipe that goes underground and into the project property where it can freely drain into the ground and be reclaimed into the water table.



Drainage Culvert under Cartwright Drive and in front of my house



Hibiscus Avenue Drainage and Sandbags to prevent my backyard from flooding.



The Environmental Impact Report will need to address how the Arroyo Vista Project will control the water run-off that comes from my existing neighborhood via Hibiscus Avenue and Cartwright Drive. How will they or the County control the water that now ends up in my backyard and drains into a pipe into the project property? Once they develop houses on that land and remove or block the current path the water takes through the drain pipe in my backyard or directly into the property off of Hibiscus Avenue, where is the water going to end up and what are they going to do to ensure my house and property does not flood every time it rains? There are no curbs or gutters in my neighborhood to control the water run-off.

Additionally, there is an existing natural drainage V in the North West corner of the project property. The homeowners on the North of the development will be impacted by the development and once it rains, the natural drainage will erode due to the increased water run-off and other areas will be polluted by sewage and water that has nowhere to drain due to the loss of open land where houses and streets are built. The study should address how the water will be controlled in this area.

Item #2: Preserving the unique features of the Woodcrest area as a community

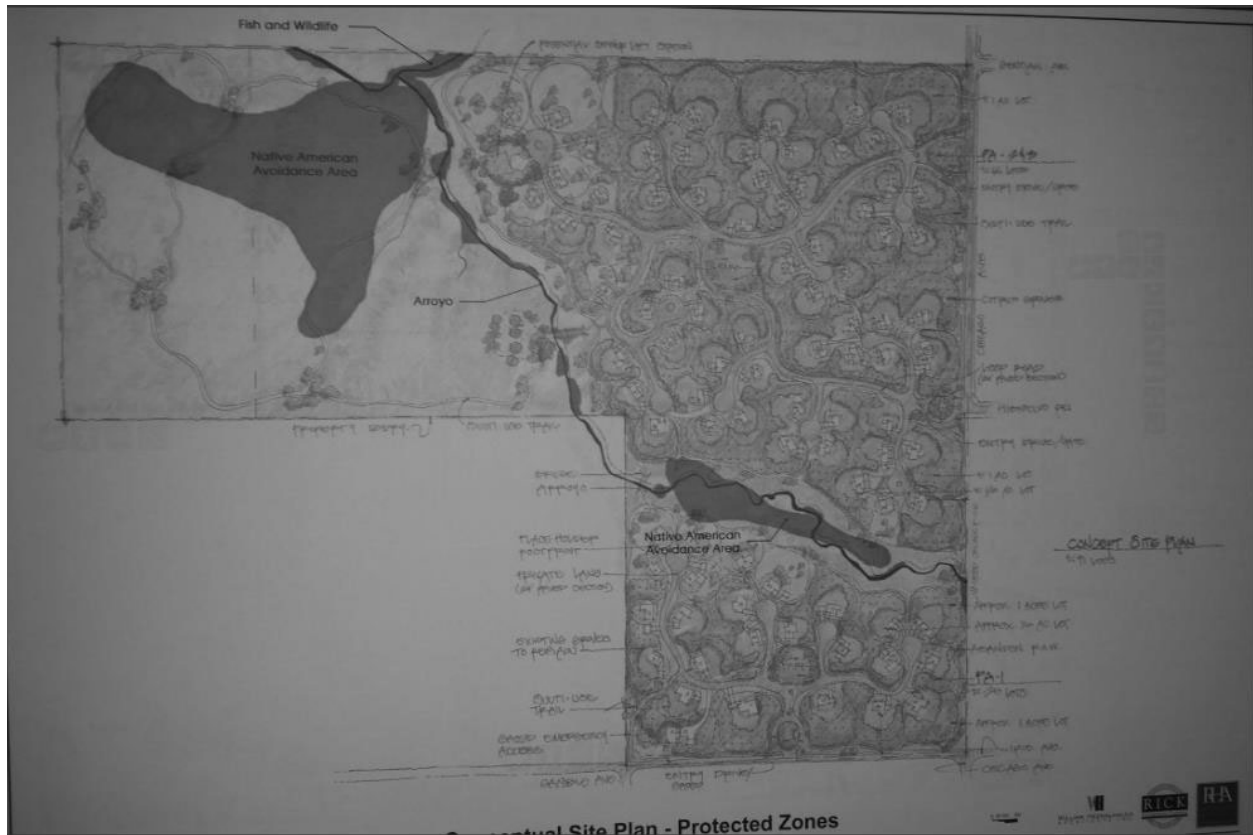
Another opposition I have is the proposed rezoning of the entire project property to One Family Dwellings, 10,000 square-foot (s.f.) minimum lot size (R-1-10,000). If this rezoning were approved, even though the Developer of this Project and TTM328510 proposes to only build 232 houses, I calculated they could revise their TTM and build up to 382 houses on the 87.7 acres currently designated for housing. This number could increase to 613 houses on the 140.7 acres if they use the “clustering method” and later modify their TTM. This would destroy our rural community consisting of houses on a minimum of 1 acre.

I participated in all the meetings this new developer The True Life Companies had with the Community and we discussed our concerns and the impact the development will have on our properties, way of life and the community we live in. The developer listened to the community and drafted TTM38510 as a result of these meetings. However, rezoning the entire project to be R-1-10,000 is not something that was discussed and I do not support it. It scares me because there is no guarantee they will only build 232 houses. Designation should comply with the general plan and be a minimum of Low Density Residential (RC-LDR) 0.5 acre minimum. This rezoning request for R-1-10,000 should be contingent on the current TTM and revoked if any modifications are made to add more than 232 houses.



Item #3: Native American significance on the property

A previous developer had already identified some Native American areas that must be avoided. At the time that report was drafted the Orange Trees were still on the project property but have since been removed. This has exposed additional rock outcroppings that need to be investigated to confirm if any additional Native American significance or artifacts exist.



Item #4: Identification of all rock outcroppings which should be avoided.

I have included a satellite view map and circled in red the areas and rock outcroppings that are now visible since the Orange Grove was removed which I feel should be investigated.

This report should carefully research all rock outcroppings and determine their Native American significance and identify any artifacts that must be preserved.



0...

Item #5: Conducting a comprehensive species study, cultural analysis by an archeologist and biologist study related to the environmental impact of this project.

The current project property still houses a multitude of animals which I have personally observed because they often end up on my property or are viewable from my property. The current owner of the project property chopped down the beautiful orange grove in August 2020 and I believe killed a lot of the animals in the process. However, some survived and are now thriving in their new habitat.

I have witnessed the following animals on this property: “

1. Various amphibians in the project property such as frogs and salamanders.
2. Various reptiles including the California King Snake, garter snake, gopher snake and lots of different lizards. Some have bright blue colors and others copper colors with long sleek bodies.
3. Various birds including Hawks, Falcons, Woodpeckers, Vultures, Doves, Bluebirds, Robins, Roadrunners and Owls. They visit the trees in my front and back yard and use the project property and Arroyo for hunting.
4. Various rodents including ground squirrels, moles, gophers, Norway rats, mice and even a kangaroo rat which I found and released after taking a picture of it (below).
5. Large mammals such as the Coyotes use the Arroyo regularly to travel and hunt on the property and I usually hear them yelping to each other about 10 times per month.
6. I have seen opossums and raccoons on the project property.
7. I also observed water life in the year-round pools that exist in the natural waterway that runs through the property. I have seen crayfish/crawdads and small fish in those pools.

I request the report carefully research the wildlife that exists on the project property to identify any that are protected and address the impact the building of houses and paving of land will have on the wildlife population. The natural Arroyo that runs through the property is beautiful and should be protected and preserved.



Owl's visiting my trees at night.



Kangaroo rat and birds visiting my property.

5. Street Lighting within the development

There are very few street lights existing in the surrounding area. The homeowners appreciate seeing the stars and City Lights at the bottom of the hill at night and want to make sure the street lighting located within and leading to the development will not illuminate their properties, shine into their bedroom windows and prevent viewing the beautiful night skies. There is an existing housing tract located within the Woodcrest area (bordered by Chicago, Gentian, Ridgeway and Kross) that serves as a perfect example for the proper amount of street lighting for safety without overpowering the night skies. The picture below demonstrates how rural Woodcrest is compared to a City development it is adjacent to.



I hope these comments will all be addressed in the Environmental Impact Report or in the scoping meeting and the rural, equestrian community of Woodcrest will not be destroyed by this development.

If you have any questions, please contact me at 714-423-4868.

Kathleen Crook



MARCH 13, 2023

VIA EMAIL: KMASON@RIVCO.ORG

Riverside County Planning Department
Attn: Krista Mason, Urban Regional Planner IV
P.O. Box 1409
Riverside, CA 92502-1409

Dear Ms. Mason:

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE ARROYO VISTA PROJECT, SCH# 2023030118

The Department of Conservation's (DOC) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation of an Environmental Impact Report for the Arroyo Vista Project (Project). The Division monitors farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's potential impacts on agricultural land and resources.

Project Description

The proposed Project consists of applications for a General Plan Amendment (GPA220009), Change of Zone (CZ2200031), and Tentative Tract Map (TTM38510) to allow for the development of 232 single-family dwelling units on a 140.8-acre property located at the northwest corner of Iris Avenue and Chicago Avenue in the Lake Matthews/Woodcrest community of unincorporated Riverside County.

Comments

The conversion of agricultural land represents a permanent reduction and significant impact to California's agricultural land resources. CEQA requires that all feasible and reasonable mitigation be reviewed and applied to projects. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.

All mitigation measures that are potentially feasible should be included in the project's environmental review. A measure brought to the attention of the lead agency should not be left out unless it is infeasible based on its elements.

Consistent with CEQA Guidelines, DOC recommends the consideration of agricultural conservation easements, among other measures, as potential mitigation. (See Cal. Code Regs., tit. 14, § 15370 [mitigation includes “compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.”])

Mitigation through agricultural easements can take at least two forms: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands should not be limited strictly to lands within the project's surrounding area.

A helpful source for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

[California Council of Land Trusts](#)

Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered. Indeed, the recent judicial opinion in *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814 (“KG Farms”) holds that agricultural conservation easements on a 1 to 1 ratio are not alone sufficient to adequately mitigate a project's conversion of agricultural land. KG Farms does not stand for the proposition that agricultural conservation easements are irrelevant as mitigation. Rather, the holding suggests that to the extent they are considered, they may need to be applied at a greater than 1 to 1 ratio, or combined with other forms of mitigation (such as restoration of some land not currently used as farmland).

Conclusion

DOC recommends further discussion of the following:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.

- Proposed mitigation measures for all impacted agricultural lands within the proposed project area.

Thank you for giving us the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Arroyo Vista Project. Please provide DOC with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at Farl.Grundy@conservation.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Monique Wilber".

Monique Wilber

Conservation Program Support Supervisor

April 3, 2023

RAMV
Debbie Walsh
PO Box 2244
Perris, CA 92572

Riverside County Planning Director
4080 Lemon Street, 1st Floor
Riverside, CA 92502

Attn: Principal Planner Krista Mason kmason@rivco.org:

RE: Scoping Meeting.

General Plan Amendment No. 220009, Change of Zone No. 2200031, Tentative Parcel Map No. 38510.

PROJECT LOCATION AND DESCRIPTION: The proposed Project consists of applications for a General Plan Amendment, Change of Zone, and Tentative Parcel Map for proposed development of 232 residential lots on 140.8-acres. The 232 residential lots will be clustered on 87.7 acres. The smaller lots (10,890 – 14,520 square foot lots) will be clustered within the internal areas and the larger ½ to 1 acre lots will be along the north, east, northwest and southern project boundaries to buffer the site from the surrounding rural residential neighborhoods. Approximately 25 acres will be designated natural open space including a trailhead, 4.9 acres for water quality basins, a sewer lift station on 0.25-acre, and street improvements and right-of-way dedications on approximately 23.0 acres. Recreational trails measuring between 10 and 16 feet in width will be provided adjacent to the natural drainage area.

This Project requires a Foundation General Plan Amendment.

The Project proposes to amend the zoning for a number of parcels from A-1 to R-1. The Project has not requested a Foundation General Plan Amendment as required under the Riverside County General Plan. Therefore this Project must request a Foundation General Plan Amendment before moving forward. This Project also must include an EIR.

The Foundation General Plan Amendment process takes place every 8 years during the General Plan Update.

The County “must” wait until the Foundation General Plan Amendment Process starts before this Project can move forward.

The Project zone changes being requested require a Foundation GPA. The Woodcrest area consists of rural land uses with one acre minimum lot sizes. The proposed Project is requesting lots sizes of 10,000 sq ft. Less than one quarter of an acre.

Woodcrest is designated as a Rural Community.

ATTACHMENT A

General Plan

Land Use Designations Summary

Foundation Component	Area Plan Land Use Designation	Building Intensity Range (du/ac or FAR) ^{1, 2, 3, 4}	Notes
Agriculture	Agriculture (AG)	10 ac min.	- Agricultural land including row crops, groves, nurseries, dairies, poultry farms, processing plants, and other related uses. - One single-family residence allowed per 10 acres except as otherwise specified by a policy or an overlay.
Rural	Rural Residential (RR)	5 ac min.	- Single-family residences with a minimum lot size of 5 acres. - Allows limited animal keeping and agricultural uses, recreational uses, compatible resource development (not including the commercial extraction of mineral resources) and associated uses and governmental uses.
	Rural Mountainous (RM)	10 ac min.	- Single-family residential uses with a minimum lot size of 10 acres. - Areas of at least 10 acres where a minimum of 70% of the area has slopes of 25% or greater. - Allows limited animal keeping, agriculture, recreational uses, compatible resource development (which may include the commercial extraction of mineral resources with approval of a SMP) and associated uses and governmental uses.
	Rural Desert (RD)	10 ac min.	- Single-family residential uses with a minimum lot size of 10 acres. - Allows limited animal keeping, agriculture, recreational, renewable energy uses including solar, geothermal and wind energy uses, as well as associated uses required to develop and operate these renewable energy sources, compatible resource development (which may include the commercial extraction of mineral resources with approval of SMP), and governmental and utility uses.
Rural Community	Estate Density Residential (RC-EDR)	2 ac min.	- Single-family detached residences on large parcels of 2 to 5 acres. - Limited agriculture, intensive equestrian and animal keeping uses are expected and encouraged.
	Very Low Density Residential (RC-VLDR)	1 ac min.	- Single-family detached residences on large parcels of 1 to 2 acres. - Limited agriculture, intensive equestrian and animal keeping uses are expected and encouraged.
	Low Density Residential (RC-LDR)	0.5 ac min.	- Single-family detached residences on large parcels of 0.5 to 1 acre. - Limited agriculture, intensive equestrian and animal keeping uses are expected and encouraged.
Open Space	Conservation (C)	N/A	The protection of open space for natural hazard protection, cultural preservation, and natural and scenic resource preservation. Existing agriculture is permitted.
	Conservation Habitat (CH)	N/A	Applies to public and private lands conserved and managed in accordance with adopted Multiple Species Habitat and other Conservation Plans.
	Water (W)	N/A	- Includes bodies of water and natural or artificial drainage corridors. - Extraction of mineral resources subject to SMP may be permissible provided that flooding hazards are addressed and long term habitat and riparian values are maintained.
	Recreation (R)	N/A	- Recreational uses including parks, trails, athletic fields, and golf courses. - Neighborhood parks are permitted within residential land uses.
	Rural (RUR)	20 ac min.	- One single-family residence allowed per 20 acres. - Extraction of mineral resources subject to SMP may be permissible provided that scenic resources and views are protected.
	Mineral Resources (Min)	N/A	- Mineral extraction and processing facilities. - Areas held in reserve for future mineral extraction and processing.

Issues of concern.

1. Findings for Foundation Component General Plan Amendment cannot be made.
2. (Ord. 348 § 2.5 (B).) Pursuant to Ordinance 348 Section 2.5 (F), a regular Foundation Component Amendment must include findings, based on substantial evidence:
 - (a) That new conditions or circumstances disclosed during the review process justify modifying the General Plan;
 - (b) That the modifications do not conflict with the overall Riverside County Vision, and
 - (c) That they would not create an internal inconsistency among the elements of the General Plan.
3. **General Plan Amendments proposing a change of land use designation from one Foundation Component to another will only be entertained by the County of Riverside at eight-year intervals. Next eight-year interval Foundation General Plan Amendment initiation is scheduled to take place 2024.**
4. Violations of the General Plan and Woodcrest Area plan Vision.
5. Violations of the General Plan and Ordinance 348 Section 2.5.
6. Surrounding rural roads are not equipped for thousands of vehicles.
7. The area has some of the worst smog in the nation.
8. Traffic impacts.
9. Health Impacts.

• Aesthetics • Agriculture & Forest Resources • Air Quality • Biological Resources • Cultural Resources • Energy • Geology / Soils • Greenhouse Gas Emissions • Hazards & Hazardous Materials • Hydrology/ Water Quality • Land Use / Planning	- Mineral Resources - Noise - Paleontological Resources - Population / Housing - Public Services - Recreation - Transportation - Tribal Cultural Resources - Utilities / Service Systems - Wildfire - Mandatory Findings of Significance
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The Project includes an arroyo with a blue line stream flowing through it. This must be protected.



The last initiation of the Foundation General Plan Amendment was 2016. The next year that the Foundation General Plan Amendments is set for initiation is 2024.

See 2016 FGPA Process attached.

See ordinance 348 Foundation GPA. 2.5

FINDINGS FOR FOUNDATION COMPONENT GENERAL PLAN AMENDMENT CANNOT BE MADE

FGPA for this Project cannot be initiated as the required findings for approving such an amendment are unsupported by substantial evidence and cannot be made. This Project is subject to a Foundation General Plan Amendment with an eight-year approval cycle. (Ord. 348 § 2.5 (B).) Pursuant to Ordinance 348 Section 2.5 (F), a regular Foundation Component Amendment must include findings, based on substantial evidence:

- (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.

1b. There are no new conditions or circumstances that justify a Foundation General Plan Amendment.

2b. Modifications would conflict with the Riverside County Vision and Lake Mathews/Woodcrest Area Plan.

3b. This Project would create an internal inconsistency among the elements of the General Plan by changing rural residential zoning to allow high density housing outside of the established rural community.

General Plan Administrative Element. A-12

3. Foundation Amendment Findings. The premise for a Foundation Amendment is that the General Plan will only be amended in any fundamental way for significant cause. The intent with Foundation Amendment Findings is to consider them comprehensively in the context of the entire General Plan and their overall impacts on the Riverside County Vision and its implementation. A Foundation Amendment may occur in two ways. The first would be as part of a regular General Plan Review cycle. The first finding is required for this type of amendment. The second means of making a Foundation Amendment would be as a result of extraordinary events. The first two and any one or more of the subsequent findings will be necessary to justify an Extraordinary Amendment, which does not have to comply with the General Plan Review cycle:

a. The foundation change is based on substantial evidence that new conditions or circumstances disclosed during the review process justify modifying the General Plan, that the modifications do not conflict with the overall Riverside County Vision, and that they would not create an internal inconsistency among the elements of the General Plan.

b. A condition exists or an event has occurred that is unusually compelling and can only be rectified by making changes in the current Riverside County Vision, Principles, or Policies. An Extraordinary Amendment must still result in a consistent direction for the subsequent planning period. The condition stimulating such an amendment may involve private properties, public properties or both.

GP Page 10 Vision

Clarity in Land Use Guidance

Completely Mapped Policy: Land use mapping at the General Plan level (see Chapter 3, Land Use Element) depicts four “Foundation” Components, while Area Plans use a streamlined, consistent set of land use designations that fall under the umbrella of the Foundation Components.

The Foundation Components: The RCIP Vision calls for the land uses in Riverside County to be clearly mapped, and areas suitable for development or agriculture to be easily distinguishable from those to be permanently conserved, either for habitat or to accommodate natural resources or open space. As a result, the land use designations used in this General Plan fall under the umbrella of five Foundation Components, or major categories of Riverside County land use: **Community Development, Rural, Rural Community, Agriculture, and Multipurpose Open Space**. The countywide map of land use delineates only those five Foundation Components (see Chapter 3, Land Use Element).

As detailed in the description of the General Plan Certainty System (see general description below and Chapter 11, Administration), the significance of these foundation components is that **General Plan Amendments proposing a change of land use designation from one Foundation Component to another will only be entertained by the County of Riverside at eight-year intervals.**

Preserving Stability and Flexibility in the Plan Over Time: The Certainty System

The Riverside County General Plan Certainty System provides clarity regarding the interpretation and use of the General Plan in ongoing decision making, and seeks to sustain the Plan's policy direction over time (see Chapter 10, Administration). It recognizes that circumstances will change, imperfections in the Plan will be discovered, and events will occur that require changes in the Plan. The overriding consideration, however, is the absolute necessity to maintain a high level of confidence in the Plan and enable people affected by it to have reasonable expectations regarding how the Plan will impact them. **The Certainty System serves the needs of those who value a rural lifestyle**, farmers who have invested in their operations, and developers who want to ensure return on their investments. The System also ensures that open space is preserved in Riverside County for the benefit of all.

Administrative Element General Plan.

Healthy Communities General Plan element

Open Space, Rural, Rural Community and Agriculture Land Uses

These policies are intended for Open Space, Rural, Rural Community, and Agriculture areas, which were designated in this General Plan to preserve the rural lifestyle that is an integral part of the character and appeal of Riverside County. Agriculture defines the unique character of many communities in Riverside County, and helps to define the edges of and provide separation between developed areas. Widespread and diverse agricultural lands are one of Riverside County's most important land uses in terms of historic character, economic strength and human health.

When local agricultural products are grown and distributed locally, people have better access to high quality, nutritious food. In addition, local food sources are closer to local retailers and thus require less in terms of transportation costs and fossil fuel. The goal of this section is to promote development patterns in Rural and Agricultural areas that are consistent with the General Plan Vision and which promote healthy lifestyles.

Policies:

HC 4.1 Promote healthy land use patterns by doing each of the following to the extent feasible: (AI 137)

- a. Preserving rural open space areas, and scenic resources.
- b. Preventing inappropriate development in areas that are environmentally sensitive or subject to severe natural hazards.
- c. Developing incentives, such as transfer of development rights, clustered development, development easements, and other mechanisms, to preserve the economic value of agricultural and open space lands.

Environmental Health

People today are exposed to an unprecedented amount of harmful substances ranging from particulate matter and emissions from auto and industrial sources to toxic pesticides and ingredients found in every day household and pharmaceutical products. These harmful substances enter into our air and water supplies and accumulate in our bodies causing a range of health effects such as increased respiratory illnesses, cancer and other chronic health

problems. Consequently, decisions about the location and mix of land uses, transportation investments, design and building practices and building materials can all have an impact on the environment and human health.

Motor vehicles are the principal source of particulate matter and other pollutants that contribute to poor air quality and associated respiratory illnesses. In general, the more vehicle miles traveled in a region, the worse the air pollution. Factories, concentrated in heavily industrial areas, are equally problematic.

The County must follow the law. This Project requires following CEQA, the General Plan, the Lake Mathews/ Woodcrest Area Plan, State laws, habitat laws and regulations.

This Project cannot complete the required Foundation General Plan Amendment.

Sincerely,

A handwritten signature in cursive script, reading "Debbie Walsh".

Debbie Walsh
Rural Association of Mead Valley



Hans W. Kernkamp, General Manager-Chief Engineer

SENT VIA EMAIL ONLY

kmason@rivco.org

March 14, 2023

Krista Mason, Urban Regional Planner IV
Riverside County Planning Department (County)
4080 Lemon St.
P.O. Box 1409
Riverside, CA 92502

RE: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for Arroyo Vista (GPA220009, CZ2200031, and TTM38510)

Dear Ms. Mason:

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOP addressing a DEIR for the proposed Arroyo Vista Project (Project). The Project includes various applications to allow for the development of 232 single-family residential lots. The RCDWR offers the following comments for your consideration while preparing the Project's DEIR.

1. Construction of the Project may generate a substantial quantity of construction and demolition (C&D) waste. Should a large quantity of C&D waste, that is unable to be recycled, be brought to a County landfill for disposal, it could exceed the landfill's daily permitted capacity, thus a violation of state regulations.¹ To assess waste impacts, the DEIR should consider quantitatively analyzing this potential solid waste impact and discuss feasible mitigation programs/regulatory compliance.

Note: CalRecycle's website may be helpful to determine the Project's waste generation:

<https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>

2. The following information can be useful in the analysis of the solid waste impacts:
 - a) Solid waste generated within the Project area is collected by WMI, with the bulk of recyclable waste and green waste delivered to the Moreno Valley Solid Waste Recycling and Transfer Station (MVRTS) 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.
 - b) The waste hauler may utilize the El Sobrante, Lamb Canyon, and/or the Badlands Landfill for disposal. Descriptions of the local landfills are provided below:

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

¹ Title 40, Vol. 41 C.F.R § 243.203 *et seq.* (1976).

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 2021 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 50.1 million tons.² In 2022, the El Sobrante Landfill accepted a daily average of 10,646 tons with a period total of approximately 3,278,846 tons. The landfill is expected to reach capacity in approximately 2057.

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.³ As of January 1, 2023 (beginning of day), the landfill has a total remaining capacity of approximately 7.3 million tons.³ The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032.⁴ From January 2022 to December 2022, the Lamb Canyon Landfill accepted a daily average of 1,969 tons with a period total of approximately 606,481 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site.

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 permitted disturbance area of 278 acres, of which 150 acres are permitted for refuse disposal. The landfill is currently permitted to receive 4,500 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 21.4 million tons.⁶ As of January 1, 2023 (beginning of day), the landfill had a total remaining disposal capacity of approximately 3.5 million tons.⁷ The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2026.⁸ From January 2022 to December 2022, the Badlands Landfill accepted a daily average of 2,660 tons with a

² 2021 El Sobrante Landfill Annual Report- Based on 125,193,774 tons remaining capacity (40% for in-county waste).

³ GASB 18_2022 – Engineering Estimate for total landfill capacity

³ GASB 18_2022 & SiteInfo

⁴ SWFP # 33-AA-0007

⁶ GASB_18_2022 – Engineering Estimate for total landfill capacity

⁷ GASB_18_2022 & SiteInfo

⁸ SWFP # 33-AA-0006

period total of approximately 819,166 tons. Landfill expansion potential exists at the Badlands Landfill site.

3. Additionally, the following measures may help to reduce the Project's anticipated solid waste impacts and enhance efforts to comply with the State's mandate (AB 75) of 50% solid waste diversion from landfilling⁹:

- The use of mulch and/or compost in the development and maintenance of landscaped areas within the project boundaries is recommended. Recycle green waste through either onsite composting of grass, i.e., leaving the grass clippings on the lawn, or sending separated green waste to a composting facility.
- Consider xeriscaping and the use of drought tolerant low maintenance vegetation in all landscaped areas of the project.
- Hazardous materials are not accepted at the Riverside County landfills. Any hazardous wastes, including paint, used during construction must be properly disposed of at a licensed facility in accordance with local, state and federal regulations. For further information regarding the determination, transport, and disposal of hazardous waste, please contact the Riverside County Department of Health, Environmental Protection and Oversight Division, at 1.888.722.4234.
- To address solid waste impacts and help the County comply with AB 939 (Integrated Waste Management Act) and the California Green Building Standards, through diverting solid waste from landfill disposal, a Waste Recycling Plan (WRP) shall be submitted to the Riverside County Department of Waste Resources for review and approval prior to construction. At a minimum, the WRP must identify the materials (i.e., 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 materials, 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 (2) 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. After the project is completed, a Waste Reporting Form and evidence (i.e., receipts or other types of verification) shall be submitted demonstrating project compliance with the approved WRP.
- Demonstrate compliance with SB 1383 which establishes regulations to reduce organics waste disposal and went into effect on January 1, 2022.⁵ This law establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants caused by organics waste disposal.

⁹ A.B. 75, Chapter 764, 1999-2000 Strom-Martin, (Cal. 1999).

⁵ S.B 1383, Chapter 395, 2015-2016 Lara, (Cal. 2016).

Krista Mason, Urban Regional Planner IV
Riverside County Planning Department (County)
NOP DEIR – Arroyo Vista Project
March 14, 2023
Page 4

Thank you for allowing us the opportunity to comment on the NOP. Please continue to provide us with Project updates and any CEQA documentation, as the Project progresses. Please email me at Kaavila@rivco.org if you have any questions regarding the above comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ka', followed by a horizontal line.

Katherine Avila
Urban/Regional Planner I

Cc: Kinika Hesterly, RCDWR

DM# 311521