


# Draft Environmental Impact Report

***SCH No. 2021080570***

# Keller Crossing Specific Plan No. 380, Amendment No. 1

## Riverside County, California

**Lead Agency:**

**Riverside County**
**Planning Department**
**4080 Lemon Street, 12th Floor**
**Riverside, CA 92501**

**Draft Environmental Impact Report | July 31, 2026**

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**Lead Agency**
Riverside County
Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501

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**Lead Agency Discretionary Permits**
Specific Plan Amendment (SP00380A01)
General Plan Amendment (GPA 210004)
Change of Zone (CZ 2100012)
Tentative Tract Map (TTM 38163)


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# Acronyms and Abbreviations

| Acronym | Definition |
|---|---|
| § | Section |
| °F | Fahrenheit |
| µg/$m^3$ | Micrograms per Cubic Meter |
| | |
| A-D | "Agriculture-Dairy" Riverside County zoning designation |
| A-P Act | Alquist-Priolo Earthquake Fault Zoning Act |
| AB | Assembly Bill |
| AB 16 | Assembly Bill 16 |
| AB 32 | California Global Warming Solutions Act of (2006) |
| AB 52 | Native Americans: California Environmental Quality Act |
| AB 341 | Mandatory Commercial Recycling Program |
| AB 939 | California Solid Waste Integrated Waste Management Act |
| AB 1327 | Waste Reuse and Recycling Act |
| AB 1358 | Complete Streets Act |
| AB 1493 | Pavely Fuel Efficiency Standards |
| AB 2185 | Assembly Bill 2185 |
| AB 3030 | Assembly Bill 3030 |
| ABAU | Adjusted Business As Usual |
| ACM | Alternative Calculation Method |
| ACOE | Army Corps of Engineers |
| ACS | American Community Survey |
| ADOE | Archaeological Determinations of Eligibility |
| ADT | Average Daily Traffic |
| ADT | Average Daily Trips |
| af | Acre-feet |
| af/yr | Acre Feet per Year |
| AG | Agriculture |
| AIA | Airport Influence Area |
| AICP | American Institute of Certified Planners |
| AIRFA | American Indian Religious Freedom Act |
| ALUC | Airport Land Use Commission |
| ALUCP | Airport Land Use Compatibility Plan |
| AMSL | Above Mean Sea Level |
| APS | Alternative Planning Strategy |
| APN | Assessor Parcel Number |
| AQA | Air Quality & Greenhouse Gas Assessment |
| AQIA | Air Quality Impact Analysis |

# Acronyms and Abbreviations

| Acronym | Definition |
|---|---|
| AQMP | Air Quality Management Plan |
| ARB | Air Resources Board |
| ASTM | American Society of Testing and Materials |
| BAAQMD | Bay Area Air Quality Management District |
| BACM | Best Available Control Measure |
| BMPs | Best Management Practices |
| BERD | Built Environment Resources Directory |
| BLM | Bureau of Land Management |
| BP | Before Present |
| BSC | Building Standards Code |
| BTU | British Thermal Unit |
| CA MUTCD | California Manual on Uniform Traffic Control Devices |
| CAA | Federal Clean Air Act |
| CAAQS | California Ambient Air Quality Standards |
| CAB | California Architects Board |
| CAL FIRE | California Department of Forestry and Fire Protection |
| CalEEMod™ | California Emissions Estimator Model |
| CalEPA | California Environmental Protection Agency |
| CalEnviroScreen | California Communities Environmental Health Screening Tool Version 3.0 |
| CALGAPS | California LBNL GHG Analysis of Policies Spreadsheet |
| CALGreen | California Green Building Standards Code |
| CalSTA | California State Transportation Agency |
| Caltrans | California Department of Transportation |
| CAP | Climate Action Plan |
| CAPCOA | California Air Pollution Control Officers Association |
| CARB | California Air Resources Board |
| CASSA | Criteria Area Species Survey Area |
| CBSC | California Building Standards Code |
| CBSC | California Building Standards Commission |
| CC | Community Center |
| CCR | California Code of Regulations |
| CCAA | California Clear Air Act |
| C&D | Construction and Demolition |
| CDC | California Department of Conservation |
| CDE | California Department of Education |

# Acronyms and Abbreviations

| Acronym | Definition |
|---|---|
| CDFW | California Department of Fish and Wildlife |
| CDPR | California Department of Pesticide Regulation |
| CEC | California Energy Commission |
| CEQA | California Environmental Quality Act |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CETAP | Community Environmental Transportation Acceptability Process |
| CFCs | Chlorofluorocarbons |
| CFR | Code of Federal Regulations |
| CFS | Cubic Feet per Second |
| CGC | California Government Code |
| $CH_4$ | Methane |
| CDFW | California Department of Fish and Wildlife |
| CHL | California Historic Landmarks |
| CIWMB | California Integrated Waste Management Board |
| CIWMP | Riverside Countywide Integrated Waste Management Plan |
| CLCA | California Land Conservation Act |
| CMP | Congestion Management Program |
| CMUTD | California Manual on Uniform Traffic Control Devices |
| CNEL | Community Noise Equivalent Level |
| CO | Carbon Monoxide |
| COA | Conditions of Approval |
| COG | Council of Governments |
| $CO_2$ | Carbon Dioxide |
| $CO_2e$ | Carbon Dioxide Equivalent |
| COP | Conference of the Parties |
| COP | Community Oriented Policing |
| COPPS | Community Oriented and Policing Problem Solving |
| CPEP | Clean Power and Electrification Pathway |
| CPHI | California Points of Historical Interest |
| CPUC | California Public Utilities Commission |
| CR | Commercial Retail |
| CRA | Cultural Resources Assessment |
| CRA | Colorado River Aqueduct |
| CRHR | California Register of Historic Places |
| CSA | Community Service Area |
| CTC | California Transportation Commission |
| CTR | California Toxic Rule |

# Acronyms and Abbreviations

| Acronym | Definition |
|---|---|
| CUP | Conditional Use Permit |
| CWA | Clean Water Act |
| CWC | California Water Code |
| c.y. | cubic yards |
| CZ | Change of Zone |
| CZ 2100012 | Change of Zone 2100012 |
| | |
| dB | Decibel |
| dBA | A-weighted Decibels |
| DBESP | Determination of Biological Equivalent or Superior Preservation |
| DBF | deposit-based fee |
| DC/TP | discovery clause/treatment plan |
| DEH | Department of Environmental Health |
| DIF | Development Impact Fee |
| DMA | Drainage Management Areas |
| DMV | Department of Motor Vehicles |
| DOE | Determination of Eligibility |
| DOF | California Department of Finance |
| DOSH | Division of Occupational Safety and Health |
| DPM | Diesel Particulate Matter |
| DTSC | Department of Toxic Substances Control |
| du/ac | Dwelling Units per Acre |
| DWR | Riverside County Department of Waste Resources |
| DWR | Riverside County Department of Water Resources |
| | |
| EA | Environmental Assessment |
| EAP | Existing Plus Ambient Plus Project |
| EAP | Elsinore Area Plan |
| EAPC | Existing Plus Ambient Plus Cumulative Plus Project |
| e.g. | for example |
| EDR | Environmental Data Resources, Inc. |
| EIC | Eastern Information Center |
| EIR | Environmental Impact Report |
| EIS | Environmental Impact Statement |
| EMFAC | EMission FACtor model |
| EMWD | Eastern Municipal Water District |
| EO | Executive Order |

# Acronyms and Abbreviations

| Acronym | Definition |
|---|---|
| EPA | Environmental Protection Agency |
| EPCRA | Emergency Planning and Community Right-To-Know Act |
| EPS | Emission Performance Standard |
| ESA | Environmental Site Assessment |
| ETW | Equivalent Test Weight |
| EV | Electric Vehicle |
| FAA | Federal Aviation Administration |
| FAR | floor area ratio |
| FEMA | Federal Emergency Management Agency |
| FERC | Federal Energy Regulatory Commission |
| FHWA | Federal Highway Administration |
| FIMA | Federal Insurance and Mitigation Administration |
| FIRM | Flood Insurance Rate Map |
| FMMP | Farmland Mapping and Monitoring Program |
| FMZ | Fuel Modification Zone |
| FPP | Fire Protection Plan |
| FPEIR | Final Program Environmental Impact Report |
| FRAP | Resource Assessment Program |
| FTA | Federal Transit Administration |
| FYI | for your information |
| GBN | Ground-Based Noise |
| GBV | Ground-Based Vibration |
| GHG | Greenhouse Gas |
| GLO | General Land Office |
| GMP | Groundwater Basin |
| GMZ | Groundwater Management Zone |
| GOBiz | Governor's Office of Business and Economic Development |
| gpd | Gallons per Day |
| GPA | General Plan Amendment |
| GPA 200004 | General Plan Amendment No. 21004 |
| GPCD | Gallons per Capita per Day |
| GSA | Groundwater Sustainability Agencies |
| GSP | Groundwater Sustainability Plans |
| GVWR | Gross Vehicle Weight Rating |
| GWH | Gigawatt Hours |

# Acronyms and Abbreviations

| Acronym | Definition |
|---|---|
| Ha | High Sensitivity A |
| Hb | High Sensitivity B |
| HAPs | Hazardous Air Pollutants |
| HBW | Home Based Work |
| HCM | Highway Capacity Manual |
| HCP | Habitat Conservation Plan |
| HD | heavy-duty |
| HHD | Heavy-Heavy Duty Trucks |
| HI | Hazard Index |
| HMBEP | Hazardous Materials Business Emergency Plan |
| HMTA | Hazardous Materials Transportation Act |
| HMTAUSA | Hazardous Materials Transportation Uniform Safety Act |
| HOV | High-Occupancy Vehicle |
| HPDF | Historic Property Data File |
| HPS | High Pressure Sodium |
| HRA | Health Risk Assessment |
| HSC | Health and Safety Code |
| HSWA | Federal Hazardous and Solid Waste Amendments |
| HUD | Department of Housing and Urban Development |
| HWCL | Hazardous Waste Control Law |
| I | Interstate |
| I-215 | Interstate 215 |
| I-15 | Interstate 15 |
| i.e. | that is |
| IA | Implementing Agreement |
| ICAO | International Civil Aviation Organization |
| IEPR | Integrative Energy Policy Report |
| In/sec | Inches Per Second |
| IRP | Integrated Resource Planning |
| ISO | Independent Service Operator |
| ISTEA | Intermodal Surface Transportation Efficiency Act of 1991 |
| ITE | Institute of Transportation Engineers |
| ITIP | Interregional Transportation Improvement Plan |
| IWMA | Integrated Waste Management Act |
| IWMP | Integrated Waste Management Plan |

# Acronyms and Abbreviations

| Acronym | Definition |
|---|---|
| JPA | Joint Powers Authority |
| LACM | Museum of Los Angeles County |
| LBNL | Lawrence Berkeley National Laboratory |
| LDA | light-duty auto |
| LCFS | low carbon fuel standard |
| LEA | Lead Enforcement Agency |
| Leq | equivalent continuous sound level |
| Lmax | maximum noise level |
| LOS | Level of Service |
| LRA | Local Responsibility Areas |
| LSEs | Load-Serving Entities |
| LSTs | Localized Significance Thresholds |
| LTF | Local Transportation Fund |
| LTOs | Licensed Timber Operators |
| LUST | Leaking Underground Storage Tank |
| MARB | March Air Reserve Base |
| MCY | Motorcycles |
| MCP | Mid-County Parkway |
| MD | medium-duty |
| MDP | Master Drainage Plan |
| MDR | “Medium Density Residential” SP380 land use designation |
| MDV | Medium-Duty Trucks |
| MGD | million gallons per day |
| MHDR | “Medium High Density Residential” SP 380 land use designation |
| MHDT | Medium-Heavy Duty Trucks |
| MICR | Maximum Individual Cancer Risk |
| MLD | Most Likely Descendent |
| MMTs | million metric tons |
| $MMTCO_2e$ | million metric tons of carbon dioxide equivalent |
| $MMTCO_2e/yr$ | million metric tons of carbon dioxide equivalent per year |
| Mph | Miles Per Hour |
| MPO | Metropolitan Planning Organization |
| MRZ-3 | Mineral Resource Zone 3 |
| MS4 | Municipal Separate Storm Sewer System |

# ACRONYMS AND ABBREVIATIONS

| ACRONYM | DEFINITION |
|---|---|
| MSHCP | Multiple Species Habitat Conservation Plan |
| MSR | million solar roofs |
| MUSD | Menifee Union School District |
| $MTCO_2e$ | Metric Tons of Carbon Dioxide Equivalent |
| MWD | Metropolitan Water District |
| | |
| NAHC | Native American Heritage Commission |
| NAGPRA | National American Graves Protection and Reparation Act |
| NAAQS | National Ambient Air Quality Standards |
| NDA | No Development Alternative |
| NDC | nationally determined contributions |
| NEPSSA | Narrow Endemic Plant Species Survey Area |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NFIP | National Flood Insurance Program |
| NHLs | National Historic Landmarks |
| NHPA | National Historic Preservation Act |
| NIOSH | National Institute for Occupational Safety and Health |
| $NO_2$ | Nitrogen Dioxide |
| $NO_X$ | Nitrogen Oxides |
| $N_2O$ | Nitrous Oxide |
| NOAA | National Oceanic and Atmospheric Administration |
| NOP | Notice of Preparation |
| NPA | No Project Alternative |
| NPDES | National Pollutant Discharge Elimination System |
| NPRM | Notice of Proposed Rule Making |
| NPS | National Park Service |
| NPS | non-point source |
| NRHP | National Register of Historic Places |
| NTR | National Toxic Rule |
| NVIA | Noise and Vibration Impact Assessment |
| | |
| $O_3$ | Ozone |
| OAG | Office of Attorney General |
| OAL | Office of Administrative Law |
| OBUS | Other Buses |
| OEHHA | Office of Environmental Health Hazard Assessment |
| Off-Site CRA | Off-site impact areas |

# Acronyms and Abbreviations

| Acronym | Definition |
|---|---|
| OHP | Office of Historic Preservation |
| OIH | Office of Industrial Hygiene |
| OPR | Office of Planning and Research |
| OS-CH | "Open Space – Conservation Habitat" SP-380 land use designation |
| OS-MS | "Open Space – Manufactured Slopes" SP-380 land use designation |
| OS-R | "Open-Space Recreation" SP 380 land use designation |
| OS-W | "Open-Space Water" SP 380 land use designation |
| OSHA | Occupational Safety and Health Assessment |
| PA | Public Address |
| PCBs | Polychlorinated biphenyls |
| PCEs | Passenger Car Equivalents |
| PeMS | Caltrans' Performance System Website |
| PG&E | Pacific Gas and Electric |
| PHF | peak hour factor |
| p.m. | Post Meridiem (between the hours of noon and midnight) |
| PM | Particulate Matter |
| $PM_{2.5}$ | Fine Particulate Matter (2.5 microns or smaller) |
| $PM_{10}$ | Fine Particulate Matter (10 microns or smaller) |
| POUs | Publicly-Owned Electric Utilities |
| ppm | parts per million |
| PPV | peak particle velocity |
| PRC | Public Resources Code |
| PRIMP | Paleontological Resources Impact Mitigation Program |
| PRPA | Paleontological Resources Preservation Act |
| PUC | Public Utilities Code |
| PUHSD | Perris Union High School District |
| PVRWRF | Perris Valley Regional Water Reclamation Facility |
| PWQMP | Preliminary Water Quality Management Plan |
| Qvof | Quaternary Very Old Fan Deposits |
| R-A-5 | Residential Agricultural, 5-acre Minimum Lot Size |
| R-R | "Rural Residential" Riverside County Zoning Designation |
| RC-LDR | Rural Community – Low Density Residential |
| RCA | Western Riverside County Regional Conservation Authority |
| RCALUC | Riverside County Airport Land Use Commission |

# Acronyms and Abbreviations

| Acronym | Definition |
|---|---|
| RCCDR | Riverside County Center for Demographic Research |
| RCDWR | Riverside County Department of Waste Resources |
| RCFCWCD | Riverside County Flood Control and Water Conservation District |
| RCFD | Riverside County Fire Department |
| RCHCA | Riverside County Habitat Conservation Agency |
| RCSD | Riverside County Sheriff's Department |
| RCIT | Riverside County Information Technology |
| RCP | Reinforced concrete pipe |
| RCPG | Regional Comprehensive Plan and Guide |
| RCPLS | Riverside County Public Library System |
| RCRA | Resource Conservation and Recovery Act |
| RCTC | Riverside County Transportation Commission |
| RCWD | Rancho California Water District |
| REC | Recognized environmental Concerns |
| REL | Reference Exposure Level |
| RHNA | Regional Housing Needs Assessment |
| RivTAM | Riverside Transportation Analysis Model |
| RMM | Riverside Municipal Museum |
| RMS | root mean square |
| ROGs | Reactive Organic Gasses |
| ROW | Right-of-Way |
| RPFs | Registered Professional Foresters |
| RPS | Renewable Portfolio Standards |
| RSHA | Regional System of Highways and Arterials |
| RTA | Riverside Transit Agency |
| RTIP | Regional Transportation Improvement Plan |
| RTP | Regional Transportation Plan |
| RTPA | Regional Transportation Planning Agency |
| RTP/SCS | Regional Transportation Plan/Sustainable Communities Strategy |
| RWQCB | Regional Water Quality Control Board |
| RWRF | Regional Water Reclamation Facility |
| | |
| SF/s.f. | square foot or square feet |
| SARA | Superfund Amendments and Reauthorization Act |
| SB | Senate Bill |
| SB 18 | Senate Bill 18 |
| SB 1 | Road Repair and Accountability Act of 2017 |

# Acronyms and Abbreviations

| Acronym | Definition |
|---|---|
| SB 32 | Statewide for California to reduce GHG emissions |
| SB 50 | Senate Bill 50 |
| SB 221 | Senate Bill 221 |
| SB 325 | Transportation Development Act (Mills-Alquist-Deddeh Act) |
| SB 375 | Senate Bill 375 |
| SB 350 | Clean Energy and Pollution Reduction Act of 2015 |
| SB 610 | Senate Bill 610 |
| SB 743 | Senate Bill 743, Transportation Impacts |
| SB 1000 | Senate Bill 1000 |
| SB 1368 | CPUC adopt a GHG emission performance standard |
| SB 1078 | California Renewables Portfolio Standard Program |
| SBCM | San Bernardino County Museum |
| SCAB | South Coast Air Basin |
| SCAG | Sothern California Association of Governments |
| SCAQMD | Southern Coast Air Quality Management District |
| SCE | Southern California Edison |
| SCH | California State Clearinghouse (Office of Planning and Research) |
| SCS | Sustainable Communities Strategy |
| SDG&E | San Diego Gas and Electric |
| SDNHM | San Diego Natural History Museum |
| SDWA | Safe Drinking Water Act |
| SED | Socio-Economic Data |
| SFP | School Facilities Program |
| SGC | Strategic Growth Council |
| SGMA | Sustainable groundwater management act |
| SHMA | Seismic Hazards Mapping Act |
| SHPO | State Historic Preservation Officers |
| SHRC | State Historical Resources Commission |
| SHS | State Highway System |
| SHWS | State Hazardous Waste Sites |
| SIPs | State Implementation Plans |
| SJVAPCD | San Joaquin Valley Air Pollution Control District |
| SKR HCP | Stephens' Kangaroo Rat Habitat Conservation Plan |
| SLPS | short-lived climate pollutant strategy |
| SMARA | Surface Mining and Reclamation Act of 1975 |
| SNUR | Significant New Use Rule |
| SoCalGas | Southern California Gas |

# Acronyms and Abbreviations

| Acronym | Definition |
|---|---|
| SOC | Statement of Overriding Conditions |
| $SO_2$ | Sulfur Dioxide |
| $SO_X$ | Sulfur Oxide |
| SP | Specific Plan |
| SP Zone | Specific Plan Zone |
| SP 380 | Keller Crossing Specific Plan No. 380 |
| SP 380A1 | Keller Crossing Specific Plan No. 380 Amendment No. 1 |
| SR | State Route |
| SR-74 | State Route 74 |
| SR-79 | State Route 79 |
| SRA | Source Receptor Area |
| SRA | State Responsibility Areas |
| SRRE | Source Reduction and Recycling Elements |
| STA | State Transit Assistance |
| STC | Sound Transmission Class |
| STIP | Statewide Transportation Improvement Program |
| SWP | State Water Project |
| SWAP | Southwest Area Plan |
| SWPPP | Storm Water Pollution Prevention Plan |
| SWRCB | State Water Regional Control Board |
| TAC | Toxic Air Contaminants |
| TAZ | traffic analysis zones |
| TCL | Traditional Cultural Landscape |
| TDA | Transportation Development Act |
| TDM | Transportation Demand Management |
| THP | Timber Harvesting Plan |
| TIA | Traffic Impact Analysis |
| TPA | Transit Priority Area |
| TPD | Tons per Day |
| TPY | Tons per Year |
| TTM | Tentative Tract Map |
| TUMF | Transportation Uniform Mitigation Fee |
| UCR | University of California, Riverside |
| UNFCCC | United Nations Framework Convention on Climate Change |
| U.S. | United States |

# Acronyms and Abbreviations

| Acronym | Definition |
|---|---|
| USDA | United States Department of Agriculture |
| USEPA | United States of Environmental Protection Agency |
| USFWS | United States Fish and Wildlife Service |
| USGS | United States Geologic Survey |
| UWMP | Urban Water Management Plan |
| UWMP Act | Urban Water Management Planning Act |
| UWMP-MWD | MWD's 2015 Urban Water Management Plan |
| VHDR | "Very High Density Residential" SP 380 land use designation |
| VHFHSZ | Very High Fire Hazard Severity Zone |
| VMT | Vehicle Miles Traveled |
| VOCs | Volatile Organic Compounds |
| W-1 | Watercourse, Watershed & Conservation Areas |
| W-2 | Controlled Development Areas |
| WDR | Water discharge report/ requirements |
| WMI | Watershed Management Initiative |
| WMIE | Waste Management Inc. of the Inland Empire |
| WQMP | Water Quality Management Plan |
| WRP | Waste Recycling Plan |
| WRRA | Waste Reuse and Recycling Act |
| WRCOG | Western Riverside Council of Governments |
| WSA | Water Supply Assessment |
| WSC | Western Science Center |
| WSCP | Water Shortage Contingency Plan |
| WUI | Wildland-Urban Interface |
| ZE/NZE | zero- and near-zero emission |
| ZORI | Zones of Required Investigation |

# S.0 EXECUTIVE SUMMARY

## S.1 INTRODUCTION

The California Environmental Quality Act (CEQA), Public Resources Code Section 21000, *et seq*. requires that before a public agency makes a decision to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about the project's potential environmental impacts, give the public an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment.

This Draft Environmental Impact Report (EIR), having California State Clearinghouse (SCH) No. 2021080570, was prepared in accordance with CEQA Guidelines Article 9, Sections 15120-15132 to evaluate the potential environmental impacts associated with planning, constructing, and operating the proposed Project, which consists of General Plan Amendment No. 210004 (GPA210004), Amendment No. 1 to Specific Plan No. 380 (SP00380A01), Change of Zone No. 2100012 (CZ2100012), and Tentative Tract Map No. 38163 (TTM38163), which are collectively referred to herein as the "Project" or "proposed Project." This EIR does not recommend approval or denial of the proposed Project; rather, this EIR is a source of factual information regarding potential impacts that the Project may cause to the physical environment. The Draft EIR will be available for public review for a minimum period of 45 days. After consideration of public comment, the County of Riverside will consider certifying the Final EIR and adopting required findings.

This Executive Summary complies with CEQA Guidelines Section 15123, "Summary." This EIR includes a description of the proposed Project and evaluates the physical environmental effects that could result from Project implementation. The County of Riverside determined that the scope of this EIR should cover 21 subject areas. The scope includes all of the subject areas listed in Appendix G to the CEQA Guidelines and in consideration of public comment received by the County in response to this EIR's Notice of Preparation (NOP) and Recirculated NOP, and during publicly-noticed Scoping Sessions, which occurred on September 27th, 2021, and April 21, 2025. The NOP, and written comments received by the County in response to the 2025 NOP, are attached to this EIR as *Technical Appendices A1* and *A2*. In consideration of public comment on the NOP, the 21 environmental subject areas that could be reasonably and significantly affected by planning, constructing, and/or operating the proposed Project are analyzed herein, including:

1. Aesthetics
2. Agriculture and Forestry Resources
3. Air Quality
4. Biological Resources
5. Cultural Resources
6. Energy
7. Geology and Soils
8. Greenhouse Gas Emissions
9. Hazards and Hazardous Materials
10. Hydrology and Water Quality
11. Land Use and Planning
12. Mineral Resources
13. Noise
14. Paleontological Resources
15. Population and Housing
16. Public Services
17. Recreation
18. Transportation
19. Tribal Cultural Resources
20. Utilities and Service Systems
21. Wildfire

Refer to EIR Section 4.0, *Environmental Analysis*, for a full account and analysis of the subject matters listed above. For each of the aforementioned subject areas, this EIR describes: 1) the physical conditions that existed at the approximate time this EIR's recirculated NOP was filed with the California State Clearinghouse (April 3, 2025); 2) discloses the type and magnitude of potential environmental impacts resulting from Project planning, construction, and operation; and 3) if warranted, recommends feasible mitigation measures that would reduce or avoid significant adverse environmental impacts that the proposed Project may cause. A summary of the proposed Project's significant environmental impacts and the mitigation measures imposed by the County of Riverside on the Project to lessen or avoid those impacts is included in this Executive Summary as Table S-1, *Summary of Environmental Impacts, Mitigation Measures, and Conclusions*. The County of Riverside applies mitigation measures that it determines: 1) are feasible and practical for project applicants to implement; 2) are feasible and practical for the County of Riverside to monitor and enforce; 3) are legal for the County to impose; 4) have an essential nexus to the Project's impacts; and 5) would result in a benefit to the physical environment. CEQA does not require the Lead Agency to impose mitigation measures that are duplicative of mandatory regulatory requirements.

This EIR also discusses alternatives to the proposed Project. Alternatives are described that would attain most of the Project's objectives while avoiding or substantially lessening the proposed Project's significant adverse environmental effects. A full discussion of Project alternatives is found in Section 6.0, *Alternatives*.

## S.2 PROJECT SYNOPSIS

### S.2.1 Location and Regional Setting

The approximately 196.1-acre Project site is located within the western portion of unincorporated Riverside County, California. EIR Figure 2-1, *Regional Map*, depicts the Project site's location within the regional vicinity. As shown, Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. The Project site is located within the western region of unincorporated Riverside County, California. As depicted on EIR Figure 2-2, *Vicinity Map*, the Project site is located within the French Valley Community of the Southwest Area Plan (SWAP) of unincorporated Riverside County. More specifically, the approximately 196.1-acre Project site is bound to the south by Keller Road, to the west by the future alignment of Pourroy Road, and to the east by Winchester Road (SR-79). The Project site encompasses Assessor Parcel Numbers (APNs) 472-110-(001, 002, 003, 004, 007, 008, 009, 032, 033, and 034.). The approximately 196.1-acre Project site is located in Section 21, Township 6 South, Range 2 West, San Bernardino Baseline and Meridian. (RCIT, n.d.)

### S.2.2 Project Objectives

The underlying purposes of the proposed Project are to develop a master-planned residential community that provides a range of housing types – including single-family, multi-family, and age-qualified – supported by recreational amenities and a variety of open space areas, including parks, habitat conservation, and water quality features. The Project is intended to comply, to the greatest extent feasible, with applicable

Riverside County standards, codes, and policies. The following is a list of specific objectives that the proposed Project intends to achieve.

A. To efficiently develop an underutilized property with a complementary mix of land uses, including residential, recreational, and open space land uses.

B. To establish a master-planned community in a manner that is sensitive to the environment as well as visually and functionally compatible with surrounding existing and proposed land uses.

C. To develop a master-planned 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 and age-qualified multi-family homes that will be marketable within the evolving economic profile of Riverside County and surrounding communities.

E. 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.

F. To require project design elements such as architecture, landscaping, color, paving, walls, fencing, signage, entry treatments, and other similar design features that would ensure the community is developed in a manner that is aesthetically pleasing.

G. To establish development phasing that results in logical coordinated growth.

### S.2.3 Project Summary Description

The County of Riverside is the Lead Agency for the proposed Project, under whose authority this EIR has been prepared. For purposes of this EIR, the term "Project" refers to the Project's discretionary applications (GPA210004, SP00380A01, CZ2100012, and TM38163) and the discretionary actions required to implement the Project, as proposed, and all of the activities associated with Project implementation including planning, construction, and long-term operations.

Collectively, the approval of these discretionary actions would allow for the development of 694 residential dwelling units on approximately 87.37 acres, the establishment of a public park on 8.88 acres, conservation open space areas on 3.49 acres, the construction of water quality/detention basins on approximately 16.00 acres, the preservation of approximately 61.42 acres of conserved open space for habitat protection, and approximately 18.89 acres of major roadways. Specifically, the Project Applicant is requesting the following governmental approvals from the County of Riverside to implement the Project (refer to Chapter 3.0, *Project Description*, for a complete description of the Project's construction and operational characteristics):

- **General Plan Amendment No. 210004 (GPA210004):** The Project Applicant is requesting approval of a General Plan Amendment to update the land use designations within the Riverside County General Plan and the Southwest Area Plan (SWAP) land use designations to reflect the land uses proposed as part of the Project. Specifically, as part of GPA210004, the approximately 196.1-acre Project site would be redesignated for "Community Development – Medium Density Residential (MDR)" land uses on 16.03 acres, "Community Development – Medium High Density Residential (MHDR)" land uses on 44.63 acres, "Community Development – High Density Residential (HDR)" land uses on 26.71 acres, "Open Space – Recreation (OS-R)" land uses on 8.88 acres, "Open Space – Water (OS-W)" land uses on 16.00 acres, "Open Space – Conservation" land uses on 3.49 acres, "Open Space – Conservation Habitat (OS-CH)" uses on 61.42 acres, along with 18.89 acres of land reserved for circulation infrastructure.

- **Change of Zone No. 2100012 (CZ2100012):** The Riverside County Zoning Ordinance (Ordinance No. 348), which is part of the County's Municipal Code, assigns a zoning classification to all properties in the County boundaries. All development within the County is required, by law, to comply with the provisions of the Zoning Ordinance. Under existing conditions, the Project site is zoned for "Specific Plan Zone (SP Zone)," indicating that zoning for the property is as set forth by the zoning ordinance adopted in conjunction with the original 2013 Keller Crossing Specific Plan No. 380 (SP 380). A Change of Zone (CZ No. 2100012) is proposed as part of the Project, which would amend the Specific Plan Zoning Ordinance to modify and establish the Planning Area boundaries, permitted uses, and development standards throughout the approximately 196.1-acre Project site in order to reflect the land uses proposed as part of Amendment No. 1 to Specific Plan No. 380 (SP 380A1), as described below.

- **Amendment No. 1 to Specific Plan No. 380 (SP00380A01; also referred to herein as "SP 380A1"):** Amendment No. 1 to the Keller Crossing Specific Plan (SP 380A1) is a proposal to modify the configuration, acreages, unit counts, densities, and land use designations of all Planning Areas within the Keller Crossing Specific Plan No. 380. Additionally, SP 380A1 would reduce the overall project acreage by 5.05 acres from 201.1 acres to approximately 196.05 acres as a result of more accurate mapping. Specifically, proposed SPA 380A1 would make the following changes:

    - Eliminate the "Very Low Density Residential (VLDR)" and "Low Density Residential (LDR)"land uses categories previously approved for Planning Areas 1 and 4, respectively;
    - Accommodate five separate residential planning areas of varying density, including one MDR planning area on 16.03 acres (new Planning Area 1), two MHDR planning areas on 44.63 acres (new Planning Areas 2 and 3), and two HDR planning areas on 26.71 acres (new Planning Areas 4 and 5);
    - Increase the number of residential dwelling units allowed within the overall Specific Plan by 374 units, from 320 units to 694 units, thereby allowing for up to 77 MDR dwelling units, 307 MHDR dwelling units, and 310 HDR dwelling units;
    - Eliminate the 37.8 acres and 400,000 s.f. of "Commercial Retail (CR)" land uses previously approved for Planning Areas 2 and 6;

- Establish an 8.88-acre public park (OS-R) in Planning Area 8;
- Establish two (2) OS-C Planning Areas (Planning Aras 6 and 7) on 3.49 acres, portions of which would serve as a land use buffer from existing residential uses to the west;
- Establish three (3) OS-W Planning Areas for drainage and water quality purposes on approximately 16.00 acres within Planning Areas 10, 11, and 12;
- Redesignate and expand the approved Planning Area 7 (referred to as Planning Area 9 under the proposed Project), revise the land use designation of this Planning Area from OS-C to OS-CH, and increase the acreage of planned conserved open space by 0.32-acre, from 61.1 acres to 61.42 acres;
- Decrease areas proposed for backbone circulation from 20.6 acres to 18.89 acres.

The proposed SP 380A1 also would revise the approved development standards, permitted uses, and design guidelines to reflect the revised range of land uses proposed for the site.

- **Tentative Tract Map No. 38163:** Tentative Tract Map No. 38163 (herein, "TTM 38163") is a proposal subdivide the approximately 196.1-acre Project site to implement the land use plan proposed as part of SP 380A1. Specifically, TTM 38163 would subdivide the site into 384 single-family residential lots across proposed Planning Areas 1 through 3, 230 HDR fee simple lots in Planning Area 4, and 80 age-restricted HDR units in Planning Area 5. TTM 38163 also would establish one lot totaling approximately 8.88 acres for a community park; one lot for OS-CH land on approximately 61.42 acres; 5 lots for detention basin/water quality purposes on approximately 13.50 acres; and approximately 20.76 acres of OS-C land and Open Space lots. The remaining acreage would consist of internal and perimeter roadway improvements and associated right-of-way dedications.

## S.3 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

CEQA Guidelines § 15123(b)(2) requires that areas of controversy known to the Lead Agency (Riverside County) be identified in the Executive Summary. Substantive issues raised in response to the 2021 NOP and recirculated 2025 NOP are summarized in Table 1-1 and Table 1-2, respectively, in EIR Section 1.0. The purpose of these tables is to present the primary environmental issues of concern raised by public agencies and the general public during the NOP and recirculated NOP review periods. The table is not intended to list every comment received by the County during the NOP and recirculated NOP review periods. Regardless of whether or not a comment is listed in the table, all applicable comments received in responses to the NOP and recirculated NOP are addressed in this EIR. Based on comments received during the NOP and recirculated NOP review periods, Project impacts to the environment under the issues of aesthetics, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, noise, transportation, tribal cultural resources, and utilities/service systems were identified as potential areas of concern.

## S.4 PROJECT ALTERNATIVES

### S.4.1 No Development Alternative (NDA)

The No Development Alternative (NDA) considers no development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the Project site would continue to consist of approximately 196.1 acres of vacant and undeveloped land, portions of which would continue to be used for dryland farming. Under the NDA, no improvements would be made to the Project site and none of the Project's roadway, utility, or other infrastructure improvements would occur. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the Project site in its existing condition.

### S.4.2 No Project (Adopted Specific Plan) Alternative (NPA)

The No Project (Existing Specific Plan) Alternative (herein, "NPA"), assumes development of the Project site in accordance with the site's existing General Plan and Specific Plan land uses. Figure 2-5 in EIR Subsection 2.0 depicts the site's existing Specific Plan land use designations. Thus, under this alternative, and consistent with the adopted Keller Crossing Specific Plan No. 380 (SP 380), the Project site would be developed with 3 VLDR dwelling units on 9.9 acres; 25 LDR dwelling units on 18.3 acres; 42 MDR dwelling units on 13.9 acres; 39.5 acres of Mixed Use, including 250 dwelling units and 250,000 square feet (s.f.) building area; 400,000 s.f. of CR uses on 37.8 acres; 61.1 acres of OS-C uses; and 20.6 acres of major circulation facilities. 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 SP 380 land use designations.

### S.4.3 Reduced Project Alternative (RPA)

The Reduced Project Alternative (RPA) was selected to evaluate a development scenario that is less intensive than the proposed Project and that could avoid the Project's significant and unavoidable Vehicle Miles Traveled (VMT) impact. Based on the Riverside County 2020 *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled* (herein, "County Guidelines), single-family residential developments with 110 or fewer dwelling units and multi-family residential developments (low rise) with fewer than 147 dwelling units are presumed to have a less-than-significant impact due to VMT, as development of 110 single-family dwelling units or 147 multi-family (low rise) dwelling units would result in the emissions of Greenhouse Gases (GHGs) that would be at or below 3,000 Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$) per year, and such developments are presumed to have a less-than-significant impact due to VMT. Accordingly, the RPA considers development of the Project site with up to 110 single-family dwelling units within the 87.5 acres of the Project site that are proposed for residential uses as part of the proposed Project. Under the RPA, residential dwelling units on site would have an average lot size of approximately 34,638 s.f. (0.8-acre). All other components of the RPA would be similar to the proposed Project, and would include a 9.0-acre park site, 34.9 acres of Open Space – Conservation (OS-C), 61.42 acres of Open Space – Conservation Habitat (OS-CH), 16.1 acres of Open Space – Water (OS-W), and approximately 18.65 acres of public backbone roadways. The purpose of the RPA is to reduce total daily vehicle trips, VMT per capita, and associated air quality and greenhouse gas emissions, while still achieving

at least some of the Project's core objectives. The RPA would retain the overall Specific Plan structure and development pattern of the proposed Project, but at a substantially reduced residential density.

## S.5 EIR PROCESS

As a first step in the CEQA compliance process, Riverside County determined that the proposed Project likely would result in significant environmental effects, and distributed a Notice of Preparation (NOP) for public review on August 31, 2021, held a publicly-noticed scoping meeting on September 27, 2021, and filed the NOP with the State Clearinghouse (SCH). A new SCH number was issued for the Prior Project, SCH No. 2021080570. Following consideration of public comments on the NOP, a Draft EIR was prepared, which was circulated for a 45-day public review period that started on September 22, 2022 and concluded on November 7, 2022.

Prior to completion of the Final EIR for the Prior Project, the Project Applicant determined that the previously-proposed land uses were not feasible to implement based on financial considerations. As a result, the Project Applicant filed revised applications for the proposed SP00380A01, GPA21004, CZ2100012, and TTM38163 (collectively referred to herein as the "Project" or "proposed Project"). The revisions to these applications resulted in the elimination of the previously-proposed 17.7 acres of CR land uses, and the reconfiguration of the site design to accommodate 77 MDR dwelling units on 16.03 acres, 307 MHDR dwelling units on 44.63 acres, 310 HDR dwelling units on 26.71 acres (inclusive of 80 Age-Qualified VHR units on 7.29 acres), an 8.88-acre public park (OS-R), 3.49 acres of manufactured slopes (Open Space-Conservation [OS-C]), 16.00 acres of drainage/water quality features (OS-W), 61.42 acres designated OS-CH for Multiple Species Habitat Conservation Plan (MSHCP) conservation purposes, 18.89 acres of major roadways, and the dedication of 1.29 acres of public rights-of-way for Pourroy Road (0.99-acre) and Winchester Road (0.30-acre). On April 3, 2025, Riverside County recirculated the Project's NOP for a 30-day public review period in order to disclose that the design for the Project site had been changed and to afford the public the opportunity to comment on the potential environmental effects that may result from the newly-proposed land uses. During the 30-day public review period, a publicly-noticed scoping meeting was held at Riverside County Administrative Building on April 21, 2025.

An Initial Study was not prepared for the Project, and thus this EIR evaluates all of the environmental subjects listed in Appendix G to the CEQA Guidelines, as set forth in the County's standard Environmental Assessment Checklist form. This EIR has been prepared as a Project EIR pursuant to CEQA Guidelines § 15161. As described by CEQA Guidelines § 15161, a Project EIR is the most common type of EIR that: 1) examines the environmental impacts of a specific development project; 2) should focus primarily on the changes in the environment that would result from the development of the project; and 3) shall examine all phases of the project, including planning, construction, and operation.

This EIR represents the independent judgment of Riverside County (as the Lead Agency) and evaluates the physical environmental effects that could result from constructing and operating the proposed Project. Acting as Lead Agency, the County of Riverside will consider the following issues regarding the proposed Project: a) evaluation of this EIR to determine if the physical environmental impacts are adequately

disclosed; b) assessment of the adequacy and feasibility of identified mitigation measures and the potential addition, modification to, or deletion of mitigation measures, standard conditions of approval, or Project design features; c) consideration of alternatives to the Project that would reduce or eliminate significant environmental effects of the Project; and, if necessary, d) consideration of Project benefits that override the Project's unavoidable and unmitigable significant effects on the environment. This EIR will be circulated for a 45-day public review period, following which a Final EIR will be prepared that will address comment letters received in response to the Draft EIR and will incorporate any minor amplifications or clarifications to the Draft EIR that may be needed to address such comments.

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

## S.6 SUMMARY OF IMPACTS, MITIGATION MEASURES AND CONCLUSIONS

### S.6.1 Effects Found not to be Significant

An Initial Study was not prepared for the proposed Project, and thus this EIR evaluates all of the environmental subjects listed in Appendix G to the CEQA Guidelines, as set forth in the County's standard Environmental Assessment Checklist form. There were no issues found to be not significant as a result of the Project's NOP process.

### S.6.2 Impacts of the Proposed Project

Table S-1, *Summary of Environmental Impacts*, Mitigation Measures, and Conclusions, provides a summary of the proposed Project's environmental impacts, as required by CEQA Guidelines § 15123(a). Also presented are the mitigation measures recommended by Riverside County to further avoid adverse environmental impacts or to reduce their level of significance. After the application of all feasible mitigation measures, the Project would result in significant and unavoidable environmental effects, as summarized below.

- Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Buildout of the residential uses proposed as part of the Project would result in a VMT per capita of 32.2, which exceeds the County's VMT per capita threshold of significance of 15.2 by approximately 211.8 percent. In addition, the cumulative Project-generated VMT per capita would be approximately 32.2, which would exceed the County's impact threshold of 15.2 by approximately 183.6%. As such, prior to mitigation, the proposed Project would result in a significant direct and cumulatively considerable impact related to VMT. Although the Project includes pedestrian and bicycle

infrastructure such as trails, bike lanes, and sidewalks that support non-vehicular travel and contribute to internal trip reduction, these features are not sufficient to reduce the Project's VMT per capita to a level below the County's significance threshold. Although the Project includes some features, such as the provision of pedestrian and bicycle facilities, designing intersections to accommodate pedestrians and bicycles, and collaboration with the Riverside Transit Authority (RTA) on expanded transit service, the addition of the aforementioned design features likely would result in a modest decrease (under 5%) in VMT and would not reduce Project-generated VMT below the County's impact threshold. Accordingly, because the Project would not meet any of the County Guidelines screening criteria, and because the Production/Attraction (PA) home-based (HB) VMT per capita would exceed the County's VMT impact threshold for both baseline and cumulative conditions, even with the inclusion of feasible design features intended to reduce project-generated VMT, Project impacts due to VMT represent a significant and unavoidable impact for which mitigation is not available.

## Table S-1 Summary of Environmental Impacts, Mitigation Measures, and Conclusions

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
|---|---|---|---|---|
| **4.1 Aesthetics** | | | | |
| **Threshold a.:** The Project site is not located within the viewshed of any officially designated scenic highways, and would not be visually prominent from any State- or County-eligible scenic highways. No impacts would occur to scenic highway corridors. | No Impact | **CRDR 4.1-1** The Project is required to comply with Riverside County Ordinance No. 655, which is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce "skyglow" or light pollution that affects day or nighttime views from the Mount Palomar Observatory (located approximately 22.9 miles southeast of the Project site in northern San Diego County). Pursuant to the requirements of Ordinance No. 655, all lighting shall consist of low-pressure sodium lighting, or other lamp types that emit 4050 lumens or less. If light fixtures are proposed above 4050 lumens, then the lighting shall be fully shielded in conformance with the requirements of Ordinance No. 655. | Project Applicant/ Building and Safety Department | Prior to issuance of building permits |
| **Thresholds b. and c.:** The Project would not substantially damage scenic resources; obstruct any prominent scenic vista or view open to the public; result in the creation of an aesthetically offensive site open to public view; substantially degrade the existing visual quality or character of the site or its surroundings; or conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant. | Less than Significant | | | |
| **Threshold d.:** Project compliance with the provisions of County Ordnance No. 655 would be assured through future County review of building permits. Impacts due to a conflict with Ordinance No. 655 would be less than significant. | Less than Significant | **CRDR 4.1-2** The Project is required to comply with Riverside County Ordinance No. 915, which is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents or degrade their quality of life. | Project Applicant/ Building and Safety Department | Prior to issuance of building permits |
| **Thresholds e. and f.:** Mandatory compliance with the SP 380A1 design guidelines related to lighting, along with compliance with Riverside County Ordinance Nos. 348, 655, and 915, would ensure that Project-related lighting and glare would not adversely affect day or nighttime views in the area, and also would ensure the Project does not | Less than Significant | **CRDR 4.1-3** The Project is required to comply with the Design Guidelines of SP 380A1. Compliance with these Design Guidelines would be assured by the County's future review of implementing building permit applications for compliance with the Specific Plan's design features that would serve to reduce and/or avoid impacts relating to aesthetics. | Project Applicant/ Planning Department | Prior to approval of implementing developments (i.e., plot plans, conditional use permits, etc.) and |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
|---|---|---|---|---|
| expose residential property to unacceptable light levels. Although the Project would incorporate building materials with the potential to create glare, only limited building materials such as glass would have the potential to create glare impacts, and such impacts would be minor and would not adversely affect day or nighttime views in the area. Impacts would be less than significant. | | | | prior to issuance of building permits |
| **4.2 Agriculture and Forestry Resources** | | | | |
| **Threshold a.:** The Project would result in direct and indirect permanent impacts to 163.48 acres of "Farmland of Local Importance," and 32.57 acres of "Other Lands." Accordingly, the Project would not convert any land designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use as defined by the FMMP, and no impact would occur.<br><br>**Threshold b.:** The Project site is not zoned for agricultural production. As such, the Project would not conflict with existing agricultural zoning, and no impact would occur. Under existing conditions, agricultural activities occur across the flatter areas within the southern portions of the Project site. With implementation of the Project, agricultural uses on site would be precluded. Although the Project would conflict with existing agricultural uses on site, the Project site is designated for urban development by the Riverside County General Plan, SWAP, and SP 380. Thus, while the Project would preclude future agricultural uses on site, such conversion was anticipated by the General Plan, SWAP, and SP 380. Accordingly, Project impacts due to the | No Impact<br><br>Less than Significant | **CRDR 4.2-1** The Project is required to comply with Riverside County Ordinance No. 625, which requires that when residential uses are developed adjacent to properties zoned primarily for agricultural purposes (that support agricultural operations that have been in place for at least three years and not considered a nuisance operation at the time the operation began), future homebuyers must be notified of any agricultural operations that are on-going in the area, and mandate that such agricultural uses shall not be the subject of nuisance complaints. | Project Applicant/ Planning Department | Prior to final map recordation |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
|---|---|---|---|---|
| elimination of existing agricultural uses on site would be less than significant. Additionally, the Project site is not subject to a Williamson Act contract and is not located within any County Agricultural Preserves, and there are no components of the proposed Project that have the potential to adversely affect agricultural operations at the nearest agricultural preserve/Williamson Act-contracted lands. As such, Project impacts to agricultural preserves and Williamson Act-contracted lands would be less than significant. | | | | |
| **Threshold c.:** The Project would result in the introduction of non-agricultural uses within 300 feet of agriculturally zoned property. However, the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. Mandatory compliance with Ordinance No. 625 would ensure that Project-related construction and operational activities would not indirectly cause or contribute to the conversion of off-site farmland to non-agricultural use. | Less than Significant | | | |
| **Threshold d.:** The Project would be subject to Riverside County Ordinance No. 625, which would ensure that the urban land uses proposed by the Project would not conflict with existing agricultural operations in the surrounding area, and also would ensure the Project does not result | Less than Significant | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| in the conversion of the surrounding agricultural lands to non-agricultural use. There are no components of the Project that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use. Accordingly, impacts would be less than significant.<br><br>**Thresholds e., f., and g.:** 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)). The Project would not result in the conversion of forest land to non-forest use. No impact would occur. | No Impact | | | |
| **4.3 Air Quality** | | | | |
| **Threshold a.:** The proposed Project would be consistent with the regional growth forecasts used to inform the SCAQMD 2022 AQMP, the Project's long-term operational emissions would not exceed the assumptions made by the SCAQMD the AQMP, and the Project's near-term construction activities would not exceed any of the SCAQMD LSTs. However, the Project's construction-related activities would result in emissions of NOX that would exceed the applicable SCAQMD Regional threshold for this pollutant. As indicated in Table 4.3-11, *Overall Construction Emissions Summary (With Mitigation)*, implementation of Mitigation Measure MM 4.3-1 would reduce the Project's | Less than Significant with Mitigation Incorporated | **MM 4.3-1** During construction, all off-road diesel-powered equipment with a rated horsepower of 150 or greater shall meet EPA Tier 4 Final engine standards, where commercially available. Documentation demonstrating compliance with this requirement (e.g., equipment specification sheets, contracts, and/or certification from equipment suppliers) shall be submitted to the County of Riverside prior to the issuance of each applicable grading or building permit.<br><br>**CRDR 4.3-1** The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 1113, Architectural Coatings, by requiring that all architectural coatings must consist of low VOCs (i.e., VOCs of less than 50 grams per liter [g/L]) unless otherwise specified in the SCAQMD Table of Standards. | Project Applicant, Construction Contractors/Building and Safety Department<br><br>Project Applicant, Construction Contractors/ Building and Safety Department, SCAQMD | Prior to issuance of grading or building permit<br><br>During construction activities |

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| construction-related emissions of $NO_X$ to below the SCAQMD Regional threshold for this pollutant. Accordingly, with implementation of Mitigation Measure MM 4.3-1, the Project would be fully consistent with the SCAQMD 2022 AQMP, the Project's impacts due to a potential conflict with the AQMP would be reduced to below a level of significance. | | **CRDR 4.3-2** The Project is required to comply with applicable SCAQMD rules for construction activities on the Project site. In addition to the SCAQMD requirements listed above, additional SCAQMD rules that are currently applicable during construction activity for this Project include Rule 431.2 (Low Sulfur Fuel) and Rule 1186/1186.1 (Street Sweepers). | Project Applicant, Construction Contractors/ Building and Safety Department, SCAQMD | During construction activities |
| **Threshold b.:** As indicated in Table 4.3-9, the Project's long-term operational emissions would not exceed any of the SCAQMD Regional thresholds of significance. However, and as noted in Table 4.3-8, near-term construction activities would exceed the SCAQMD Regional threshold for NOX. As such, the Project result in a cumulatively considerable net increase of a criteria pollutant (NOX) for which the project region is non-attainment (O3) under an applicable federal or State ambient air quality standard. As indicated in Table 4.3-11, implementation of Mitigation Measure MM 4.3-1 would reduce the Project's construction-related emissions of $NO_X$ to below the SCAQMD Regional threshold for this pollutant. Accordingly, with implementation of Mitigation Measure MM 4.3-1, the Project would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, and impacts would be reduced to below a level of significance. | Less than Significant with Mitigation Incorporated | **CRDR 4.3-3** The Project is required to comply with the provisions of SCAQMD Rule 402, "Nuisance" which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public.<br><br>**CRDR 4.3-4** In accordance with SCAQMD Rule 445, no wood burning devices shall be installed in any dwelling units.<br><br>**CRDR 4.3-5** The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 403, "Fugitive Dust" by implementing the following dust control measures during construction activities, such as earth-moving activities, grading, and equipment travel on unpaved roads. Prior to grading permit issuance, Riverside County shall verify that the following notes are included on the grading plan. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors: | Project Applicant, Future Occupants/ Planning Department<br><br>Project Applicant, Construction Contractors/ Building and Safety Department | During construction activities and long-term operations<br><br>During construction activities |
| **Threshold c.:** As shown in Table 4.3-10, the Project's construction-related localized emissions | Less than Significant | • All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per | | |

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| of $NO_2$, CO, $PM_{10}$, and $PM_{2.5}$ would not exceed the applicable SCAQMD LSTs at the nearest sensitive receptors. A localized analysis for operational emissions was not required, as the Project does not include substantial stationary sources or long-term idling that would trigger LST evaluation under SCAQMD guidance. The Project would also not cause or contribute to a CO "hot spot," as anticipated traffic volumes would not approach levels identified in prior SCAQMD studies as having the potential to exceed CO ambient air quality standards. Additionally, the Project's Construction HRA demonstrates that the Project's near-term construction-related activities would not expose the MEIR, MEIW, or MEISC to cancer or noncancer risks exceeding the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively. Accordingly, the Project would not expose sensitive receptors that are located within one (1) mile of the Project site to substantial pollutant concentrations, and impacts would be less than significant.<br><br>**Threshold d.:** The proposed Project does not include land uses typically associated with the generation of substantial or objectionable odors, such as wastewater treatment plants, landfills, or industrial facilities. During construction, temporary odors may be generated from diesel equipment and application of architectural coatings; however, these activities would be short-term and intermittent in nature. The Project would be required to comply with SCAQMD Rule 402 (Nuisance) and Rule 1113 (Architectural | Less than Significant | hour (mph) per SCAQMD guidelines in order to limit fugitive dust emissions.<br>• The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at an interval of 2.1 hours (i.e., 4 times per day) or a movable sprinkler system shall be in place to ensure minimum soil moisture of 12% is maintained for actively graded or disturbed areas. Moisture content shall be verified with use of a moisture probe by the grading contractor.<br>• All access points to the Project site shall have track-out devices installed.<br>• The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 mph or less. | | |

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| Coatings), which limit odor emissions and ensure best practices during construction. During operation, the Project would consist primarily of residential uses, which are not typically associated with odor impacts. Solid waste would be stored in covered containers and removed regularly in compliance with Riverside County solid waste regulations. Given the nature of the land uses and required compliance with applicable air quality and waste regulations, construction- and operation-related odor impacts would be less than significant, and no mitigation is required. | | | | |
| **4.4 Biological Resources** | | | | |
| **Threshold a.:** The Project would not conflict with the SKR HCP, and impacts would be less than significant. The Project would not result in a conflict with the MSHCP Reserve Assembly requirements, and the Project's off-site improvements that occur within MSHCP Criteria Cells all occur within covered roadways under the MSHCP. Project impacts to 0.39-acre of MSHCP riverine and 0.05-acre of riparian areas (a total of 0.44-acre) would represent a potential conflict with Section 6.1.2 of the MSHCP, and impacts would therefore be significant. The Project would not result in impacts to narrow endemic plants, and thus would be consistent with Volume I, Section 6.1.3 of the MSHCP. The Project also would be consistent with the MSHCP UWIG requirements related to drainage, toxics, lighting, noise, invasive species, barriers, and grading/land development. Although the Project would not result in impacts to CAPSSA or NEPSSA plant | Less than Significant with Mitigation Incorporated | **MM 4.4-1** Prior to issuance of grading permits or other permits authorizing ground disturbance (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging), the Project Applicant shall provide evidence to Riverside County that Project impacts to 0.36- acre ( 5,766 linear feet) of Waters of the State under Regional Board jurisdiction, 0.44-acre of CDFW jurisdiction (0.39-acre non-riparian streambed and 0.05-acre riparian streambed), and 0.44-acre of riparian/riverine resources in the MSHCP (0.39-acre of MSHCP riverine and 0.05-acre of riparian areas) have been mitigated at a minimum 3:1 ratio (mitigation:impact) at the Riverpark Mitigation Bank or other mitigation bank, in-lieu program, or mitigation site as approved by the Western Riverside Regional Conservation Authority (RCA) and Wildlife Agencies.<br><br>**MM 4.4-2** To avoid take of active burrowing owl burrows (nests) and in accordance with MSHCP Objective 6, prior to issuance of grading permits or other permits authorizing ground disturbance (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging), the Project Applicant shall retain a | Project Applicant/Planning Department, Environmental Programs Department, CDFW, RCA<br><br>Project Applicant, Project Biologist/Planning Department | Prior to issuance of grading permits or other permits authorizing ground disturbance<br><br>Prior to issuance of grading permits or other permits authorizing ground disturbance |

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| species, and the Study Area does not occur within invertebrate, amphibian, and/or mammal survey areas, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities. Implementation of Mitigation Measure MM 4.4-1 would require compensatory mitigation for Project impacts to 0.44-acre of MSHCP riparian/riverine resources (0.39-acre of riverine and 0.05-acre of riparian areas) at a minimum 3:1 ratio through the purchase of credits from the Riverpark Mitigation Bank or other mitigation bank, in-lieu program, or mitigation site as approved by the RCA and Wildlife Agencies, which would ensure Project consistency with Section 6.1.2 of the MSHCP. In addition, implementation of Mitigation Measure MM 4.4-2 would ensure that appropriate pre-construction burrowing owl surveys are conducted prior to ground disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl. With implementation of the required mitigation, the Project would be fully consistent with all applicable MSHCP requirements, and Project impacts would be reduced to below a level of significance.<br><br>**Thresholds b. and c.:** Although the proposed Project would result in impacts to paniculate tarplant, impacts would be less than significant due to the low sensitivity of this species (CNPS 4.2) and because the portions of the Project site proposed for development are heavily disturbed and the onsite population of paniculate tarplant is relatively small. With implementation and | Less than Significant with Mitigation Incorporated | qualified biologist to perform a burrowing owl survey at all potentially suitable habitat sites within the Project's limits of disturbance within 30 days of the commencement of any ground-disturbing activities at the Project site, as discussed below.<br><br>• Pre-Construction Survey: The pre-construction survey shall be performed by a qualified biologist that will survey the site for the presence/absence of burrowing owls within 30 days prior to commencement of ground-disturbing activities at the Project site. The results of the survey should be submitted to Riverside County and the California Department of Fish and Wildlife (CDFW) within three days of survey completion. The preconstruction survey shall be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP.<br>• Burrowing Owl Management Plan: If active burrowing owl burrows are detected, the Project Applicant shall not commence activities until no sign is present that the burrows are being used by adult or juvenile owls or following CDFW approval of a Burrowing Owl Plan as described below. If owl presence is difficult to determine, a qualified biologist shall monitor the burrows with motion- activated trail cameras for at least 24 hours to evaluate burrow occupancy. The onsite qualified biologist will verify the nesting effort has finished according to methods identified in the Burrowing Owl Plan.<br><br>The Burrowing Owl Plan shall be prepared in accordance with guidelines in the CDFW Staff Report on Burrowing Owl (March 2012) and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The qualified biologist and Project Applicant shall | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| coverage of the Project under the MSHCP conservation goals, the Project would not have a significant impact on special-status animal species and impacts would be less than significant. However, the Study Area contains vegetation with the potential to support native nesting birds. The California Fish and Game Code prohibits mortality of native birds, including eggs. Thus, a significant impact could occur to nesting birds if grading or development were to occur during the nesting season (February 1 to August 31). Additionally, although not observed during focus surveys within the Study Area, the Study Area nonetheless contains suitable habitat for burrowing owls. MSHCP Objective 6 for burrowing owls requires that pre-construction surveys occur prior to site grading. Implementation of Mitigation Measure MM 4.4-2 would ensure that appropriate pre-construction burrowing owl surveys are conducted prior to ground disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl. With implementation of the required mitigation, Project impacts to the burrowing owl would be reduced to below a level of significance. In addition, in the event that Project construction activities occur during the nesting season for birds (February 1 to August 31), Mitigation Measure MM 4.4-3 would ensure pre-construction nesting surveys are conducted prior to commencement of construction activities, and further requires appropriate avoidance of any active nests that may be identified. Implementation of the required mitigation would ensure that Project impacts to sensitive wildlife | | coordinate with the County of Riverside, CDFW, and United States Fish and Wildlife Service (USFWS) to develop a Burrowing Owl Plan to be approved by the County, CDFW, and USFWS prior to commencing Project activities. The Burrowing Owl Plan shall describe proposed avoidance, relocation, monitoring, minimization, and/or mitigation actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls or information on the adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls shall also be included in the Burrowing Owl Plan. The County shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval.<br><br>If burrowing owls are observed within Project site(s) during Project implementation and construction, the Project Applicant shall notify CDFW immediately in writing within 48 hours of detection. A Burrowing Owl Plan shall be submitted to CDFW for review and approval within two weeks of detection and no Project activity shall continue within 1,000 feet of the burrowing owls until CDFW approves the Burrowing Owl Plan. The County shall be responsible for implementing appropriate avoidance and mitigation measures, including burrow avoidance, passive or active relocation, or other appropriate mitigation measures as identified in the Burrowing Owl Plan.<br><br>If ground-disturbing activities occur but the site is left | | |

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| species are reduced to below a level of significance.<br><br>**Threshold d.:** The Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and impacts would be less than significant.<br><br>**Threshold e.:** Implementation of the Project would result in permanent impacts to 0.05-acre of Disturbed Mulefat Scrub, which has components similar to the Southern Riparian Scrub plant community, and is the only sensitive natural community that occurs within the Project site; thus, Project impacts to 0.05-acre of Disturbed Mulefat Scrub would be significant prior to mitigation. Implementation of Mitigation Measure MM 4.4-1 would require compensatory mitigation for Project impacts to 0.44-acre of CDFW jurisdiction, which includes 0.05-acre of riparian streambed mapped as Disturbed Mulefat Scrub, at a minimum 3:1 mitigation-to-impact ratio through the purchase of mitigation credits at the Riverpark Mitigation Bank or other mitigation bank, in-lieu program, or mitigation site as approved by the RCA and Wildlife Agencies, which would reduce Project impacts to 0.05-acre of Disturbed Mulefat Scrub to below a level of significance.<br><br>**Threshold f.:** The Project would impact 0.36-acre (5,766 linear feet) of Waters of the State under | Less than Significant<br><br>Less than Significant with Mitigation Incorporated<br><br>Less than Significant with | undisturbed for more than 30 days, a preconstruction survey for burrowing owl shall be conducted within 3 days prior to initiation of Project activities and reported to CDFW as described above. If burrowing owl are found, the same coordination described above shall be necessary.<br><br>A final report shall be prepared by the qualified biologist documenting the results of the burrowing owl surveys and detailing avoidance, minimization, and mitigation measures. The final report shall be submitted to the City and CDFW within 30 days of completion of the survey and burrowing monitoring for mitigation monitoring compliance record keeping.<br><br>**MM 4.4-3** Prior to the issuance of grading permits, Riverside County shall ensure that the following note is included on the Project's grading plans. Project contractors shall be required to ensure compliance with this note and permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance. This note also shall be specified in bid documents issued to prospective construction contractors.<br><br>*"In order to avoid violation of the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Sections 3503, 3503.5, and 3513, vegetation clearing shall be conducted outside of the bird nesting season to the extent feasible. If avoidance of the nesting season is not feasible, a nesting bird survey shall be conducted by a qualified biologist within no more than 72 hours of such scheduled disturbance, to determine the presence of nests or nesting birds. The nest surveys shall include the Project site and adjacent areas where project activities have the potential to cause nest failure. The survey results shall be provided to the County's Planning Department. The Project Applicant shall* | Project Applicant, Construction Contractors/ Building and Safety Department | Prior to issuance of grading permits and during vegetation clearing activities |

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| Regional Board jurisdiction, 0.44-acre of CDFW jurisdiction (0.39-acre non-riparian streambed and 0.05-acre riparian streambed), and a total of 0.44-acre of MSHCP jurisdiction (0.39-acre non-riparian streambed and 0.05-acre riparian streambed). Implementation of Mitigation Measure MM 4.4-1 would require compensatory mitigation for Project impacts to 0.36-acre (5,766 linear feet) of Waters of the State under Regional Board jurisdiction, 0.44-acre of CDFW jurisdiction (0.39-acre non riparian streambed and 0.05-acre riparian streambed), and a total of 0.44-acre of MSHCP jurisdiction (0.39- acre non-riparian streambed and 0.05-acre riparian streambed) at a minimum 3:1 mitigation-to-impact ratio through the purchase of mitigation credits at the Riverpark Mitigation Bank or other mitigation bank, in-lieu program, or mitigation site as approved by the RCA and Wildlife Agencies, which would reduce Project impacts to jurisdictional resources to a level of significance. | Mitigation Incorporated | *adhere to the following:*<br><br>*1) The Project Applicant shall designate a biologist (Designated Biologist) experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.*<br>*2) Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than 3 days prior to the initiation of Project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the Project site; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.*<br><br>*If no nesting birds are observed during the survey, site preparation and construction activities may begin. If active nests are identified, avoidance or minimization measures shall be undertaken in consultation with the County of Riverside and CDFW. Measures shall include immediate establishment of an appropriate buffer zone to be established by a qualified biologist, and approved by the County of Riverside, based on their best professional judgement and experience. The buffer around the nest shall be delineated and flagged, and no construction activity* | | |
| **Threshold g.:** Aside from the MSHCP, which is addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). However, the Project site does not contain any oak trees subject to the Riverside County Oak Tree Management Guidelines. Additionally, the Project site does not occur at an elevation exceeding 5,000 feet amsl; thus, Riverside County Ordinance No. 559 is not | No Impact | | | |

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| applicable to the proposed Project. Therefore, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur. | | *shall occur within the buffer area until a qualified biologist determines nesting species have fledged and the nest is no longer active, or the nest has failed. The Designated Biologist shall monitor the nest at the onset of Project activities, and at the onset of any changes in such Project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the Designated Biologist determines that such Project activities may be causing an adverse reaction, the Designated Biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers will be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The onsite qualified biologist will review and verify compliance with these nesting avoidance buffers and will verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found. Within 30 days of completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to the County for mitigation monitoring compliance record keeping."*<br><br>**CRDR 4.4-1** Prior to issuance of grading permits, the Project Applicant shall make payment of Western Riverside County MSHCP fees pursuant to Riverside County Ordinance No. 810, *Establishing an Interim Open Space Mitigation Fee*.<br><br>**CRDR 4.4-2** Prior to issuance of grading permits, the Project Applicant shall make payment of fees pursuant to the Stephen's Kangaroo Rat Habitat Conservation Plan and Riverside County Ordinance No. 663, *Establishing the Riverside County Stephens' Kangaroo Rat Habitat Conservation Plan and Setting Mitigation Fees*. | Project Applicant/Planning Department<br><br>Project Applicant/Planning Department | Prior to issuance of grading permits<br><br>Prior to issuance of grading permits |

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| | | **CRDR 4.4-3** Pursuant to JPR 09-12-14-01 and HANS determination letter HANS 1995, prior to final building inspection the Project Applicant shall provide the Western Riverside County Regional Conservation Authority (RCA) with fee title/ownership and management responsibilities for 61.42 acres of proposed Conservation Area located within Planning Area 9 of proposed Specific Plan No. 380, Amendment No. 1. | Project Applicant/Planning Department | Prior to final building inspection |
| | | **CRDR 4.4-4** Prior to issuance of grading permits or other permits authorizing ground-disturbing activities, the Project Applicant shall provide the Riverside County Planning Department with copies of the appropriate Wildlife Agency permits to address impacts to 0.36-acre ( 5,766 linear feet) of Waters of the State under Regional Board jurisdiction and 0.44-acre of CDFW jurisdiction (0.39-acre nonriparian streambed and 0.05-acre riparian streambed), including a Waste Discharge Order pursuant to Section 13260 of the California Water Code from the San Diego Regional Water Quality Control Board (RWQCB), and a Section 1602 Streambed Alteration Agreement (SAA) from the California Department of Fish and Wildlife (CDFW). | Project Applicant/Planning Department, RWQCB,CDFW | Prior to issuance of grading permits or other permits authorizing ground-disturbing activities |
| **4.5 Cultural Resources** | | | | |
| **Thresholds a. and b.:** Although no significant historical resources, as defined by the CRHR and CEQA, were identified as part of the Project's CRA on site or within the Project's off-site improvement areas, there is a potential for previously-undiscovered historical resources to occur beneath the surface of areas planned for physical impact (i.e., grading) as part of the Project. Implementation of Mitigation Measures MM 4.5-1 through MM 4.5-7 would ensure that any historical resources identified on site or within the Project's off-site improvement areas during ground-disturbing activities are appropriately treated, | Less than Significant with Mitigation Incorporated | **MM 4.5-1 015 – Planning-CUL:** Artifact Disposition. In the event cultural resources are identified during ground disturbing activities, the landowner(s) shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the County Archaeologist that all 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), have been handled through the following methods. Any artifacts identified and collected during construction grading activities are not to leave the project area and shall remain onsite in a secure location until final disposition. Historic Resources All historic archaeological materials recovered during the archaeological investigations (this includes | Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department, Native American Monitor | During ground disturbing activities |

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| including if necessary curation of the historical artifact(s) at the Western Science Center in Hemet or as directed by the County Archaeologist. Implementation of the required mitigation would ensure that any potential impacts to subsurface historical sites or resources would be reduced to less-than-significant levels.<br><br>**Thresholds c. and d.:** The Project would not impact any known archaeological sites and would not cause a substantial adverse change in the significance of any known archaeological resources pursuant to California Code of Regulation, Section 15064.5. However, there is a possibility that previously-undiscovered subsurface archaeological resources may be impacted by development of the Project as proposed. Implementation of Mitigation Measures MM 4.5-1 through MM 4.5-7 would ensure that any archaeological sites or resources identified on site or within the Project's off-site improvement areas during ground-disturbing activities are appropriately treated as directed by the Archaeological Monitor, County Archaeologist, and Native American Monitor. Implementation of the required mitigation would reduce the Project's potential impacts to subsurface archaeological sites or resources to below a level of significance.<br><br>**Threshold e.:** The Project site and off-site improvement areas do not contain a cemetery and no known cemeteries are located within the immediate site vicinity. Additionally, the Project Applicant would be required to comply with the | Less than Significant with Mitigation Incorporated<br><br>Less than Significant | collections made during an earlier project, such as testing of archaeological sites that took place years ago), have been 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. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. Prehistoric and/or Tribal Cultural Resources One of the following treatments shall be applied. Preservation in-place, if feasible is the preferred option. 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. Reburial of the resources on the Project property. The measures for reburial shall be culturally appropriate as determined through consultation with the consulting Tribe(s)and include, at least, the following: Measures to protect the reburial area from any future impacts in perpetuity. Reburial shall not occur until all required cataloguing (including a complete photographic record) and analysis have been completed on the cultural resources, with the exception that sacred and ceremonial items, burial goods, and Native American human remains are excluded. No cataloguing, analysis, or other studies may occur on human remains grave goods, and sacred and ceremonial items. Any reburial processes shall be culturally appropriate and approved by the consulting tribe(s). 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. Human Remains Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a | | |

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| applicable provisions of California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et. seq., which would ensure that any human remains discovered on site are appropriately treated. Mandatory compliance with State law would ensure that Project impacts to human remains would be less than significant. | | final decision as to the treatment and their disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner 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 with the property owner concerning the treatment of the remains and any associated items as provided in Public Resources Code Section 5097.98.<br><br>**MM 4.5-2 015 – Planning-CUL:** 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 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 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. 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.<br><br>**MM 4.5-3 015 – Planning-CUL: Phase IV Cultural Monitoring Report.** Prior to Grading Permit Final Inspection, a Phase IV | Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department, Native American Monitor<br><br>Project Applicant, Project | Prior to issuance of grading permits and during ground disturbing activities and excavation<br><br>Prior to final grading inspection |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| | | 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 Monitoring Plan.<br><br>**MM 4.5-4 015 – Planning-CUL: Project Archaeologist/Monitor.** 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 coordination with the consulting tribe(s) that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural, tribal cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources 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 | Archaeologist/ County Archaeologist, Planning Department, Native American Monitor<br><br>Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department, Native American Monitor | <br><br>Prior to issuance of grading permit |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| | | 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.<br><br>**MM 4.5-5 015 – Planning-CUL: 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 cultural resources* are discovered, the following procedures shall be followed: All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the Project archaeologist shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal 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. 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.<br><br>** A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other. Tribal Cultural Resources are also considered cultural resources.<br>**If not already employed by the project developer, a County approved archaeologist and a Native American Monitor from the consulting tribe(s) shall be employed by the project developer to | Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department, Native American Monitor | In the event that cultural resources are encountered during construction activities |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| | | assess the significance of the cultural resource, attend the meeting described above, and to continue monitoring of all future site grading activities as necessary. | | |
| | | **MM 4.5-6 Preconstruction Meeting:** The Archaeological Monitor shall be invited to a preconstruction meeting with construction personnel and County and tribal representatives. The attending archaeologist shall review the provisions of the CRMP and answer any applicable questions. | Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department, Native American Monitor | Prior to construction activities |
| | | **MM 4.5-7 Construction Monitoring:** Full-time monitoring shall occur throughout the entire Project area, including all off-site improvement areas, during ground-disturbing activities. Full-time monitoring shall continue until the Archaeological Monitor required pursuant to Mitigation Measure MM 4.5-4 determines that the overall sensitivity of the Project area has been reduced from high to low as a result of mitigation monitoring. Should the monitor(s) determine that there are no cultural resources within the Project site or off-site improvement areas, or should the sensitivity be reduced to low during monitoring, all monitoring shall cease. | Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department, Native American Monitor | During ground-disturbing activities |
| | | **CRDR 4.5-1** Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code Section 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r). | Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department | In the event Native American human remains or associated grave goods are discovered on site |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| | | **CRDR 4.5-2** 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. | Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department, NAHC, County Coroner | In the event that human remains are discovered during grading activities |
| **4.6 Energy** | | | | |
| **Threshold a.:** Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be | Less than Significant | **CRDR 4.6-1** The following are applicable regulations and design requirements within the County of Riverside. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance | N/A | N/A |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State of California. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation.<br><br>**Threshold b.:** Energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other mixed use (residential/commercial retail) projects of similar scale and intensity that are operating in California, as the Project would be subject to current regulatory requirements, such as the 2022 and/or 2025 version of Title 24, which were not in effect when most existing developments were constructed. The CEC anticipates that the 2022 energy code will provide $1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons. Moreover, the Project would be subject to compliance with the Riverside County CAP and would be required to achieve a minimum of 100 points per the CAP screening tables, which would further reduce the Project's energy demand. Based on the analysis presented herein, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than | Less than Significant | with applicable City regulations and design requirements.<br><br>• Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles.<br><br>• Renewable Portfolio Standards (SB 100). Increases California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.<br><br>• CCR Title 13, Motor Vehicles, Section 2449(d)(3), Idling. Grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling. | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| significant. | | | | |
| **4.7 Geology and Soils** | | | | |
| **Thresholds a. and c.:** The potential for surface fault rupture to occur at the site is considered low. Impacts due to rupture of a known earthquake would therefore be less than significant. However, the Project site is located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address seismic-related hazards in conformance with the CBSC and the Riverside County Building Code. With implementation of the required mitigation, impacts due to strong seismic ground shaking would be reduced to less-than-significant levels. | Less than Significant with Mitigation Incorporated | **MM 4.7-1** Prior to issuance of grading or building permits, the Riverside County Building and Safety Department shall verify that all of the recommendations given in the Project's May 25, 2021 "Updated Geotechnical and Infiltration Evaluation, Proposed Single-Family Residential Development, Keller Crossing Project, Northwest Corner of Winchester Road and Keller Road, Winchester Area of Riverside County, California," prepared by GeoTek, Inc. and included as Technical Appendix F1 to the Project's EIR, are incorporated into the construction and grading plans. Alternatively, the Project shall comply with the findings and recommendations of any geotechnical studies that may be required in association with future grading and/or building permits. | Project Applicant/ Building and Safety Department | Prior to issuance of grading or building permits |
| | | **CRDR 4.7-1** The Project is required to comply with the provisions of County Ordinance Nos. 457 and 460. Ordinance No. 457 requires that all projects comply with California Building Codes and the International Building Codes. These codes establish site-specific investigation requirements, construction standards, and inspection procedures to ensure that development does not pose a threat to the health, safety, and welfare of the public, and includes requirements related to erosion. Ordinance No. 460 sets forth soil erosion control requirements and requires preparation and implementation of a wind erosion control plan. | Project Applicant/ Building and Safety Department | Prior to approval of building or grading permits |
| **Threshold b.:** The Project site is situated in an area of generalized low/very low liquefaction potential. Based on site observations and subsurface investigations conducted by GeoTek, the Project site is not susceptible to soil liquefaction based on the depth to groundwater being in excess of 50 feet below grade and due to the presence of shallow dense soil/bedrock materials across most of the Project site. Also, the potential for seismically induced settlement at the property is considered to be nil because of the minimal thickness of soil atop bedrock. Accordingly, the Project would not be subject to | Less than Significant | **CRDR 4.7-2** The Project is required to comply with the provisions of SCAQMD Rule 403, by addressing blowing dust from the Project's construction activities. | Project Applicant, Construction Contractors/ Building and Safety Department, SCAQMD | During construction activities |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| seismic-related ground failure, including liquefaction, and impacts would therefore be less than significant.<br><br>**Threshold d.:** The Project site is not susceptible to landslide or rockfall hazards, and impacts would be less than significant. Impacts due to lateral spreading and collapse hazards could occur if proposed grading and development is not conducted in accordance with the site-specific recommendations of the Project's Geotechnical Update (Technical Appendix F1). Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address the potential for lateral spreading and collapse hazards. With implementation of the required mitigation, impacts due to lateral spreading and collapse would be reduced to less-than-significant levels.<br><br>**Threshold e.:** The County of Riverside indicates that the Project site is "susceptible" to subsidence. However, the potential for seismically-induced settlement at the property is considered to be nil because of the minimal thickness of soil atop bedrock. As such, the Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in ground subsidence, and impacts would therefore be less than significant. | Less than Significant with Mitigation Incorporated<br><br>Less than Significant | **CRDR 4.7-3** The Project is required to comply with the provisions of the Project's National Pollution Discharge Elimination System (NPDES) permit, and the Project's Storm Water Pollution Prevention Plan (SWPPP). Compliance with the NPDES permit and the SWPPP would identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from stormwater and non-stormwater discharges. | Project Applicant, Construction Contractors/ Building and Safety Department, San Diego RWQCB | During construction activities and long-term operations |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| **Threshold f.:** The Project site is not subject to volcanic hazards or hazards associated with seiches. Although several existing hill forms occur in the northern portion of the Project site and would be preserved as open space, due to the relatively shallow depth to bedrock that occurs across the Project site, the risk of mudflow associated with these hill forms would be low. As such, impacts due to mudflow hazards would be less than significant. | Less than Significant | | | |
| **Thresholds g.:** The Project site would be graded in a manner that largely approximates the site's existing topographic conditions. The Project would require a total of approximately 1.2 million cubic yards (cy) of cut and fill quantities. Earthwork activities are expected to balance on site and no import or export of soils would be required. Thus, the Project would not result in a substantial change in topography or ground surface relief features, and impacts would be less than significant. | Less than Significant | | | |
| **Thresholds h.:** All proposed slopes on site would be constructed at a gradient of 2:1. Although the slopes adjacent to proposed SP 380A1 Planning Area 10 would exceed a height of 10 feet, site-specific recommendations are provided in the Project's Geotechnical Update (Technical Appendix F1) to ensure gross slope stability. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to confirm that any slopes | Less than Significant with Mitigation Incorporated | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| higher than 10 feet are grossly stable. In addition, the 2024 Supplemental Rock Hardness Evaluation (Appendix F3) supports the feasibility of slope construction by confirming that blasting is unlikely to be required and that conventional excavation methods are sufficient. With implementation of the required mitigation, impacts associated with unstable slopes would be reduced to less-than-significant levels. | | | | |
| **Thresholds i.:** According to the Project's Phase I Environmental Site Assessment (EIR Technical Appendix H), and based upon the historic and present property use, there are no known septic tanks (systems) or other subsurface sewage disposal systems that exist on the Project site. As such, no impact associated with subsurface sewage disposal would occur. | No Impact | | | |
| **Threshold l..:** Sewer service to the proposed Project would be provided by the EMWD, and no septic tanks or alternative wastewater disposal systems are proposed as part of the Project. Accordingly, no impact would occur. | No Impact | | | |
| **Thresholds j. and m.:** The Project would not result in substantial soil erosion or loss of topsoil. The Project Applicant would be required to obtain a NPDES permit for construction activities and adhere to a Stormwater Pollution Prevention Plan (SWPPP) as well as SCAQMD Rule 403 and Riverside County Ordinance Nos. 457 and 460. With mandatory compliance to these regulatory requirements, the potential for water and wind | Less than Significant | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| erosion impacts during construction would be less than significant. Following development, wind and water erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, the Project is required by law to implement a WQMP during operation, which would preclude substantial erosion impacts in the long-term. Accordingly, impacts would be less-than-significant.<br><br>**Threshold k.:** Impacts due to expansive soils could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the of the Project's Geotechnical Investigation (Technical Appendix F1). This is evaluated as a potentially significant impact for which mitigation would be required. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address expansive soils on site. With implementation of the required mitigation, impacts associated with expansive soils would be reduced to less-than-significant levels. | Less than Significant with Mitigation Incorporated | | | |
| **4.8 Greenhouse Gas Emissions** | | | | |
| **Threshold a:** As discussed under the analysis of Threshold a., the County of Riverside's CAP Update establishes a three-step process to evaluate GHG emissions at the project level. Projects that exceed the CAP screening threshold | Less than Significant with Mitigation Incorporated | **MM 4.8-1** Prior to issuance of building permits, and in accordance with measure R2-CE1 of the County's Climate Action Plan (CAP) Update, future implementing building permits that involve more than 75 new dwelling units of residential development or one or more new buildings totaling more than | Project Applicant/Planning Department | Prior to issuance of building permits |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| of 3,000 $MTCO_2e$ per year must demonstrate consistency with the CAP by implementing measures from the CAP Screening Tables totaling at least 100 points. As shown in Table 4.8-4, the Project would generate approximately 10,004.48 $MTCO_2e$ per year, which would exceed the 3,000 $MTCO_2e$/year screening threshold. Although the Project would be required to achieve 100 points pursuant to the CAP Screening Tables, and in order to provide a conservative analysis of the Project's impacts due to GHGs, it is concluded that the Project's cumulatively-considerable impacts due to GHG emissions would be potentially significant prior to mitigation. Implementation of Mitigation Measure MM 4.8-1 would ensure that the Project complies with CAP Update Measure R2-CE1 by requiring the Project Applicant to offset the Project's energy demands through on-site renewable energy production. Mitigation Measure MM 4.8-2 would require the Project to incorporate GHG reduction measures from the County of Riverside's CAP Screening Tables totaling at least 100 points. Mitigation Measure MM 4.8-2 would ensure consistency with the CAP Update's efficiency requirements for projects that exceed the 3,000 $MTCO_2e$/year screening threshold. Because the CAP Update is aligned with statewide GHG reduction goals under SB 32 and the 2022 Scoping Plan, compliance with Mitigation Measures MM 4.8-1 and MM 4.8-2 would reduce the Project's GHG emissions to a level that is not cumulatively considerable. Therefore, with implementation of mitigation, impacts related to GHG emissions would be | | 100,000 gross square feet of commercial, office, industrial, or manufacturing development shall be required to offset the energy demand through renewable energy production. Renewable energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development, meet or exceed 20% of energy demand for multi-family residential development, and meet or exceed 30% of energy demand for single-family residential development.<br><br>**MM 4.8-2** Prior to issuance of building permits for any of the Project's residential uses, the Project Applicant shall demonstrate that appropriate building construction measures shall apply to achieve a minimum of 100 points per Appendix D to the Riverside County 2019 Climate Action Plan (CAP) Update. The conceptual measures anticipated for the Project are listed in Table ES-2 of the Project's Greenhouse Gas Analysis (GHGA) technical report (appended to the Project's EIR as Technical Appendix G). The conceptual measures may be replaced with other measures as listed in Appendix D to the 2019 Riverside County CAP Update, as long as they are replaced at the same time with other measures that in total achieve a minimum of 100 points per Appendix D to the 2019 Riverside County CAP Update. The County shall verify implementation of the identified measures prior to final building inspection.<br><br>**CRDR 4.8-1** The Project would be required to comply with all mandates imposed by the State of California and SCAQMD aimed at the reduction of air quality emissions. Those that are applicable to the Project and that would assist in the reduction of greenhouse gas emissions are listed below:<br><br>• Global Warming Solutions Act of 2006 (AB32)<br>• Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles. | Project Applicant/Planning Department<br><br>Project Applicant/Planning Department | Prior to issuance of building permits<br><br>During construction activities and long-term operation |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| reduced to a less-than-significant level.<br><br>**Threshold b:** The Project would be consistent with or otherwise would not conflict with the CARB 2022 Scoping Plan. However, the Project has the potential to conflict with the Riverside County CAP Update if the Project were unable to achieve 100 points pursuant to the CAP Screening Tables. Implementation of Mitigation Measure MM 4.8-1 would ensure that the Project complies with CAP Update Measure R2-CE1 by requiring the Project Applicant to offset the Project's energy demands through on-site renewable energy production. Mitigation Measure MM 4.8-2 would require the Project to incorporate GHG reduction measures from the County of Riverside's CAP Screening Tables totaling at least 100 points. With implementation of with Mitigation Measures MM 4.8-1 and MM 4.8-2, the proposed Project would be fully consistent with the County's CAP Update, and the Project's impacts due to a potential conflict with the CAP Update would be reduced to less-than-significant levels. Because the CAP Update is aligned with the State's GHG reduction goals outlined in SB 32 and the 2022 Scoping Plan, compliance with Mitigation Measures MM 4.8-1 and MM 4.8-2 would ensure the Project does not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, with mitigation, impacts related to plan consistency would be reduced to a less-than-significant level. | Less than Significant Impact with Mitigation Incorporated | • Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020.<br>• Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions.<br>• Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020.<br>• Senate Bill 32 (SB 32). Requires the state to reduce statewide greenhouse gas emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. | | |
| **4.9 Hazards and Hazardous Materials** | | | | |
| **Thresholds a. and b.:** Based on the Phase I ESA | Less than | **CRDR 4.9-1** All future contracts with construction contractors | Project Applicant, | Future contracts |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| prepared by Tetra Tech (Technical Appendix H), there are no indications of on-site or off-site RECs or VECs on the Project site under existing conditions. In addition, the Project's Limited Phase II ESA (Technical Appendix H2) concluded that all detected concentrations of metals, hydrocarbons, and pesticides were either non-detect or below applicable residential screening thresholds. No additional investigation or remediation was recommended. Furthermore, during Project construction and operation, mandatory compliance with federal, State, and local regulations would ensure that the Project as proposed would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials. | Significant | shall comply with all applicable regulations and requirements promulgated by the federal Occupational Safety and Health Administration (OSHA).<br><br>**CRDR 4.9-2** The Project shall comply with Title 22, Division 4.5 of the California Code of Regulations, which requires residents and employees to dispose of household hazardous waste, including pesticides, batteries, old paint, solvents, used oil, antifreeze, and other chemicals, at a Household Hazardous Waste Collection Facility.<br><br>**CRDR 4.9-3** The Project shall comply with Title 22, Division 4.5, Chapter 11 of the California Code of Regulations which requires fluorescent lamps, batteries, and mercury thermostats be recycled or taken to a Household Hazardous Waste Collection Facility. | Construction Contractors/ Building & Safety Department, OSHA<br><br>As set forth by Title 22, Division 4.5 of the California Code of Regulations<br><br>As set forth by Title 22, Division 4.5 of the California Code of Regulations | with construction contractors<br><br>As set forth by Title 22, Division 4.5 of the California Code of Regulations<br><br>As set forth by Title 22, Division 4.5 of the California Code of Regulations |
| **Threshold c.:** The Project would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. No emergency facilities exist on the Project site, and the site does not serve as an emergency evacuation route. Thus, impacts would be less than significant. | Less than Significant | | | |
| **Threshold d.:** There are no existing or planned schools within one-quarter mile of the Project site. The nearest school the Project site is the Harvest Hill STEAM Academy, located approximately 0.5-mile southwest of the Project site. With mandatory regulatory compliance, the Project would not emit hazardous emissions, or handle hazardous or acutely hazardous materials, | No Impact | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| substances, or waste within one-quarter mile of an existing or proposed school, and no impact would occur. | | | | |
| **Threshold e.:** The analysis conducted by Tetra Tech included a review of regulatory databases, and determined that the Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Tetra Tech, 2020, p. ES-2-ES-8). As such, the Project would not create a significant hazard to the public or the environment due to the Project site's inclusion on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and no impact would occur. | No Impact | | | |
| **Threshold f., g.., and h:** The Project site is not located within two miles of a public airport or within an airport land use plan, and there are no components of the proposed Project that would affect airport operations. The closest airport is the French Valley Airport located roughly 3.3 south miles southwest of the Project site. The Project site is located outside of the compatibility zones for the French Valley Airport, indicating that the Project site is not subject to airport-related hazards. Therefore, the Project would not result in an inconsistency with an Airport Master Plan, would not require review by the Airport Land Use Commission, and would not result in a safety hazard for people residing or working in the Project area. Impacts would be less than significant. | No Impact | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| **Threshold i:** There are no active private airstrips in the Project vicinity. The nearest active private airport is the Skylark Field Airport, located 11.7 miles west of the Project site. The Project site is not located within the AIA for this facility, and the Project would not be subject to substantial safety hazards due to aircraft operations at the Skylark Field Airport. As such, the Project would not result in a safety hazard for people residing or working in the Project area, and no impact would occur. | No Impact | | | |
| **4.10 Hydrology and Water Quality** | | | | |
| **Thresholds a., b., and i.:** The Project would be served potable water by the Eastern Municipal Water District (EMWD), and no groundwater wells are proposed on site. Accordingly, the Project would not directly extract groundwater, and direct impacts to groundwater supplies would be less than significant. Although the Project would increase impervious surface area on site, the total runoff volume generated from the site would be managed through the Project's proposed drainage system, including on-site water quality and detention basins. Following treatment, runoff would be conveyed to downstream facilities within the Santa Margarita River watershed, where groundwater recharge would continue to occur through existing unlined channels and watercourses. Thus, the Project would not interfere substantially with groundwater recharge or contribute to long-term groundwater depletion. With respect to water quality, during construction the Project Applicant would be required to comply with the NPDES General Construction Permit and | Less than Significant | **CRDR 4.10-1** The Project Applicant is required to comply with the provisions of the Project's NPDES permit, and the Project's SWPPP. Compliance with the NPDES permit and the SWPPP would identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from storm water and non-stormwater discharges during construction activities. | Project Applicant/Building and Safety Department | During construction activities |

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| prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) that identifies Best Management Practices (BMPs) to control erosion, sediment transport, and pollutant discharge. Compliance with the SWPPP and the San Diego Basin Plan would ensure that water quality impacts during grading and site preparation would remain less than significant. During long-term operation, all runoff generated on site would be captured and treated by water quality and detention basins in accordance with the Preliminary Water Quality Management Plan prior to discharge into the downstream watershed. Accordingly, the Project would not violate water quality standards or waste discharge requirements, substantially degrade surface or groundwater quality, deplete groundwater supplies, or conflict with the San Diego Basin Plan. Impacts would be less than significant.<br><br>**Thresholds c. and f.:** Grading proposed as part of the Project would generally maintain the existing drainage patterns on the site, with runoff continuing to flow from the higher elevations in the north toward the south and southeast portions of the site and then offsite toward the southeast. The Project would include construction of on-site storm drain infrastructure and detention basins designed to collect, treat, and detain stormwater flows consistent with County standards. As documented in the Project's Drainage Study (Technical Appendix I1), the Project's drainage system has been designed to ensure that post-development peak flows do not exceed pre- | Less than Significant | | | |

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| development conditions for 100-year storm events. The basins and related conveyance infrastructure would reduce total peak flows from the site, thereby preventing downstream flooding and avoiding alteration of any natural drainage alignments or receiving water features. Additionally, because downstream drainage facilities are adequately sized to accommodate existing runoff and because peak runoff from the Project site would not increase under proposed conditions, the Project would not contribute runoff water that could exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.<br><br>**Threshold d.:** With mandatory adherence to the SWPPP requirements under the NPDES General Construction Permit, effects associated with construction-related erosion, sedimentation, and stormwater discharge would be minimized through the implementation of Best Management Practices (BMPs). These measures would reduce the potential for adverse impacts to downstream water quality and flood control systems to less-than-significant levels during the construction phase. Following buildout, large portions of the Project site would consist of impervious surfaces, with pervious surfaces limited to designated landscaped and open space areas. Compared to existing undeveloped conditions, the potential for on-site erosion hazards would be substantially reduced, as the site would be fully graded, stabilized, and served by a permanent drainage system. Additionally, as documented in the | Less than Significant | | | |

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| Project's Drainage Study, implementation of the Project's proposed drainage improvements would not result in an increase in peak flows from the Project site under 100-year storm conditions, thereby ensuring that post-development runoff would not result in downstream channel degradation or erosion in areas tributary to the Project site. Long-term erosion impacts would therefore be less than significant. | | | | |
| **Thresholds e. and g.:** The Project site is located outside of mapped 100-year floodplains, according to data published by FEMA. As such, the site is not subject to inundation from riverine flood hazards under existing or projected future conditions. The Project's proposed storm drain infrastructure, including detention basins and conveyance facilities, has been designed in accordance with County of Riverside flood control standards to manage peak runoff and minimize the potential for on-site or off-site flooding. As documented in the Project's Drainage Study, the Project would not result in an increase in peak flows compared to existing conditions during the 100-year storm event. As such, the Project would not substantially increase the rate or volume of surface runoff in a manner that would result in flooding onsite or downstream, nor would it impede or redirect flood flows. Impacts would be less than significant. | Less than Significant | | | |
| **Threshold h.:** The Project site is located approximately 31 miles northeast of the Pacific Ocean and is therefore not at risk of tsunami | No Impact | | | |

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| inundation. According to Figure 10 of the Southwest Area Plan (SWAP), the Project site is also not located within a mapped dam inundation area for any nearby reservoirs. As such, the site is not subject to seiche hazards associated with large bodies of water such as Lake Skinner or Diamond Valley Lake. In addition, as discussed under the analysis of Threshold g, areas planned for development on site are not located within a mapped FEMA 100-year flood zone, and the Project site is not subject to riverine flood hazards. Accordingly, the Project would not risk the release of pollutants due to inundation from floods, tsunamis, or seiches. Impacts would be less than significant. | | | | |
| **4.11 Land Use and Planning** | | | | |
| **Threshold a.:** The Project would not conflict with the General Plan, SWAP, the SCAG 2024-2050 RTP/SCS, or any other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Additionally, there are no impacts due to land use incompatibility that have not already been evaluated and mitigated to the maximum feasible extent in relevant sections of this EIR; therefore, Project impacts due to land use incompatibility would be less than significant | Less than Significant | Impacts would be less than significant; therefore, mitigation measures are not required. | N/A | N/A |
| **Threshold b.:** The Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community), and impacts would be less than significant. | No Impact | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| **4.12 Mineral Resources** | | | | |
| **Threshold a.:** The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact to known mineral resources. | No Impact | No impacts to mineral resources would occur with implementation of the proposed Project; thus, mitigation measures are not required. | N/A | N/A |
| **Threshold b.:** The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan, and no impact would occur. | No Impact | | | |
| **Threshold c.:** The Project would not be an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and no impact would occur. | No Impact | | | |
| **Threshold d.:** The Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no impact would occur. | No Impact | | | |
| **4.13 Noise** | | | | |
| **Thresholds a. and b.:** The Project does not involve an airport-related component, and would not create or exacerbate aircraft-related noise in the local area. The Project site also occurs well outside of the 55 dBA CNEL contours for the French Valley Airport and would not be exposed to substantial airport-related noise associated with French Valley Airport. Additionally, the Project would not be exposed to substantial noise levels associated with private airstrips. As such, the | Less than Significant | **MM 4.13-1** Construction Noise Barriers. To reduce construction noise at Receiver R4 and R5, prior to issuance of grading or building permits, Riverside County shall ensure that an 8-foot-high noise barrier (temporary or permanent) has been installed at the southern Project site boundary in the approximate location identified on Exhibit ES-A of the Project's Noise Impact Analysis *(Technical Appendix J* to the Project's Environmental Impact Report), which shall remain in place for the entirety of construction activities on site. The noise control barrier shall meet the following standards: | Project Applicant, Construction Contractors/ Building and Safety Department | Prior to issuance of grading or building permits |

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| Project would not expose people residing or working in the Project area to excessive airport-related noise levels, and impacts would be less than significant.<br><br>**Threshold c.:** On-site construction activities would expose nearby sensitive receptors to noise levels ranging from 59.7 to 66.7 dBA Leq, which would not exceed the identified threshold of significance of 80 dBA Leq; thus, construction-related noise impacts would be less than significant. However, the Project is anticipated to result in a construction-related noise increase of 19.4 dBA Leq at Receptor R4 and 17.8 dBA Leq at Receptor R5, both of which would exceed the threshold of significance of 12.0 dBA Leq. Thus, prior to mitigation, Project-related construction noise level increases would represent as significant direct and cumulatively-considerable impact of the proposed Project. Implementation of Mitigation Measure MM 4.13-1 would ensure that temporary or permanent noise attenuation barriers are constructed at the southern Project site boundary and would reduce Project-related noise increases during Project construction activities such that the Project-related increases at Receptors R4 and R5 would be reduced to 8.3 dBA Leq and 7.6 dBA Leq, respectively, both of which would be below the identified noise level increase criterion of 12.0 dBA Leq, resulting in a less-than-significant impact.<br><br>Under long-term operational conditions, the Project-related operational noise level increases | Less than Significant with Mitigation | A. The noise control barriers shall present a solid face from top to bottom.<br>B. The noise barriers shall be maintained, and any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired.<br>C. The temporary noise barrier shall be constructed using one of the following materials with no decorative cutouts or line-of-sight openings between shielded areas and the noise source:<br>• An acoustical blanket (e.g. vinyl acoustic curtains, quilted blankets, or equivalent) attached to the construction site perimeter fence or equivalent temporary fence posts.<br><br>**MM 4.13-2** Project Traffic-Related Noise Mitigation (Off Site). To reduce Project-related traffic noise affecting nearby sensitive receivers, prior to final building inspection for any of the Project's proposed residential uses, Riverside County shall ensure that Keller Road, between Leon Road and Winchester Road, has been paved with Rubberized Hot-Mix Asphalt (RHMA) or Open-Graded Friction Course (OGFC).<br><br>**MM 4.13-3** On-Site Exterior Traffic Noise Mitigation. In order to address exterior traffic-related noise levels affecting residential dwelling units within Planning Area 3 of Specific Plan No. 380, Amendment No. 1, prior to final building inspection for the Project's residential uses within Planning Area 3 facing Keller Road, Riverside County shall verify that a six-foot-tall noise barrier has been constructed between Keller Road and the proposed residential dwelling units in Planning Area 3 of Specific Plan No. 380, Amendment No. 1. The required noise control barrier shall be constructed so that the top of each wall extends to the | Project Applicant, Construction Contractors/ Building and Safety Department<br><br>Project Applicant, Construction Contractors/ Building and Safety Department | Prior to final building inspection<br><br>Prior to final building inspection |

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| would satisfy the operational noise level increase criteria at the nearest sensitive receiver locations and the impact would be less than significant.<br><br>Based on the significance criteria for off-site traffic noise presented in Table 4.13-5, existing noise-sensitive uses on the following study area roadway segment are shown to experience significant off-site traffic noise level increases due to the Project traffic under EAC (2030) with Project conditions:<br>• Keller Road east of Leon Road (Segment #22)<br>• Keller Road east of Pourroy Road (Segment #23)<br><br>Accordingly, Project traffic-related noise impacts to the above-listed roadway segments represent a significant impact of the proposed Project for which mitigation would be required. The Project Applicant would be required pursuant to Mitigation Measure MM 4.13-2 to repave Keller Road between Leon Road and Winchester Road with Rubberized Hot-Mix Asphalt (RHMA) or Open-Graded Friction Course (OGFC). Implementation of Mitigation Measure MM 4.13-2 would serve to reduce the noise level increases at neighboring noise-sensitive land uses along Keller Road by at least 4 dBA CNEL. With implementation of Mitigation Measure MM 4.13-2, the Project's off-site traffic-related noise impacts along Keller Road between Leon Road and Winchester Road would be reduced to less-than-significant levels. | | recommended height above the pad elevation of the lot it is shielding. When the road is elevated above the pad elevation, the barrier shall extend to the recommended height above the highest point between the residential home and the road. The barrier shall provide a weight of at least 4 pounds per square foot of surface area, or have a minimum transmission loss of 20 dBA, with no decorative cutouts or line-of-sight openings between shielded areas and the roadways. The barrier must present a solid face from top to bottom, and all gaps (except for weep holes) should be filled with grout or caulking.<br><br>**MM 4.13-4** <u>On-Site Interior Noise Mitigation – All Residential Units</u>. In order to address interior noise levels associated with the Project's proposed residential uses, prior to issuance of building permits for any of the Project's residential uses, Riverside County shall review the Project's plans to ensure that all residential units are provided with a "windows closed" condition and a means of mechanical ventilation (e.g., air conditioning). Prior to final building inspection, Riverside County shall ensure that these conditions have been satisfied.<br><br>**MM 4.13-5** <u>Additional On-Site Interior Noise Mitigation – Planning Areas 4 and 5.</u> In order to address interior noise levels associated with multi-family uses in Planning Area 4 of Specific Plan No. 380, Amendment No. 1, prior to issuance of building permits Riverside County shall review the plans to ensure that all residential dwelling units in Planning Area 4 facing Winchester Road are provided with upgraded windows and sliding glass doors with minimum Sound Transmission Class (STC) ratings of 33 and 29, respectively. In addition, in order to address interior noise levels associated with multi-family uses within Planning Area 5 of Specific Plan No. 380, Amendment No. 1, prior to issuance of building permits Riverside County shall review the plans to ensure that all residential dwelling units within Planning Area 5 that face | Project Applicant, Construction Contractors/ Building and Safety Department<br><br>Project Applicant, Construction Contractors/ Building and Safety Department | Prior to issuance of building permits<br><br>Prior to issuance of building permits |

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| Additionally, and although not considered to comprise a significant impact under CEQA, the Project's proposed residential uses would be exposed to interior and exterior traffic-related noise levels exceeding the County's standards of 45 dBA CNEL and 65 dBA CNEL, respectively, and as such on-site noise attenuation measures would be required. Implementation of Mitigation Measure MM 4.13-3 would ensure that a minimum six-foot-tall noise barrier is constructed between Keller Road and future residential dwelling units within SP 380A1 Planning Area 3. With implementation of the required mitigation, potential on-site exterior noise impacts would be reduced to less-than-significant levels. Mitigation Measures MM 4.13-4 and MM 4.13-5 have been identified to ensure that future residential uses on site meet the County's interior noise standard of 45 dBA CNEL. With implementation of the required mitigation, the on-site interior traffic noise levels would be reduced to less than significant.<br><br>**Threshold d.:** The proposed Project would not include any operational components (such as heavy rail, industrial equipment, or frequent large truck activity) that would result in substantial groundborne vibration or groundborne noise levels. Therefore, operational vibration impacts would be negligible. During construction, typical activities such as grading, foundation work, and paving may generate localized groundborne vibration. However, at distances ranging from 13 to 668 feet from Project construction activities, | Less than Significant with Mitigation Incorporated | Winchester Road are provided with upgraded second floor windows and sliding glass doors with minimum STC ratings of 32. The required upgraded windows and sliding glass doors shall meet the following standards:<br><br>• <u>Windows/Sliding Glass Doors:</u> All residential units require windows and sliding glass doors that have well-fitted, well-weather-stripped assemblies, and the following sound transmission class (STC) ratings:<br>1. 1. Residential land uses in South Planning Area 4 will require upgraded windows and sliding glass doors with a minimum STC Rating of 33 (all floors), North Planning Area 4 will require upgraded windows and sliding glass doors with a minimum STC Rating of 29 (all floors), and Planning Area 5 require upgraded windows and sliding glass doors with minimum STC ratings of 32 (second floor);<br>2. All other residential lots require windows and sliding glass doors with minimum sound transmission class (STC) ratings of 27.<br>• <u>Exterior Doors (Non-Glass)</u>: All exterior doors shall be well weather-stripped and have well-sealed perimeter gaps around the doors to achieve the STC ratings recommended below<br>3. Residential land uses in South Planning Area 4 will require upgraded doors with a minimum STC Rating of 33 (all floors), North Planning Area 4 will require upgraded doors with a minimum STC Rating of 29 (all floors), and Planning Area 5 require upgraded doors with minimum STC ratings of 32 (second floor);<br>4. All other residential lots require doors with minimum sound transmission class (STC) | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| construction vibration velocity levels are estimated to range from less than 0.01 to 0.31 PPV (in/sec) and would exceed the County of Riverside threshold of 0.30 PPV (in/sec) at receiver location R4. Thus, prior to mitigation, Project construction-related vibration impacts at location R4 would represent a potentially significant direct impact for which mitigation would be required. Implementation of Mitigation Measure MM 4.13-6 would ensure that vibratory rollers are prohibited from operating within 15 feet of the western or southern site boundaries. With implementation of the required mitigation, Project construction-related vibration impacts would be reduced to less-than-significant levels. | | ratings of 27<br>• Exterior Walls: At any penetrations of exterior walls by pipes, ducts, or conduits, the space between the wall and pipes, ducts, or conduits shall be caulked or filled with mortar to form an airtight seal.<br>• Roof: Roof sheathing of wood construction shall be per manufacturer's specification or caulked plywood of at least one-half inch thick. Ceilings shall be per manufacturer's specification or well-sealed gypsum board of at least one-half inch thick. Insulation with at least a rating of R-19 shall be used in the attic space.<br>• Ventilation:<br>5. Arrangements for any habitable room shall be such that any exterior door or window can be kept closed when the room is in use and still receive circulated air. A forced air circulation system (e.g. air conditioning) or active ventilation system (e.g. fresh air supply) shall be provided which satisfies the requirements of the Uniform Building Code.<br>• Future Noise Studies: Final noise studies shall be prepared for future residential uses within Planning Areas 1, 2, 3, 4, and 5 prior to obtaining building permits for the project. This report shall finalize the mitigation measures described in this study using the precise grading plans and actual building design specifications, and may include additional mitigation, if necessary, to meet the interior noise level standards for residential (45 dBA CNEL) land uses. These noise studies would utilize any recommendations identified in this study and use the precise grading plans and actual building design specifications to identify any additional mitigation, such as exterior noise barriers and/or building materials (e.g., sound transmission class ratings for windows and | | |

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| | | doors), if necessary, based on the site-specific noise impacts within these planning areas.<br><br>**MM 4.13-6** Construction-Related Vibration. Prior to issuance of grading or building permits, and in order to reduce potentially significant vibration-related impacts, Riverside County shall review the grading or building plans to ensure that a note is included requiring the implementation of a 15-foot heavy construction equipment exclusion zone, which shall prohibit the use of vibratory rollers within 15 feet of occupied sensitive receiver locations along the western and southern boundaries of the Project site. Project construction contractors shall permit periodic site visits by County staff to ensure compliance with the heavy construction equipment exclusion zones.<br><br>**CRDR 4.13-1** All construction activities and haul truck deliveries shall adhere to Section 2.i of Riverside County Ordinance No. 847, which prohibits construction activities that make loud noise from occurring between 6:00 p.m. and 6:00 a.m. during the months of June through September, and between 6:00 p.m. and 7:00 a.m. during the months of October through May, and on Sundays and Federal holidays. | Project Applicant, Construction Contractors/ Building and Safety Department<br><br>Project Applicant, Construction Contractors/ Building and Safety Department | Prior to issuance of grading or building permits<br><br>During construction activities |
| **4.14 Paleontological Resources** | | | | |
| **Threshold a.:** The Project would not impact any known paleontological resources or unique geological features, as no such resources were identified based on records searches and field surveys conducted at the Project site. However, portions of the Project site and off-site improvement areas are underlain by very old sandy alluvial channel/valley deposits ("Qvoaa" and "Qvova"), which are assigned a "High" sensitivity for paleontological resources. Therefore, ground disturbing activities associated | Less than Significant with Mitigation Incorporated | **MM 4.14-1** Prior to the issuance of grading permits, the County shall condition proposed grading permits to require implementation of the Project's Paleontological Resource Impact Monitoring Program (PRIMP), which is included as Technical Appendix K to the Project's EIR. Provided below is a summary of the requirements identified by the PRIMP:<br>1. All mass grading, excavation, drilling, and trenching activities within undisturbed Pleistocene very old sandy alluvial channel deposits at the on-site portion of the Project, starting at the surface, shall be monitored full-time for paleontological resources by a Riverside County-qualified | Project Applicant, Project Paleontologist/ County Geologist, Planning Department | Prior to the issuance of grading permits and during grading and ground-disturbing activities |

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| with Project grading and excavation could directly or indirectly destroy previously undiscovered paleontological resources. Accordingly, the Project would result in a significant impact to paleontological resources on both a direct and cumulatively considerable basis prior to mitigation. Implementation of Mitigation Measure MM 4.14-1 would ensure that a Paleontological Resource Impact Mitigation Program (PRIMP) is implemented during future site grading and ground-disturbing activities. Implementation of the Project's PRIMP would ensure that paleontological resources, if uncovered during site grading activities, are appropriately treated, and would reduce the Project's direct and cumulatively-considerable impacts to paleontological resources to less-than-significant levels. | | paleontologist or a monitor supervised by a Riverside County-qualified paleontologist (Paleontological Monitor). The duration of monitoring may be increased or decreased at the discretion of the Paleontological Monitor based on observations of the geology, stratigraphy, and/or the presence of fossils discovered by the Paleontological Monitor.<br>2. Prior to the initiation of any grading, drilling, and/or excavation activities, a preconstruction meeting shall be held and attended by the Paleontological Monitor, representatives of the grading contractor and subcontractors, the Project owner or developer, and a representative of the Lead Agency (Riverside County). The nature of potential paleontological resources shall be discussed, as well as the protocol that is to be implemented following discovery of any fossiliferous materials.<br>3. In the field, the Paleontological Monitor shall be the responsible persons onsite with the assigned authority and responsibility to oversee all grading operations that might adversely affect any salvage efforts.<br>4. Any identified fossils shall be collected and placed in cardboard flats or plastic buckets and identified by field number, collector, and date collected. Notes shall be taken on the map location and stratigraphy of the site, and the site shall be photographed before it is vacated and the fossils are removed to a safe place.<br>5. During mass grading, any discovered fossil site shall be protected by red flagging to prevent it from being overrun by earthmovers (scrapers) before salvage begins. All grading activities within 50 feet of the discovery site shall be suspended until fossil recovery has been completed.<br>6. If the site involves a large terrestrial vertebrate, for example, large bone(s) or a mammoth tusk, that is/are too large to be easily removed by a single monitor, a field crew shall be sent | | |

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| | | to the site to excavate around the find, encase the discovery within a plaster jacket, and remove it after the plaster has set. For large fossils, use of the contractor's construction equipment shall be solicited to remove the jacket to a safe location before it is returned to an appropriate laboratory facility.<br>7. In the event that fossils are found by construction workers when the Paleontological Monitor is not on-site or is occupied elsewhere, all work shall be halted within 50 feet of the discovery location until it can be properly evaluated by the Paleontological Monitor.<br>8. Sediments containing small invertebrate and/or vertebrate fossils also shall be collected as discussed below. When vertebrate fossil remains are recovered, additional sediment samples shall be taken from the same location to process for micro-vertebrate specimens.<br>9. Isolated fossils shall be collected by hand, wrapped in paper, and placed in temporary collecting flats or five-gallon buckets. Notes shall be taken on the map location and stratigraphy of the site, and the site shall be photographed before it is vacated and the fossils are removed to a safe place. As small invertebrate fossils typically represent multiple specimens of a limited number of organisms, a scientifically-suitable sample shall be obtained from one to several five-gallon buckets of fossiliferous sediment. If it is possible to dry-screen the sediment in the field, a concentrated sample shall consist of one or two buckets of material. For micro-vertebrate fossils, the standard test is usually the observed presence of small pieces of bone within the sediments. If bone is present, as many as 20 to 40 five gallon buckets of sediment shall be collected and returned to a separate facility to wet screen the sediment. If, after five buckets have been wet-screened and have failed to yield any micro-vertebrate or other fossil material under microscopic | | |

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| | | examination, then this process can be terminated. In the laboratory, any recovered fossils shall be cleaned of extraneous matrix, any breaks repaired, and the specimen, if necessary, shall be stabilized by soaking in an archivally approved acrylic hardener (e.g., a solution of acetone and Paraloid B-72).<br>10. Fossils shall be identified by an adjunct invertebrate or vertebrate paleontology specialist, depending on the group of fossils needing identification (e.g., mollusks, reptiles, birds, mammals, or fish). Standard museum curation steps shall be utilized by, or under the direct supervision of, the principal investigator, who has a minimum nine years of paleontological curatorial experience. Curation steps shall include cleaning, preparing, sorting, identifying, painting, numbering, and labeling all specimens before submittal to the receiving institution.<br>11. Pursuant to the County of Riverside's "SABER" Policy, paleontological materials (fossils) found in Riverside County shall be directed to the Western Science Center on Searl Road in Hemet, Riverside County, California, unless otherwise directed by the County Geologist. A written agreement between the Project developer and the preferred archival institution shall be in place prior to commencement of grading activities. The Project owner/developer shall assume financial responsibility for any institutional curation fees for the Project.<br>12. Prior to final grading inspection, a final written report shall be produced by an approved Riverside County paleontologist, and submitted to the County of Riverside Geologist at the conclusion of grading activities for the Project. The report shall include sections on general background information, previous studies (both geologic and palaeontologic), results of findings and analysis, discussion of all recovered fossils, and a fossil list identified to the lowest taxonomic level | | |

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| | | possible, as well as a list of references cited and index and locality maps and graphics to show the locations of all fossil localities, etc. A letter documenting receipt and acceptance of the fossil collections by the receiving institution shall be included in the final report, a copy of which shall be archived with the fossil collection. If fossils are not recovered during the project, the final report shall be in a shortened letter format. | | |
| **4.15 Population and Housing** | | | | |
| **Threshold a.:** The Project site does not contain any existing residents or housing, and the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. No impact would occur. | No Impact | No significant environmental impacts related to population and housing would occur due to the Project. No mitigation measures are required. | N/A | N/A |
| **Threshold b.:** The Project does not include any land uses, such as commercial retail or light industrial land uses, that would generate new employees or an increased demand for additional housing. Rather, the Project would accommodate a total of 694 dwelling units on site, including 310 HDR dwelling units (of which 80 would be age restricted). The Project's proposed HDR dwelling units would provide for affordable housing, as the HDR land use designation represents one of the more affordable categories of housing under the General Plan Land Use Element. Furthermore, the Riverside County General Plan designates areas of the County in which lower-income housing can be accommodated to meet the County's RHNA obligations, and does not rely on residential development on the Project site in order to meet its RHNA obligations. The Project would have no | No Impact | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| effect on the portions of the County that are planned to accommodate housing for lower-income households. Therefore, the Project would not create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income, and no impact would occur.<br><br>**Threshold c.:** The adopted SP 380 land uses would result in a future site population of approximately 1,814 persons, while the land uses proposed as part of the Project would result in a future site population of approximately 2,115 persons, representing a net increase in the site's anticipated population of approximately 301 persons. This increase would not represent substantial unplanned population growth, as the Project site is already designated for residential development under the County's General Plan, SWAP, and the adopted SP 380, and represents a negligible fraction of the population growth already forecast for the region. Additionally, the Project's proposed roadway and other infrastructure (e.g., water, sewer, etc.) improvements have been designed and sized to serve the proposed Project, and would not indirectly induce growth in the local area. Furthermore, the increase in population associated with the proposed Project has been addressed under the relevant issue areas identified throughout this EIR (e.g., public services, recreation, transportation and traffic, etc.). Under each of these topics, Project-related impacts are determined to be less than | Less than Significant | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| significant, or mitigation measures have been imposed to reduce impacts to the maximum feasible extent. There are no components of the Project's population increase that have not already been addressed and accounted for throughout this EIR for the Project site. Thus, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly, and impacts would be less than significant. | | | | |
| **4.16 Public Services** | | | | |
| **Threshold a.:** With payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Fire Department would be reduced to less-than-significant levels, and the Project would not result in or require the construction of new fire protection facilities that could result in a significant impact to the environment. | Less than Significant | **CRDR 4.16-1** As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety. Among other items, these requirements include conformance with the Uniform Building Code Section 1503, which requires that all buildings be constructed with fire retardant roofing material, as well as standard Riverside County Fire Department conditions of approval (COAs) for specific plans, which prohibit flag lots and require alternative/secondary access routes to neighborhoods. The alternative/secondary access routes would be required to be maintained throughout construction and buildout of the proposed Project. | Project Applicant/ Building and Safety Department | Prior to issuance of building permits and prior to final building inspection |
| **Threshold b.:** With payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Sheriff's Department would be reduced to less-than-significant levels, and the Project would not result in or require the construction of new police protection facilities that could result in a significant impact to the environment. | Less than Significant | **CRDR 4.16-2** The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for fire protection facilities (including fire stations), sheriff protection facilities (including sheriff stations), library facilities, and health facilities. | As set forth by Ordinance No. 659 | As set forth by Ordinance No. 659 |
| **Threshold c.:** The Project would generate approximately 269 students based on applicable student generation rates. Although the Menifee | Less than Significant | **CRDR 4.16-3** The Project is required to comply with Riverside County Ordinance No. 575, which requires mandatory payment of school impact fees pursuant to Public Education Code § | As set forth by Ordinance No. 575 | As set forth by Ordinance No. 575 |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| Union School District (MUSD) and Perris Union High School District (PUHSD) may need to construct new school facilities to meet growing demand within this part of Riverside County, the payment of mandatory school impact fees would ensure that the Project does not result in significant direct or cumulatively considerable impacts to the ability of MUSD and/or PUHSD to provide adequate school services. As such, Project impacts would be less than significant. | | 17072.10-18.<br><br>**CRDR 4.16-4** The Project is required to comply with Riverside County Ordinance No. 787, which adopts the California Fire Code and adds requirements that help ensure that buildings have adequate emergency access for fire safety personnel, equipment and apparatus, and do not hinder evacuation from fire, including potential blockage of stairways or fire doors. | As set forth by Ordinance No. 787 | As set forth by Ordinance No. 787 |
| **Threshold d.:** Although the Project would contribute to a need for new or expanded library facilities, the Project would be required to contribute DIF fees, which would be used in part to provide for library space and/or new book volumes. Accordingly, with payment of DIF fees, Project impacts to library services and facilities are evaluated as less than significant on both a direct and cumulatively-considerable basis. | Less than Significant | | | |
| **Threshold e.:** With payment of mandatory DIF fees, the Project would result in less-than-significant direct and cumulatively-considerable impacts to health services facilities, and the Project would not result in or require the construction of new health services facilities that could result in a significant impact to the environment. | Less than Significant | | | |
| **4.17 Recreation** | | | | |
| **Thresholds a. and d.:** The physical construction of the on-site recreational facilities has been addressed under the relevant issue areas identified throughout this EIR (e.g., air quality, | Less than Significant | **CRDR 4.17-1** The Project would be required to comply with Section 10.35 (Park and Recreation Fees and Dedications) of Riverside County Ordinance No. 460, which specifies in-lieu fees for parkland dedication. Pursuant to Section I.7.a.of Section | Project Applicant/Planning Department, VWRPD | Prior to final building inspection |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| biological resources, cultural resources). Under each of these topics, Project impacts are determined to be less than significant, or mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no components of the planned recreational facilities on site that have not already been addressed and accounted for throughout this EIR. Accordingly, Project impacts due to parkland development on site would be less than significant, requiring no mitigation beyond that which is identified in other portions of this EIR.<br><br>**Threshold b. and c.:** As calculated based on the VWRPD Master Plan, the Project would generate a future population of approximately 2,211 residents, which would result in a demand for 11.07 acres of parkland. The Project accommodates a total of 8.88 acres of recreational uses (park) on site; thus, the Project would fall short of the VWRPD Master Plan standard of 5.0 acres of parkland per 1,000 residents by approximately 2.19 acres. However, the Project's proposed 8.88 acres of OS-R land uses would meet the recreational demands for approximately 526 of the Project's 694 total dwelling units. Pursuant to the VWRPD Master Plan and Riverside County Ordinance No. 460, the Project Applicant would be required to contribute in-lieu fees for the remaining +/- 168 dwelling units for which adequate parkland is not accommodated on site. With mandatory payment of in-lieu park fees for the Project's deficit of approximately 2.19-acre of parkland pursuant to | Less than Significant | 10.35 of Ordinance No. 460, payment of in-lieu fees "…shall be based either on the fair market value of the land which would otherwise be required or on a fixed in-lieu fee rate set forth in the approved [Community Parks and Recreation] Plan." The Project is located within a portion of the County for which a Community Parks and Recreation Plan has been adopted (i.e., the VWRPD Master Plan). Table 3 (In-Lieu Fees per Unit) of Appendix E to the VWRPD Master Plan (Quimby Park – In-Lieu Fee Report) specifies a per-unit fee for single family and multifamily dwelling units. Because the 8.88 acres of on-site parkland would be adequate to meet the demand of 575 of the Project's 694 total dwelling units, the Project Applicant would be required to pay the multi-family in-lieu fee specified by Table 3 of Appendix E to the VWRPD Master Plan for the 119 multi-family dwelling units for which adequate parkland would not be accommodate on site. The actual number of units for which in-lieu fees would be required shall be calculated at the time of building permits, as there is a potential that a portion of the Project's parkland demand could be met through recreational amenities within proposed multi-family Planning Area 5 of Specific Plan No. 380, Amendment No. 1. | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| the VWRPD Master Plan and Riverside County Ordinance No. 460, the Project's impacts due to substantial physical deterioration of the park facilities would be reduced to less-than-significant levels. In addition, mandatory payment of fees pursuant to Riverside County Ordinance No. 460 and based upon the rates specified by the VWRPD Master Plan would ensure that the Project fully complies with both the VWRPD Master Plan and Riverside County Ordinance No. 460. Therefore, with mandatory payment of fees, Project impacts to existing parkland facilities off site and due to a conflict with a community parks and recreation plan would be reduced to less-than-significant levels. | | | | |
| **4.18 Transportation** | | | | |
| **Threshold a.:** The proposed Project would be consistent with or otherwise would not conflict with the goals, policies, and/or requirements of the SCAG 2024-2050 RTP/SCS, the Riverside County CMP, the Riverside County General Plan Circulation Element, and all applicable County ordinances that address the circulation system. Accordingly, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, and impacts would be less than significant. | Less than Significant | **MM 4.18-1** Prior to the issuance of grading permits or improvement plans affecting public roadways, the Project Applicant shall prepare and Riverside County shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices (CMUTCD). A requirement to comply with the temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors. | Project Applicant, Project Traffic Engineer/ Transportation Department, Planning Department | Prior to issuance of grading permits or improvement plans affecting roadways |
| **Threshold b.:** Buildout of the residential uses proposed as part of the Project would result in a VMT per capita of 32.2, which exceeds the County's VMT per capita threshold of significance of 15.2 by approximately 211.8 percent. In addition, the cumulative Project-generated VMT | Significant and Unavoidable | **CRDR 4.18-1** Prior to issuance of building permits, the Project Applicant shall pay appropriate Development Impact Fee Program (DIF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 659.<br><br>**CRDR 4.18-2** Prior to final building inspection, the Project Applicant shall pay appropriate Western Riverside County | Project Applicant/ Planning Department<br><br>Project Applicant/ Planning | Prior to issuance of building permits<br><br>Prior to final building inspection |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| per capita would be approximately 32.2, which would exceed the County's impact threshold of 15.2 by approximately 183.6%. As such, prior to mitigation, the proposed Project would result in a significant direct and cumulatively considerable impact related to VMT. A 52.8% reduction in Project-generated HB VMT would be needed to achieve a less than significant impact under Project conditions, and a reduction in Project-generated VMT of 45.5% would be needed to reduce the cumulative plus Project VMT to below the County's threshold of 15.2. However, due to the scale of application and location of the Project, the addition of design features would likely result in a modest decrease (under 5%) in VMT and be unable to reduce Project-generated VMT below the County's impact threshold. Accordingly, because the Project would not meet any of the County Guidelines screening criteria, and because the PA HB VMT per capita would exceed the County's VMT impact threshold for both baseline and cumulative conditions, even with the inclusion of feasible design features intended to reduce project-generated VMT, Project impacts due to VMT represent a significant and unavoidable impact for which mitigation is not available. | | Transportation Uniform Mitigation Fee Program Ordinance (TUMF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 824.<br><br>**CRDR 4.18-3** Prior to final building inspection for each phase of the proposed Project, the Project Applicant shall construct the improvements identified in Table 1-3 of the Project's Traffic Analysis (Technical Appendix L2 to this EIR).<br><br>**CRDR 4.18-4** Prior to final building inspection for each phase of the proposed Project, the Project Applicant shall make fair-share contributions towards required transportation improvements, in accordance with Table 1-3 of the Project's Traffic Analysis (Technical Appendix L2 to this EIR). | Department<br><br>Project Applicant/ Planning Department<br><br>Project Applicant/ Planning Department | <br><br>Prior to final building inspection<br><br>Prior to final building inspection |
| **Threshold c.:** The Project would not substantially increase hazards due to a geometric design feature or due to incompatible land uses. Impacts would be less than significant. | Less than Significant | | | |
| **Threshold d.:** Although the Project would result in | Less than | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| the increased maintenance of roadways and would increase traffic on existing and planned roadways, any incremental increase in the need to maintain public roadway facilities would be offset by tax revenue generated by the Project's proposed land uses. There are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, Project impacts would be less than significant. | Significant | | | |
| **Threshold e.:** The Project has the potential to adversely impact circulation in the local area during the construction of Keller Road through the Project site, and during construction of frontage improvements along Winchester Road. The Project's potential impacts to circulation along Keller Road and/or Winchester Road during construction is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan for implementing developments affecting Keller Road or Winchester Road. Mitigation Measure MM 4.18-1 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits or improvement plans affecting public roadways. Implementation of the required mitigation would ensure that Project-related construction activities would not substantially affect circulation during the Project's construction. With implementation of the required | Less than Significant with Mitigation | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| mitigation, impacts would be reduced to less-than-significant levels.<br><br>**Threshold f.:** During proposed improvements to Keller Road along the Project frontage, there is a potential that the Project could adversely affect emergency access or access to nearby uses. This is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan for implementing developments. Mitigation Measure MM 4.18-1 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits. With implementation of the required mitigation, the Project would not result in inadequate emergency access or access to nearby uses during the Project's construction phase. Accordingly, with implementation of the required mitigation, impacts would be reduced to less-than-significant levels.<br><br>**Threshold g.:** No construction or expansion of facilities for bicycles is proposed as part of the Project, aside from bicycle facilities that could be accommodated along Keller Road, Winchester Road, and along on-site roadways. Impacts associated with proposed improvements to roadways have been evaluated throughout this EIR, and impacts were determined to be less than significant or would be reduced to the maximum feasible extent with the incorporation of mitigation measures. | Less than Significant with Mitigation<br><br>Less-than-Significant Impact | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| **4.19 Tribal Cultural Resources** | | | | |
| **Threshold a.:** Although no specific Tribal Cultural Resources were identified, the Project would be subject to compliance with EIR Mitigation Measures MM 4.5-1 through MM 4.5-8, which were identified to address the Project's potential impacts to historical resources. In particular, Mitigation Measure MM 4.5-1 requires the Project Applicant to retain a qualified archaeologist to monitor site grading, while Mitigation Measure MM 4.5-2 requires full-time monitoring of Project grading activities by a Native American monitor. Mandatory compliance with EIR Mitigation Measures MM 4.5-1 through MM 4.5-8 would ensure that Project impacts to tribal cultural resources would be less than significant. | Less than Significant with Mitigation Incorporated | Mitigation Measures MM 4.5-1 through MM 4.5-8 shall apply (refer to EIR Subsection 4.5, Cultural Resources). The mitigation measures included in EIR Subsection 4.5 have been drafted to include all of the mitigation requirements requested during the Project's Tribal Consultation process. No additional mitigation measures are required.<br><br>**CRDR 4.19-1** Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code Section 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code Section 6254 (r).<br><br>**CRDR 4.19-2** 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). | Refer to MM 4.5-1 through MM 4.5-8 above.<br><br>Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department<br><br>Project Applicant, Project Archaeologist/ County Archaeologist, Planning Department, NAHC, County Coroner | Refer to MM 4.5-1 through MM 4.5-8 above.<br><br>In the event Native American human remains or associated grave goods are discovered on site<br><br>In the event that human remains are discovered during grading activities |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| | | 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. | | |
| **4.20 Utilities and Service Systems** | | | | |
| **Threshold a.:** Although the Project would require construction of new or expanded water, wastewater conveyance, and storm water 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. As such, with the mitigation measures specified in this EIR, Project impacts due to water, sewer, and drainage improvements would be less than significant. Additionally, the Project's wastewater generation would represent approximately 1.8% of the Temecula Valley RWRF's current excess capacity, and would | Less than Significant | **CRDR 4.20-1** The Project is required to comply with the provisions of the California Solid Waste Integrated Waste Management Act, (AB 939, 1989) which mandates a reduction of disposed waste throughout California.<br><br>**CRDR 4.20-2** 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. This Act 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.<br><br>**CRDR 4.20-3** 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 | As set forth by AB 939<br><br>As set forth by AB 1327<br><br>As set forth by AB 341 | As set forth by AB 939<br><br>As set forth by AB 1327<br><br>As set forth by AB 341 |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| represent 1.1% of the ultimate planned excess capacity. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Temecula Valley RWRF, and impacts would therefore be less than significant. | | required the 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. | | |
| **Threshold b.:** Based on present information and the assurance that MWD is engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, EMWD has determined that it will be able to provide adequate water supplies to meet the potable water demand for the proposed Project as part of its existing and future demands. (EMWD, 2021d) Accordingly, sufficient water supplies are available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Furthermore, the use of recycled water on-site would serve to further reduce the Project's water demand. The Project's effect on EMWD's regional water network would be less than significant. | Less than Significant | **CRDR 4.20-4** The Project would be subject to the following applicable standard conditions of approval imposed on the Project by the RCDWR:<br>• 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 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. Arrangements can be made through the franchise hauler.<br>• 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. | Project Applicant/ RCDWR | Project Applicant/ RCDWR |
| **Thresholds c. and d.:** Impacts associated with the Project's proposed sewer 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 | Less than Significant | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| environmental impacts that would occur specifically related to the Project's proposed sewer improvements. As such, with the mitigation measures specified in this EIR, Project impacts due to proposed sewer improvements would be less than significant. Additionally, the Project's wastewater generation would represent approximately 1.8% of the Temecula Valley RWRF's current excess capacity, and would represent 1.1% of the ultimate planned excess capacity. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Temecula Valley RWRF, and impacts would therefore be less than significant. | | Receipts must clearly identify the amount of waste disposed and Construction and Demolition (C&D) materials recycled.<br>• 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. | | |
| **Threshold e.:** Regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project's construction and operational phases. The Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Accordingly, impacts would be less than significant. | Less than Significant | | | |
| **Threshold f.:** With mandatory compliance to AB 939, AB 341, and RCDWR's programs and policies, the Project would not result in a significant impact due to noncompliance with regulations related to solid waste. A less-than-significant impact would occur. | Less than Significant | | | |
| **Threshold g.:** Impacts associated with the construction or expansion of utility facilities would | Less than Significant | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required. | | | | |
| **4.21 Wildfire** | | | | |
| **Threshold a.:** The Project site and surrounding areas are not designated as emergency evacuation routes, and there are no adopted emergency response or evacuation plans specific to the Project area. During both construction and full buildout, the Project would be required to maintain adequate emergency vehicle access consistent with County and CalFire requirements. Therefore, the Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant. | Less than Significant | **CRDR 4.21-1** Future implementing developments within the Project site (e.g., plot plans, building permits, etc.) shall be reviewed by Riverside County for compliance with the fire protection measures included in Section 2.H, Fuel Modification Plan, of SP 380A1. | Project Applicant/ Building and Safety Department, Planning Department, Riverside County Fire Department | Prior to approval of future implementing developments (e.g., plot plans, building permits, etc.) |
| **Thresholds b. and e.:** The Project would be subject to the fire protection requirements set forth in Chapter 2 of proposed SP 380A1 and detailed in the Project's March 2025 Fire Protection Plan (Technical Appendix N), including the provision of 100-foot-wide Fuel Modification Zones (FMZs) where feasible, and enhanced fire protection measures for specific lots where the | Less than Significant | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| full FMZ cannot be achieved. With mandatory compliance with these requirements, including defensible space, roadside fuel treatments, and ignition-resistant construction, the Project would not exacerbate wildfire risks, would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of fire, and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. The Project also would accommodate adequate circulation features to allow for site evacuation in the event of a wildfire. Impacts would be less than significant. | | | | |
| **Threshold c.:** Areas proposed for fuel modification occur entirely within the Project's development footprint, including manufactured slopes, landscaped corridors, and parkways. Environmental impacts associated with fuel modification areas have been fully evaluated under the applicable subject areas of this EIR (e.g., biological and cultural resources), and mitigation measures have been provided where necessary to reduce impacts to a less-than-significant level. There are no components of the Project's fire protection infrastructure that would result in new or unanalyzed environmental impacts. As such, the Project would not exacerbate fire risk nor result in environmental impacts beyond those already disclosed in this EIR. Impacts would be less than significant. | Less than Significant | | | |
| **Threshold d.:** Although extreme wildfire conditions could still occur in the region, the | Less than Significant | | | |

| Potential Environmental Impact | Significance Determination | Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR) | Responsible/ Monitoring Parties | Implementation Stage |
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| Project includes enhanced fire-resistant construction features and fuel modification measures as required by SP 380A1 and the Fire Protection Plan, which would reduce on-site wildfire risk to less-than-significant levels. In addition, the Project site's gentle topography and proposed drainage infrastructure, including detention basins and stormwater controls, would prevent post-fire runoff from causing downstream flooding or erosion. The Project site is not susceptible to landslides, including those that could be triggered by post-fire slope instability. Therefore, the Project would not expose people or structures to significant risks associated with wildfire-related geologic or hydrologic hazards. Impacts would be less than significant. | | | | |

# 1.0 INTRODUCTION

This Draft Environmental Impact Report ("Draft EIR" or "EIR") is an informational document that represents the independent judgement of the County of Riverside acting as the Lead Agency pursuant to the California Environmental Quality Act ("CEQA"), and evaluates the physical environmental effects that could result from construction and operation of the proposed Keller Crossing Specific Plan No. 380, Amendment No. 1 Project (hereinafter the "Project"). Discretionary and other related ministerial actions that are required to construct and operate the Project are also described in this EIR.

When the term "Project" is used in this EIR with the initial letter capitalized, the term shall mean all aspects of the planning, construction, and operation of the Keller Crossing Specific Plan No. 380, Amendment No. 1 Project, including all discretionary and administrative approvals and permits required for its implementation. When the term "Project Applicant" or "Applicant" are used with the initial letters capitalized, the terms shall mean D.R. Horton, Los Angeles Holding Company, which is the entity that submitted applications for the Project as proposed and as evaluated in this EIR.

## 1.1 PURPOSES OF CEQA AND THIS DRAFT EIR

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

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

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

Under CEQA, if a Lead Agency determines that there is substantial evidence in light of the whole record that a project may have a significant effect on the environment, the agency must prepare an Environmental

Impact Report (EIR) (State CEQA Guidelines Section 15064(a)(1)). The purpose of an EIR is to inform public agency decision-makers and the public of the potentially significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project (State CEQA Guidelines Section 15121(a)).

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

1. Adoption by resolution of a General Plan Amendment (GPA210004);
2. Adoption by resolution of Amendment No. 1 to the Keller Crossing Specific Plan No. 380 (SP00380A01);
3. Adoption by ordinance of a Change of Zone (CZ2100012); and
4. Adoption by resolution of Tentative Tract Map No. 38163 (TTM38163)

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

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

Accordingly, and in conformance with State CEQA Guidelines Section 15121(a), the purposes of this EIR are to: (1) disclose information by informing public agency decision makers and the public generally of the significant environmental effects associated with all phases of the Project; (2) identify possible ways to

minimize or avoid those significant effects; and (3) to describe a reasonable range of alternatives to the Project that would feasibly attain most of the basic Project objectives but would avoid or substantially lessen its significant environmental effects.

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

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

- **The Planning Commission:** The Planning Commission will recommend to the Board of Supervisors whether the Project's applications, which include GPA210004, SP00380A01, CZ2100012, and TTM38163 should be approved, modified, or denied, and will recommend to the Board of Supervisors whether to certify the Final EIR (FEIR) with or without modifications.

- **Board of Supervisors:** The Board of Supervisors will decide whether to approve, modify, or deny GPA210004, SP00380A01, CZ2100012, and TTM38163. Project-related approvals will be subject to a noticed public hearing held before the Board of Supervisors. Upon approval or conditional approval of the Project and certification of this EIR by the Board of Supervisors, the County would conduct additional discretionary and administrative level reviews as needed to implement the Project.

This EIR and all supporting technical appendices are available at the County of Riverside Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501 during the County's regular business hours, or can be requested in electronic form by contacting the County Planning Department.

## 1.2 PROJECT BACKGROUND

On November 3, 2013, the Riverside County Board of Supervisors approved the Keller Crossing Specific Plan No. 380 (herein, "SP 380") along with General Plan Amendment (GPA) No. 951 and Change of Zone (CZ) No. 7723. Concurrent with its approval of the SP 380, GPA 951, and CZ 7723, the Board of Supervisors also certified the Keller Crossing Final EIR (State Clearinghouse [SCH] No. 2010011068). The original SP 380 project included a mix of residential and commercial uses on 201.1 acres, including 22 low-density residential units, 73 medium-density residential units, a 21.6-acre mixed-use planning area that accommodated 225 dwelling units, up to 650,000 square feet (s.f.) of commercial uses, and approximately 61.1 acres of "Open Space – Conservation (OS-C)" land uses. The Keller Crossing Final EIR identified

significant and unavoidable impacts under the issue areas of aesthetics and air quality, and adopted a Statement of Overriding Considerations in accordance with Section 15093 of the State CEQA Guidelines.

In March 2021, the Project Applicant filed applications for the first amendment to the Keller Crossing Specific Plan No. 380 (SP00380A01; herein referred to as "SP 380A1"), a General Plan Amendment (GPA210004), a Change of Zone (CZ2100012), and a Tentative Tract Map (TTM38163), collectively referred to herein as the "Prior Project." Approval of the applications would have allowed for future development of the 196.1 acre Project with up to 176,000 square feet (s.f.) of "Commercial Retail (CR)" land uses on 17.7 acres, 280 "Medium-Density Residential (MDR)" dwelling units on 62.7 acres, 76 "Medium-High-Density Residential (MHDR)" dwelling units on 14.1 acres, 80 "High-Density Residential (HDR)" dwelling units that would be age qualified on 7.8 acres, 1.0 acre of "Community Development-Very Low Density Residential (CD-VLDR)" land uses, 9.5 acres of "Open Space-Recreation (OS-R)" land uses, 6.8 acres of "Open Space-Water (OS-W)" land uses, 61.1 acres of "Open Space-Conservation Habitat (OS-CH)" land uses, and 15.3 acres of major circulation facilities. On August 31, 2021, Riverside County published a Notice of Preparation (NOP) indicating that an EIR would be prepared for the Prior Project, held a publicly-noticed scoping meeting on September 27, 2021, and filed the NOP with the State Clearinghouse (SCH). A new SCH number was issued for the Prior Project, SCH No. 2021080570. Following consideration of public comments on the NOP, a Draft EIR was prepared, which was circulated for a 45-day public review period that started on September 22, 2022 and concluded on November 7, 2022.

Prior to completion of the Final EIR for the Prior Project, the Project Applicant determined that the previously-proposed land uses were not feasible to implement based on financial considerations. As a result, the Project Applicant filed revised applications for the proposed SP00380A01, GPA210004, CZ2100012, and TTM38163 (collectively referred to herein as the "Project" or "proposed Project"). The revisions to these applications resulted in the elimination of the previously-proposed 17.7 acres of CR land uses, and the reconfiguration of the site design to accommodate 77 MDR dwelling units on 16.03 acres, 307 MHDR dwelling units on 44.63 acres, 310 HDR dwelling units on 26.71 acres (inclusive of 80 Age-Qualified VHR units on 7.32 acres), an 8.88-acre public park (OS-R), 3.49 acres of manufactured slopes (Open Space-Conservation [OS-C]), 16.00 acres of drainage/water quality features (OS-W), 61.42 acres designated OS-CH for Multiple Species Habitat Conservation Plan (MSHCP) conservation purposes, 18.89 acres of major roadways, and the dedication of 1.29 acres of public rights-of-way for Pourroy Road (0.99-acre) and Winchester Road (0.30-acre). On April 3, 2025, Riverside County recirculated the Project's NOP for a 30-day public review period in order to disclose that the design for the Project site had been changed and to afford the public the opportunity to comment on the potential environmental effects that may result from the newly-proposed land uses. During the 30-day public review period, a publicly-noticed scoping meeting was held at Riverside County Administrative Building on April 21, 2025.

## 1.3 SUMMARY OF THE PROJECT EVALUATED BY THIS EIR

The County of Riverside is the Lead Agency for the proposed Project, under whose authority this EIR has been prepared. For purposes of this EIR, the term "Project" refers to the Project's discretionary applications (GPA210004, SP00380A01, CZ2100012, and TTM38163) and the discretionary actions required to implement

the Project, as proposed, and all of the activities associated with Project implementation including planning, construction, and long-term operations.

Collectively, the approval of these discretionary actions would allow for the development of 694 residential dwelling units on approximately 87.37 acres, the establishment of approximately 8.88 acres of public and recreational open space, the construction of three water quality/detention basins on approximately 16.00 acres, and the preservation of approximately 61.42 acres of conserved open space for habitat protection. Specifically, the Project Applicant is requesting the following governmental approvals from the County of Riverside to implement the Project (refer to Chapter 3.0, *Project Description*, for a complete description of the Project's construction and operational characteristics):

- **General Plan Amendment No. 210004 (GPA210004):** The Project Applicant is requesting approval of a General Plan Amendment to update the land use designations within the Riverside County General Plan and the Southwest Area Plan (SWAP) land use designations to reflect the land uses proposed as part of the Project. Specifically, as part of GPA210004, the 196.1-acre Project site would be redesignated for MDR land uses on 16.03 acres, MHDR land uses on 44.63 acres, HDR land uses on 26.71 acres, OS-R land uses on 8.88 acres, OS-W land uses on 16.00 acres, OS-CH uses on 61.42 acres, OS-R land uses on 3.49 acres, along with 18.89 acres of land reserved for circulation infrastructure.

- **Change of Zone No. 2100012 (CZ2100012):** The Riverside County Zoning Ordinance (Ordinance No. 348), which is part of the County's Municipal Code, assigns a zoning classification to all properties in the County boundaries. All development within the County is required, by law, to comply with the provisions of the Zoning Ordinance. Under existing conditions, the Project site is zoned for "Specific Plan Zone (SP Zone)," indicating that zoning for the property is as set forth by the zoning ordinance adopted in conjunction with the original 2013 Keller Crossing Specific Plan No. 380 (SP 380). A Change of Zone (CZ No. 2100012) is proposed as part of the Project, which would amend the Specific Plan Zoning Ordinance to modify and establish the Planning Area boundaries, permitted uses, and development standards throughout the 196.1-acre Project site in order to reflect the land uses proposed as part of Amendment No. 1 to Specific Plan No. 380 (SP 380A1), as described below.

- **Amendment No. 1 to Specific Plan No. 380 (SP00380A01; also referred to herein as "SP 380A1"):** Amendment No. 1 to the Keller Crossing Specific Plan (SP 380A1) is a proposal to modify the configuration, acreages, unit counts, densities, and land use designations of all Planning Areas within the Keller Crossing Specific Plan No. 380. Additionally, SP 380A1 would reduce the overall project acreage by 5.05 acres from 201.1 acres to approximately 196.05 acres as a result of more accurate mapping. Specifically, proposed SPA 380A1 would make the following changes:

    - Eliminate the "Very Low Density Residential (VLDR)" and "Low Density Residential (LDR)"land uses categories previously approved for Planning Areas 1 and 4, respectively;
    - Accommodate five separate residential planning areas of varying density, including one MDR planning area on 16.03 acres (new Planning Area 1), two MHDR planning areas on 44.63 acres

(new Planning Areas 2 and 3), and two HDR planning areas on 26.71 acres (new Planning Areas 4 and 5);

- Increase the number of residential dwelling units allowed within the overall Specific Plan by 374 units, from 320 units to 694 units, thereby allowing for up to 77 MDR dwelling units, 307 MHDR dwelling units, and 310 HDR dwelling units;
- Eliminate the 37.8 acres and 400,000 s.f. of "Commercial Retail (CR)" land uses previously approved for Planning Areas 2 and 6;
- Establish an 8.88-acre public park (OS-R) in Planning Area 8;
- Establish two (2) OS-C Planning Areas (Planning Aras 6 and 7) on 3.49 acres, portions of which would serve as a land use buffer from existing residential uses to the west;
- Establish three (3) OS-W Planning Areas for drainage and water quality purposes on approximately 16.00 acres within Planning Areas 10, 11, and 12;
- Redesignate and expand the approved Planning Area 7 (referred to as Planning Area 9 under the proposed Project), revise the land use designation of this Planning Area from OS-C to OS-CH, and increase the acreage of planned conserved open space by 0.32-acre, from 61.1 acres to 61.42 acres; and
- Decrease areas proposed for backbone circulation from 20.6 acres to 18.89 acres.

The proposed SP 380A1 also would revise the approved development standards, permitted uses, and design guidelines to reflect the revised range of land uses proposed for the site.

- **Tentative Tract Map No. 38163:** Tentative Tract Map No. 38163 (herein, "TTM 38163") is a proposal subdivide the approximately 196.1-acre Project site to implement the land use plan proposed as part of SP 380A1. Specifically, TTM 38163 would subdivide the site into 384 single-family residential lots across proposed Planning Areas 1 through 3, 230 HDR fee simple lots in Planning Area 4, and 80 age-restricted HDR units in Planning Area 5. TTM 38163 also would establish one lot totaling approximately 8.88 acres for a community park; one lot for OS-CH land on approximately 61.42 acres; 5 lots for detention basin/water quality purposes on approximately 13.50 acres; and approximately 20.76 acres of OS-C land and Open Space lots. The remaining acreage would consist of internal and perimeter roadway improvements and associated right-of-way dedications.

## 1.4 CEQA Process Overview

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

When it is determined through preliminary review that a project may likely have one or more significant effects upon the environment, then an Environmental Impact Report (EIR) must be prepared. The "scope" of the EIR may be determined through preparation of an Initial Study and a public scoping process. The EIR should consider both the potential project-specific (direct and indirect) and cumulative environmental impacts that could result from the implementation of the proposed project.

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

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

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

In accordance with State CEQA Guidelines Section 15087, this Draft EIR will be made available for review by the public and public agencies for a minimum period of 45 days to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (State CEQA Guidelines Section 15204(a)). Responses to written comments received during the public review period will be included in the Final EIR. During the decision-making process, the Project and its design features, objectives, merits, environmental consequences, and socioeconomic factors, among other information contained in the Project's administrative record, will be considered by Riverside County decision-makers. If the Final EIR is certified and the Project approved, Riverside County and other public agencies with permitting authority over all, or portions, of the Project would be able to rely on the Final EIR as part of their permitting processes to evaluate the environmental effects of the Project as they pertain to the approval or denial of applicable permits.

## 1.5 EIR SCOPE, FORMAT, AND CONTENT

### 1.5.1 EIR Scope

#### *1. 2021 NOP and Scoping Process*

As previously summarized herein in Subsection 1.2, Riverside County originally circulated an NOP for the Prior Project on August 31, 2021, filed the NOP with the SCH, and held a publicly-noticed scoping meeting on September 27, 2021. During the public review period for the Prior Project's NOP and during the scoping meeting for the Prior Project, several comments were received by Riverside County related to the Prior Project's potential impacts to the environment. Comments received in conjunction with the Prior Project's NOP and scoping meeting are summarized below in Table 1-1, *Summary of 2021 NOP* Comments, while copies of the previous comment letters are included in *Technical Appendix A1*. Although the land use concept evaluated in the 2021 NOP was not approved or carried forward, relevant input received during this process was considered during preparation of this EIR.

**Table 1-1 Summary of 2021 NOP Comments**

| Commenter | Date | Comments | Location in EIR Where Comment(s) Addressed |
|---|---|---|---|
| Native American Heritage Commission (NAHC) | September 10, 2021 | • Project is subject to Native American Consultation pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18<br>• Prepare a cultural resources assessment to evaluate potential impacts to archaeological and historical resources | • Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources) |
| Department of California Highway Patrol (CHP) | September 21, 2021 | • Project is located in close proximity to State Route 79 (Winchester Road) which is a major arterial route<br>• Concerned Project could have a negative impact on CHP operations due to an increase in traffic, which could necessitate the need for additional traffic control measures to mitigate the potential increase in traffic collisions and calls for service | • Subsection 4.18 (Transportation) |
| South Coast Air Quality Management District (SCAQMD) | September 20, 2021 | • Requests an analysis of air quality impacts based on SCAQMD guidance<br>• Requests an analysis of consistency with the 2016 Air Quality Management Plan<br>• Requests mitigation measures and other features per the California Air Resources Board Air Quality and Land Use Handbook: A Community Health Perspective and the SCAQMD CEQA Air Quality Handbook | • Subsection 4.3 (Air Quality) and 4.8 (Greenhouse Gas Emissions) |

| Commenter | Date | Comments | Location in EIR Where Comment(s) Addressed |
|---|---|---|---|
| | | • Evaluate air quality emissions against the SCAQMD regional and localized thresholds for both construction and operations<br>• Identify feasible mitigation measures to address Project-related air quality impacts<br>• Identify alternatives to reduce or avoid air quality impacts | |
| Southern California Association of Governments (SCAG) | September 29, 2021 | • Requests an analysis of consistency with the goals listed in the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal)<br>• Requests review of the Final Program EIR for Connect SoCal for guidance as appropriate<br>• Recommends the incorporation of project-level performance standards-based mitigation measures in the PEIR to be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible | • Subsection 4.18 (Transportation) |
| Riverside County Department of Waste Resources | September 7, 2021 | • Build-out of the Project may have the potential to increase the amount of waste that could adversely affect solid waste facilities. The DEIR should include the projected maximum amount of waste generated from build-out of the Project, using appropriate waste generation factors for the proposed land uses<br>• Provides suggestions for consideration in order to meet the goals and standards of State legislation and regulations addressing solid waste.<br>• Provides suggestions for consideration in order to meet the goals and standards of State legislation and regulations addressing solid waste.<br>• Requests compliance with AB 1826 | • Subsection 4.20 (Utilities and Service Systems) |
| Riverside Transit Agency (RTA) | September 30, 2021 | • Interested in providing input on the commercial development plans when available<br>• Recommends adding a bus stop and crosswalk at Winchester and Keller Road | • Subsection 4.18 (Transportation) |

| Commenter | Date | Comments | Location in EIR Where Comment(s) Addressed |
|---|---|---|---|
| Endangered Habitats League (EHL) | August 30, 2021 | • Interested in MSHCP compliance<br>  ○ Requests notifications of future CEQA documents and hearings | • Subsection 4.4 (Biological Resources) |
| Andy Domenigoni, Domenigoni Barton Properties | September 9, 2021 | • Owners of SP 310 north of Keller Crossing project, concerned with the proposed density increase and its effects on traffic from Temecula to Winchester to Menifee to Hemet<br>  ○ Interested in how the project will address the Highway 79 policy area which requires a 9% reduction in traffic | • Subsection 4.18 (Transportation)<br>• Subsection 4.11 (Land Use and Planning) |
| Brian James, Resident | September 24, 2021 | • It appears there are only two access points to the project, with one of them ending up right in front resident's house. The additional traffic (noise and light pollution) is a concern.<br>• What is the proposed access to and from residents property?<br>• How will construction affect water well? | • Subsections 4.1 (Aesthetics), 4.13 (Noise), and 4.18 (Transportation)<br>• Subsection 4.18 (Transportation)<br>• Subsection 4.10 (Hydrology and Water Quality) |
| Zive Petrovski, Resident | September 27, 2021 | • Concerns regarding traffic.<br>• Concerned that water will seep through the surrounding lower elevation properties and cause adverse effects.<br>• Concern over well water quality and availability?<br>• Concern over air quality and water quality pollution.<br>• Concern over proximity of realigned Keller Road to existing residences.<br>• Concern over signage of Old Keller and whether it will remain a private road.<br>• Requests utility connections for existing residents south of the realigned Keller Road.<br>• Concerns over school capacity. | • Subsection 4.18 (Transportation)<br>• Subsections 4.3 (Air Quality) and 4.10 (Hydrology and Water Quality)<br>• Subsection 4.10 (Hydrology and Water Quality)<br>• Subsections 4.3 (Air Quality) and 4.10 (Hydrology and Water Quality)<br>• Subsection 4.18 (Transportation)<br>• Subsection 4.18 (Transportation)<br>• Subsection 4.20 (Utilities and Service Systems)<br>• Subsection 4.16 (Public Services) |

| Commenter | Date | Comments | Location in EIR Where Comment(s) Addressed |
|---|---|---|---|
| | | • Concerns of potential impacts to birds, coyotes, and other wildlife.<br>• Concerns over energy consumption and the provision of solar panels.<br>• Concerns over local air quality due to increase of traffic, as well as localized air quality health hazards.<br>• Requests local residents be kept up to date on the Project. | • Subsection 4.3 (Air Quality)<br>• Subsection 4.4 (Biological Resources)<br>• Subsection 4.4 (Air Quality)<br>• N/A |
| Zive Petrovski, Resident | September 28, 2021 | • Concerned over minimum lot sizes and if the Project is proposing to up-zone the site.<br>• Worried there is a massive deviation as to what is currently being presented vs what was put into record by Riverside County in Dec 2013.<br>• Believes the proposed project would not be an amendment to previous plans but should be treated as a new proposed plan with changes to zoning which need to allow public participation with the planning commission to discuss/agree/disagree with these changes. | • Section 3.0 (Project Description)<br>• Section 3.0 (Project Description) and Subsection 4.11 (Land Use and Planning)<br>• N/A |
| Dennis Tuffin, Resident | | • Concerns over proposed changes to land uses within the Project site.<br>• Traffic infrastructure and traffic patterns in the project area are not consistent or safe with the existing community conditions and/or county conditions and the proposed changes threaten the same<br>• Concerns over access and safety due to congestion and inadequate roads.<br>• Concerns over drainage, water, and flooding hazards and impacts to jurisdictional resources.<br>• Concern over damage to the aquifer and existing wells.<br>• Explosive blasting and environmental impacts from blasting including impacts on wells - the environmental impacts of these activities need to be closely evaluated.<br>• Requests review of traffic and congestion and adequacy of existing and planned infrastructure. | • Subsection 4.11 (Land Use and Planning)<br>• Subsection 4.18 (Transportation)<br>• Subsection 4.18 (Transportation)<br>• Subsections 4.10 (Hydrology and Water Quality) and 4.4 (Biological Resources)<br>• Subsection 4.10 (Hydrology and Water Quality<br>• Subsection 4.18 (Transportation) |

| Commenter | Date | Comments | Location in EIR Where Comment(s) Addressed |
|---|---|---|---|
| | | • Concerns regarding potential impacts associated with grading.<br>• Concerns over sludge and animal waste soil amendments on the Project site.<br>• Concerns over construction equipment and dust, erosion and noise control and abatement.<br>• Requests a bus stop along Highway 79 at Keller Road.<br>• Concerns over drought and climate change.<br>• Greenhouse Gases - All the concerns about Climate Change, Traffic Congestion, Drought and Access are effected by and in turn effect and exacerbate the production of Greenhouse Gases.<br>• Concerns over impacts to blue line streams and water courses and associated potential impacts associated with drainage, flooding, residential wells and safety.<br>• Concern over incompatibility of land uses, particularly with equestrian uses.<br>• Requests an analysis of alternative energy. | • Subsections 4.7 (Geology and Soils) and 4.10 (Hydrology and Water Quality)<br>• Subsection 4.9 (Hazards and Hazardous Materials)<br>• Subsections 4.3 (Air Quality) and 4.13 (Noise)<br>• Subsection 4.18 (Transportation)<br>• Subsections 4.8 (Greenhouse Gas Emissions) and 4.20 (Utilities and Service Systems)<br>• Subsections 4.4 (Biological Resources) and 4.10 (Hydrology and Water Quality)<br>• Subsection 4.11 (Land Use and Planning)<br>• Subsection 4.6 (Energy) |

### *2. 2025 Revised NOP and Scoping Process*

As also discussed herein in Subsection 1.2, prior to completion of the Final EIR for the Prior Project, the Project Applicant determined that the previously-proposed land uses were not feasible to implement based on financial considerations. As a result, the Project Applicant filed revised applications for the proposed SP00380A01, GPA210004, CZ2100012, and TTM38163 (collectively referred to herein as the "Project" or "proposed Project"). Due to the extent of changes proposed as part of the Project, on April 3, 2025, Riverside County recirculated the Project's NOP for a 30-day public review period in order to disclose that the design for the Project site had been changed and to afford the public the opportunity to comment on the potential environmental effects that may result from the newly-proposed land uses. The NOP was recirculated for public review to solicit responses to help the County identify the full scope and range of potential environmental concerns associated with the Project so that these issues could be fully examined in this EIR. Comments on the NOP were received from the following agencies and individuals:

- Endangered Habitats League (EHL)
- Riverside County Department of Waste Resources (RCDWR)
- Native American Heritage Commission (NAHC)
- California Department of Fish and Wildlife (CDFW)

- South Coast Air Quality Management District (SCAQMD)

In addition, a publicly-noticed EIR Scoping Meeting was held at the Riverside County Administrative Center, 1st Floor Conference Room 2A, located at 4080 Lemon Street, Riverside, California, 92501 on April 21, 2025, which provided members of the general public an additional opportunity to comment on the scope of environmental issues to be addressed in this EIR.

An Initial Study was not prepared for the proposed Project because the County determined that an EIR was clearly required. As such, this EIR evaluates all of the environmental topics identified in Appendix G to the State CEQA Guidelines and in the County's standard Environmental Assessment Checklist form. Based on Appendix G and the County's Environmental Assessment Checklist form, and in consideration of all comments received by Riverside County on the NOP and during the EIR Scoping Meeting, Section 4.0 of this EIR evaluates the Project's potential to cause adverse effects to the following environmental issue areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and 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

The Project's potential to result in growth-inducing impacts are discussed in Section 5.0, *Other CEQA Considerations*, of this EIR. The NOP, public review distribution list, and written comments received by the County during the 2025 NOP public review period are provided in *Technical Appendix A2* to this EIR. Please refer to Table 1-2, *Summary of 2025 NOP Comments*, for a summary of the comments received during NOP public review period and at the scoping meeting for the currently-proposed Project. Comments received during the 2025 NOP scoping period are summarized in Table 1-2, *Summary of 2025 NOP Comments*.

**Table 1-2 Summary of 2025 NOP Comments**

| Commenter | Date | Comments | Location in EIR Where Comment(s) Addressed |
|---|---|---|---|
| California Department of Fish and Wildlife (CDFW) | May 2, 2025 | • States that CDFW is a Trustee and Responsible Agency and may require permits under the Fish and Game Code<br>• Requests that the DEIR evaluate all | • Section 1.0 (Introduction) and Subsection 4.4 (Biological Resources)<br>• Subsection 4.4 (Biological |

| Commenter | Date | Comments | Location in EIR Where Comment(s) Addressed |
|---|---|---|---|
| | | Project activities, including impacts to jurisdictional aquatic resources and identify the type and extent of impacts that may require notification under Fish and Game Code section 1600 et seq. | Resources) |
| | | • Requests that the DEIR evaluate direct, indirect, and cumulative impacts to biological resources, including special-status species, sensitive communities, and wildlife movement. | • Subsection 4.4 (Biological Resources) |
| | | • Requests that DEIR should include appropriate and enforceable mitigation measures, including avoidance, minimization, restoration, and enhancement, with specific performance standards. | • Subsection 4.4 (Biological Resources) |
| | | • Recommends including measures for revegetation and landscaping with native species and avoiding the use of invasive plant species. | • Subsection 4.4 (Biological Resources) |
| | | • Encourages early consultation for potential Lake and Streambed Alteration Agreement (LSAA) needs. | • Section 1.0 (Introduction) and Subsection 4.4 (Biological Resources) |
| South Coast Air Quality Management District (SCAQMD) | May 2, 2025 | • Recommends using the South Coast AQMD's CEQA Air Quality Handbook and CalEEMod to quantify air quality and GHG emissions. | • Subsection 4.3 (Air Quality) and Subsection 4.8 (Greenhouse Gas Emissions) |
| | | • Recommends evaluating both regional and localized significance thresholds; if no thresholds are adopted by the Lead Agency, AQMD thresholds should be used. | • Subsection 4.3 (Air Quality) |
| | | • Recommends inclusion of emissions from all phases, including demolition, grading, construction, and operations (mobile and stationary sources). | • Subsection 4.3 (Air Quality) |
| | | • Requests analysis of overlapping construction and operational emissions compared against operational thresholds if applicable. | • Subsection 4.3 (Air Quality) |

| Commenter | Date | Comments | Location in EIR Where Comment(s) Addressed |
|---|---|---|---|
| | | • Recommends preparing a mobile source health risk assessment (HRA) due to potential exposure to diesel emissions and proximity to SR-79. | • Subsection 4.3 (Air Quality) and Appendix F-2 (Health Risk Assessment) |
| | | • Requests that the EIR evaluate exposure risks to sensitive receptors, including future residents. | • Subsection 4.3 (Air Quality) and Appendix F-2 (Health Risk Assessment) |
| | | • Recommends considering AQMD's General Plan Guidance Document in land use planning. | • Subsection 4.11 (Land Use and Planning) |
| | | • States that if new stationary sources (e.g., generators, boilers) are proposed, air permits will be required and AQMD becomes a Responsible Agency. | • Subsection 4.3 (Air Quality) and Subsection 4.8 (GHG) |
| | | • Recommends identifying feasible mitigation measures for significant air quality impacts, referencing relevant mitigation monitoring plans. | • Subsection 4.3 (Air Quality) and Section S.0 (Executive Summary) Mitigation Monitoring and Reporting Program (MMRP) |
| | | • Recommends careful evaluation of filtration systems (e.g., MERV 13+), including feasibility, cost, and effectiveness. | • Subsection 4.3 (Air Quality) |
| Native American Heritage Commission (NAHC) | April 8, 2025 | • Requests that the County comply with AB 52 tribal consultation requirements, including formal notification to traditionally and culturally affiliated tribes within 14 days of project application completeness and prior to EIR release. | • Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources) |
| | | • Recommends early consultation with California Native American tribes to avoid inadvertent discoveries and best protect tribal cultural resources. | • Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources) |
| | | • Summarizes AB 52 consultation procedures, mandatory and discretionary topics, and confidentiality requirements. | • Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources) |
| | | • Advises the County to also comply with SB 18 requirements if the project | • Subsections 4.5 (Cultural Resources) and 4.19 (Tribal |

| Commenter | Date | Comments | Location in EIR Where Comment(s) Addressed |
|---|---|---|---|
| | | involves an amendment to a Specific Plan. | Cultural Resources) |
| | | • Recommends conducting a CHRIS records search, Sacred Lands File (SLF) search, and field survey for cultural resources. | • Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources) |
| | | • Recommends including tribal monitors during ground disturbance in sensitive areas and outlines best practices for inadvertent discoveries and item disposition. | • Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources) |
| Riverside County Department of Waste Resources | April 3, 2025 | • Requests quantification of the maximum solid waste generation at buildout using appropriate waste generation factors. | • Subsection 4.20 (Utilities and Service Systems) |
| | | • Requests identification of the specific facilities anticipated to receive project-generated waste (e.g., MVTS, El Sobrante, Badlands, Lamb Canyon). | • Subsection 4.20 (Utilities and Service Systems) |
| | | • Encourages inclusion of waste diversion strategies, such as composting, drought-tolerant landscaping, and hazardous waste disposal protocols. | • Subsection 4.20 (Utilities and Service Systems) and Subsection 4.9 (Hazards and Hazardous Materials) |
| | | • Requests discussion of a Waste Recycling Plan and project compliance with SB 1383 requirements for organic waste diversion. | • Subsection 4.19 (Utilities and Service Systems) |
| Dan Silver, Executive Director, Endangered Habitats League | April 3, 2025 | • Urges that the EIR ensure compliance with the Multiple Species Habitat Conservation Plan (MSHCP), including Criteria Cell requirements. | • Subsection 4.4 (Biological Resources) |
| | | • Requests to remain on all notification lists for project updates, including DEIR availability and public hearings. | • Comment acknowledged |

### 1.5.2 Use of This EIR

This EIR will be made available for review by the public and public agencies for a minimum period of 45 days to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (State CEQA Guidelines Section 15204(a)). During the decision-making process, the Project and its design

features, objectives, merits, environmental consequences, and socioeconomic factors, among other information contained in the Project's administrative record, will be considered by Riverside County decision-makers. If the Final EIR is certified and the Project approved, Riverside County and other public agencies with permitting authority over all, or portions, of the Project would be able to use the Final EIR as part of their permitting processes to evaluate the environmental effects of the Project as they pertain to the approval or denial of applicable permits.

### 1.5.3 Contents and Organization of This EIR

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

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

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

- **Section 2.0, Environmental Setting**, describes the environmental setting, including an overview of the regional and local setting, as well as descriptions of the Project site's physical conditions and surrounding context. The existing setting is defined as the condition of the Project site and surrounding area at the approximate date this EIR's NOP was recirculated for public review on April 3, 2025. The setting discussion also addresses the relevant regional planning documents that apply to the Project site and vicinity.

- **Section 3.0, Project Description**, serves as the EIR's Project Description for purposes of CEQA and contains a level of specificity commensurate with the level of detail proposed by the Project, including the summary requirements pursuant to State CEQA Guidelines Section 15124. This Section provides a detailed description of the Project, including its purpose and main objectives; design features; landscaping; site drainage; utilities; grading and construction characteristics; and operational characteristics expected over the Project's lifetime. In addition, the discretionary actions required of the County of Riverside and other government agencies to implement the Project are discussed.

- **Section 4.0, Environmental Analysis**, provides an analysis of the potential direct, indirect, and cumulative impacts that may occur from implementing the proposed Project. The topics analyzed in this section include the topics summarized above under Section 1.5.1. A conclusion concerning significance is reached for each discussion; mitigation measures are presented as warranted. The environmental changes identified in Section 4.0 and throughout this EIR are referred to as "effects" or "impacts" interchangeably. The State CEQA Guidelines also describe the terms "effects" and "impacts" as being synonymous (State CEQA Guidelines Section 15358).

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

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

- **Section 5.0, Other CEQA Considerations**, includes specific topics that are required by CEQA. These include a summary of the Project's significant and unavoidable environmental effects, a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented, as well as potential growth-inducing impacts of the proposed Project.

- **Section 6.0, Project Alternatives**, describes and evaluates alternatives to the proposed Project that could reduce or avoid the Project's adverse environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives that will foster informed decision making and public participation. A range of three (3) alternatives is presented in Section 6.0.

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

CEQA requires that an EIR contain, at a minimum, certain specified content. Table 1-3, *Location of CEQA Required Topics*, provides a quick reference in locating the CEQA-required sections within this document.

**Table 1-3 Location of CEQA Required Topics**

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

### 1.5.4 Incorporation by Reference

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

identified in the body of the EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this EIR.

Therefore, the detailed technical studies, reports, and supporting documentation that were used in preparing this EIR are bound separately as Technical Appendices. The Technical Appendices are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92502, during the County's regular business hours or can be requested in electronic form by contacting the County's Planning Department. The individual technical studies, reports, and supporting documentation that comprise the Technical Appendices are as follows:

A1. 2021 Prior Project Notice of Preparation (NOP) and Written Comments on the NOP
A2. 2025 Proposed Project NOP and Written Comments on the NOP
B1. Air Quality Impact Analysis
B2. Construction Health Risk Assessment
C1. Biological Resources Assessment
C2. Determination of Biologically Equivalent or Superior Preservation (DBESP)
C3. Biological Resources Assessment Addendum (0.13-acre Off-Site Impact Area)
D1. Phase I Cultural Assessment
D2. Cultural Resources Update
E. Energy Analysis
F1. Updated Geotechnical Report & Infiltration Evaluation
F2. Preliminary Geotechnical Report
F3. Rock Hardness Evaluation
G. Greenhouse Gas (GHG) Analysis
H1. Phase I Environmental Site Assessment (ESA)
H2. Limited Phase II ESA
I1. Preliminary Drainage Report
I2. Preliminary Water Quality Management Plan (WQMP)
J. Noise Impact Analysis (NIA)
K. Paleontological Resources Impact Mitigation Program (PRIMP)
L1. Vehicle Miles Traveled (VMT) Analysis
L2. Traffic Study
L3. Highway 79 Policy Area Consistency Analysis
M1. Water Supply Assessment (WSA)
M2. Supplemental WSA
N. Fire Protection Plan (FPP)
O. Keller Crossing Specific Plan No. 380, Amendment No. 1
P. General Plan Consistency Analysis

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

relied upon by this EIR are included as part of Riverside County's Administrative Record pertaining to the proposed Project.

## 1.6 RESPONSIBLE AND TRUSTEE AGENCIES

The California Public Resource Code (Section 21104) requires that all EIRs be reviewed by responsible and trustee agencies (see also State CEQA Guidelines Section 15082 and Section 15086(a)). As defined by State CEQA Guidelines Section 15381, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project." A Trustee Agency is defined in State CEQA Guidelines Section 15386 as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California."

For the proposed Project, the Riverside County Flood Control and Water Conservation District (RCFCWCD) is a Responsible Agency and would be responsible for approving the Project's drainage infrastructure. Eastern Municipal Water District (EMWD) is a Responsible Agency that would review and approve proposed water and sewer connections. The San Diego Regional Water Quality Control Board (RWQCB) is identified as a Responsible Agency, and would be responsible for issuance of a National Pollutant Discharge Elimination System (NPDES) Permit to ensure that on-site water flows do not result in siltation, other erosional effects, or degradation of surface or subsurface water quality, and for issuance of a Construction General Permit. The San Diego RWQCB also would be responsible for issuing a Waste Discharge Order for Project impacts to RWQCB jurisdictional areas pursuant to Section 13260 of the California Water Code. The California Department of Fish and Wildlife (CDFW) is identified as a Trustee Agency for issuance of a 1602 Streambed Alteration Agreement. There are no other agencies that are identified as Responsible or Trustee Agencies for the proposed Project.

## 1.7 AREAS OF CONTROVERSY

Substantive issues raised in response to the NOPs circulated for the Prior Project and proposed Project were previously summarized in Table 1-1 and Table 1-2, respectively. The purpose of these tables is to present the primary environmental issues of concern raised by public agencies and the general public during the public review period for the 2021 and 2025 NOPs. The tables are not intended to list every comment received by the County during the public review periods for the 2021 and 2025 NOPs. Regardless of whether or not a comment is listed in the tables, all applicable comments received in responses to the 2021 and 2025 NOPs are addressed in this EIR. Based on comments received during the public review period for the 2021 and 2025 NOPs, concerns were raised regarding potential impacts to air quality, biological resources, cultural resources, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, noise, tribal cultural resources, transportation, and utilities/service systems. No other areas of controversy were identified as part of the NOP process, beyond comments regarding the Project's potential environmental effects.

## 1.8 TO BE RESOLVED BY THE DECISION-MAKING BODY

The primary issues to be resolved by the decision-making body for the proposed Project involve the Project's significant and unavoidable impact under the issue area of Transportation, which is addressed in EIR Subsection 4.18. The Riverside County Board of Supervisors will need to evaluate whether the mitigation measures proposed to reduce the Project's unavoidable impact to Transportation adequately reduce Project impacts to the maximum feasible extent. The Board of Supervisors will also make a determination as to whether the Project's benefits outweigh this adverse environmental effect in support of adopting a Statement of Overriding Consideration's pursuant to State CEQA Guidelines Section 15093. Finally, the Board of Supervisors will decide whether to approve one of the Project alternatives in lieu of the proposed Project, if it is determined that one of the alternatives is feasible and its approval would serve to substantially reduce or avoid significant environmental impacts.

# 2.0 ENVIRONMENTAL SETTING

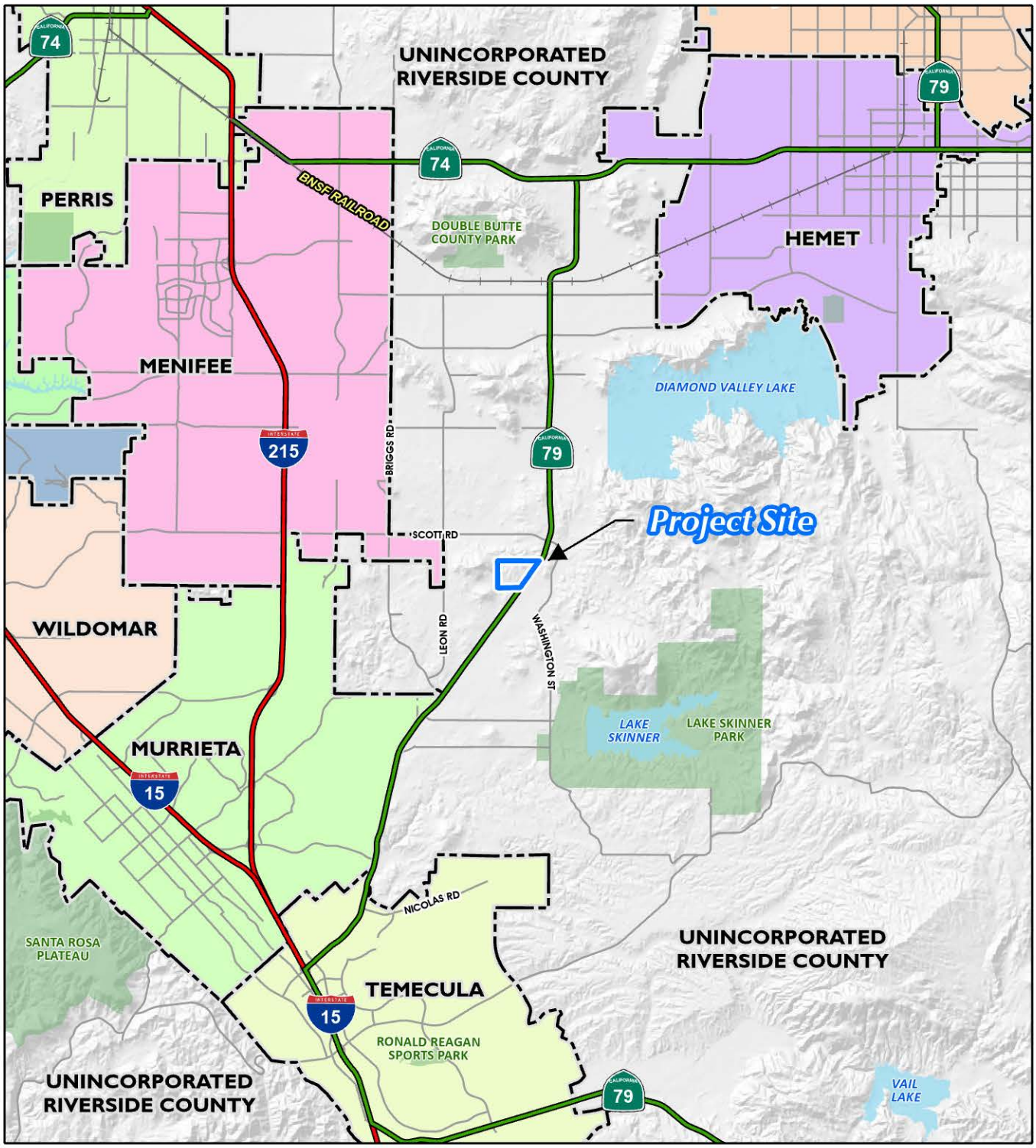
This Section 2.0 is provided pursuant to State CEQA Guidelines Section 15125(a), and includes a description of the physical environmental conditions in the vicinity of the Project site and its off-site improvement areas from both a local and regional perspective as it existed at the time the Notice of Preparation (NOP) was published and recirculated for this EIR, which occurred on April 3, 2025. This Section provides a brief overview of resources on and surrounding the Project site; additional detail regarding existing conditions for individual issue areas (e.g., biology, geology, etc.) is provided within the appropriate subsection headings within Section 4.0, *Environmental Analysis*, of this EIR.

## 2.1 REGIONAL SETTING AND LOCATION

The 196.1-acre Project site is located in unincorporated western Riverside County, California. Figure 2-1, *Regional Map*, depicts the Project site's location within the regional vicinity. As shown, Riverside County is bordered by San Bernardino County to the north, Orange County to the west, and San Diego and Imperial Counties to the south. Riverside County is part of the broader Inland Empire, a rapidly urbanizing subregion of Southern California that includes western Riverside County, western San Bernardino County, and portions of eastern Los Angeles County. According to the Southern California Association of Governments (SCAG), Riverside County had a population of approximately 2.39 million in 2019, with the population anticipated to increase to 2.99 million by 2050, an increase of approximately 606,000 residents. Regionwide, SCAG estimates that the total population across its six-county area will increase from 18.8 million in 2019 to approximately 20.9 million by 2050, reflecting a moderated growth trajectory compared to prior forecasts. (SCAG, 2024, Table 3.1)

## 2.2 LOCAL SETTING AND LOCATION

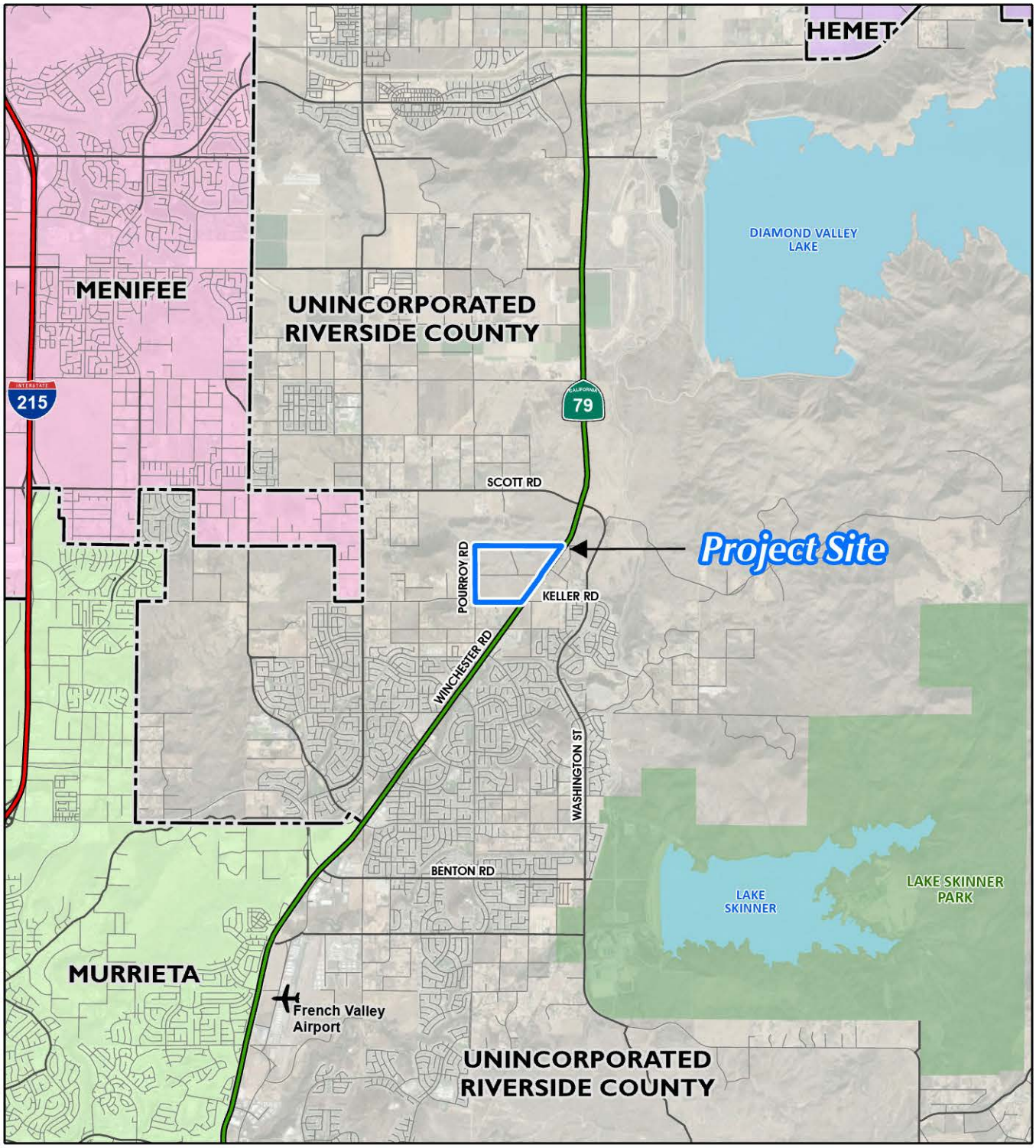
The Project site is located within the western region of unincorporated Riverside County, California. As depicted in Figure 2-2, *Vicinity Map*, the Project site is within the French Valley Community of the Southwest Area Plan (SWAP) portion of unincorporated Riverside County and is within the Sphere of Influence (SOI) of the City of Murrieta. The Project site is located northeast of the City of Murrieta, southeast of the City of Menifee, and is approximately 2.2 miles southwest of Diamond Valley Lake. SR-79 borders the eastern boundary of the Project site, State Route 74 (SR-74) is located approximately 4.0 miles north of the Project site, while Interstate 215 (I-215) is located approximately 7.3 miles southwest of the Project site (Google Earth, 2025). From the local perspective, and as depicted on Figure 2-2, *Vicinity Map*, the 196.1-acre Project site is bound to the south by Keller Road, to the west by the future alignment of Pourroy Road, and to the east by Winchester Road/Highway 79 (SR-79). The Project site encompasses Assessor Parcel Numbers (APNs) 472-110-(001, 002, 003, 004, 007, 008, 009, 032, 033, and 034). The 196.1-acre Project site is located in Section 21, Township 6 South, Range 2 West, San Bernardino Baseline and Meridian. (RCIT, n.d.)




Source(s): Esri; RCIT, n.d.

Figure 2-1

Regional Map




Source(s): Esri; RCIT, n.d.

Figure 2-2

Vicinity Map

## 2.3 SURROUNDING LAND USES

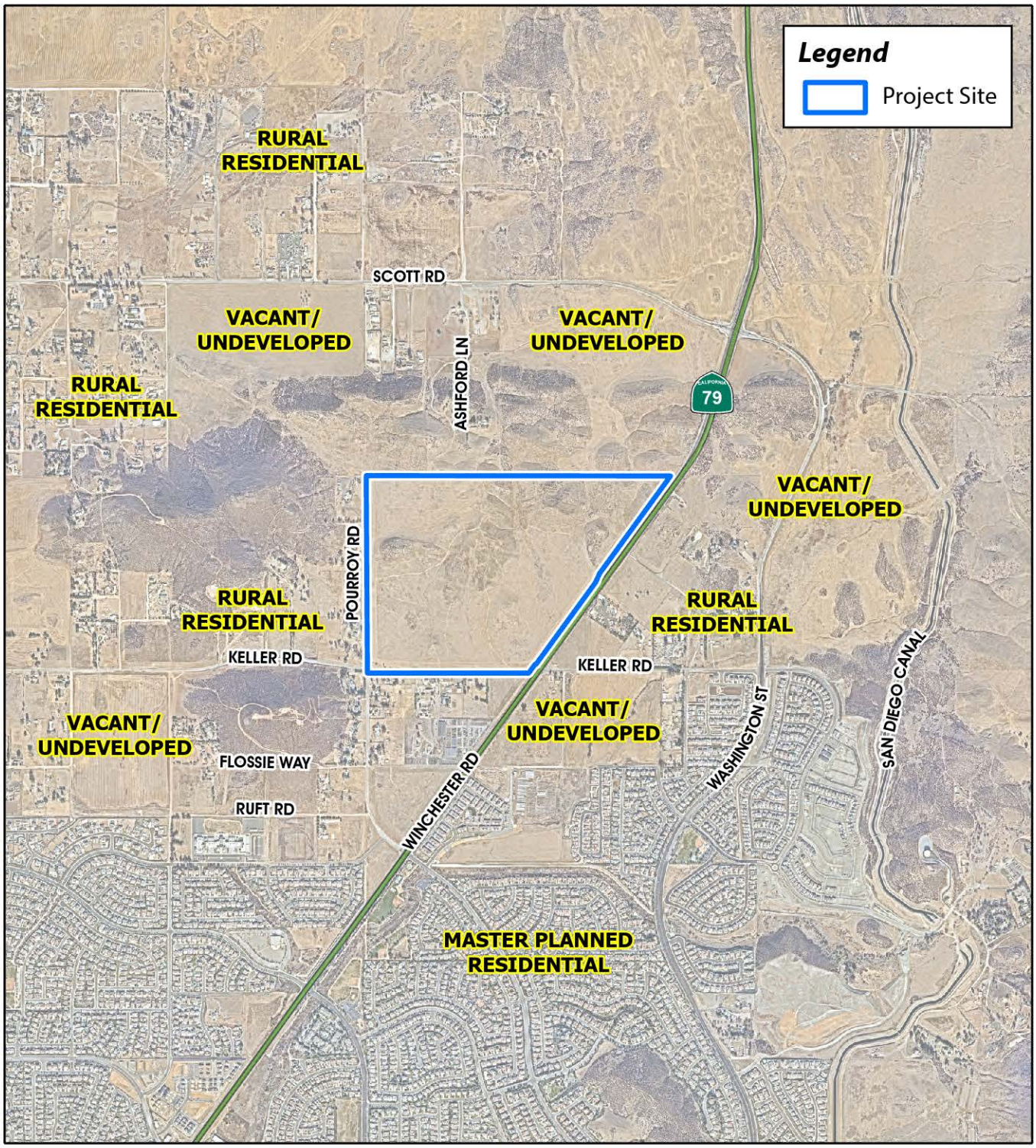
Land uses in the immediate vicinity of the Project site are illustrated on Figure 2-3, *Surrounding Land Uses and Development*. Land to the west and north of the Project site includes vacant and undeveloped land along with several rural residential homes. Keller Road abuts the southern boundary of the Project site, beyond which are undeveloped lands, open space, and a few residential homes, with a master-planned residential community located further to the south. SR-79 abuts the eastern boundary of the Project site, beyond which are undeveloped lands and a few rural residential homes.

## 2.4 LOCAL PLANNING CONTEXT

State CEQA Guidelines Section 15125(d) requires that EIRs identify the general plans and regional plans that are applicable to the project under evaluation and recognize potential inconsistencies. Plans that are applicable to the Project evaluated herein are summarized below, with additional information provided in the applicable resource discussions in Section 4.0, *Environmental Analysis*.

### 2.4.1 SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code Section 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. As an MPO and public agency, SCAG develops transportation and housing strategies that transcend jurisdictional boundaries that affect the quality of life for southern California as a whole. On April 4, 2024, SCAG's Regional Council adopted *Connect SoCal (2024-2050 Regional Transportations Plan/Sustainable Communities Strategy)*. Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions (CTCs), tribal governments, non-profit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Connect SoCal includes over 4,000 transportation projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs, and replacement bridges. These future investments were included in county plans developed by the six CTCs and seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices. The goals of Connect SoCal are to: 1) encourage regional economic prosperity and global competitiveness; 2) improve mobility, accessibility, reliability, and travel safety for people and goods; 3) enhance the preservation, security, and resilience of the regional transportation system; 4) increase person and goods movement and travel choices within the transportation system; 5) reduce greenhouse gas emission and improve air quality; 6) support healthy and equitable communities; 7) adapt to a changing climate and support an integrated regional development pattern and transportation network; 8) leverage new transportation technologies and data-driven solutions that result in more efficient travel; 9) Encourage development of diverse housing types in areas that are supported by multiple transportation options; and 10) Promote conservation of natural and agricultural lands and restoration of habitats. (SCAG, 2020a)




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.

Figure 2-3

0 500 1,000 2,000 Feet

Surrounding Land Uses and Development

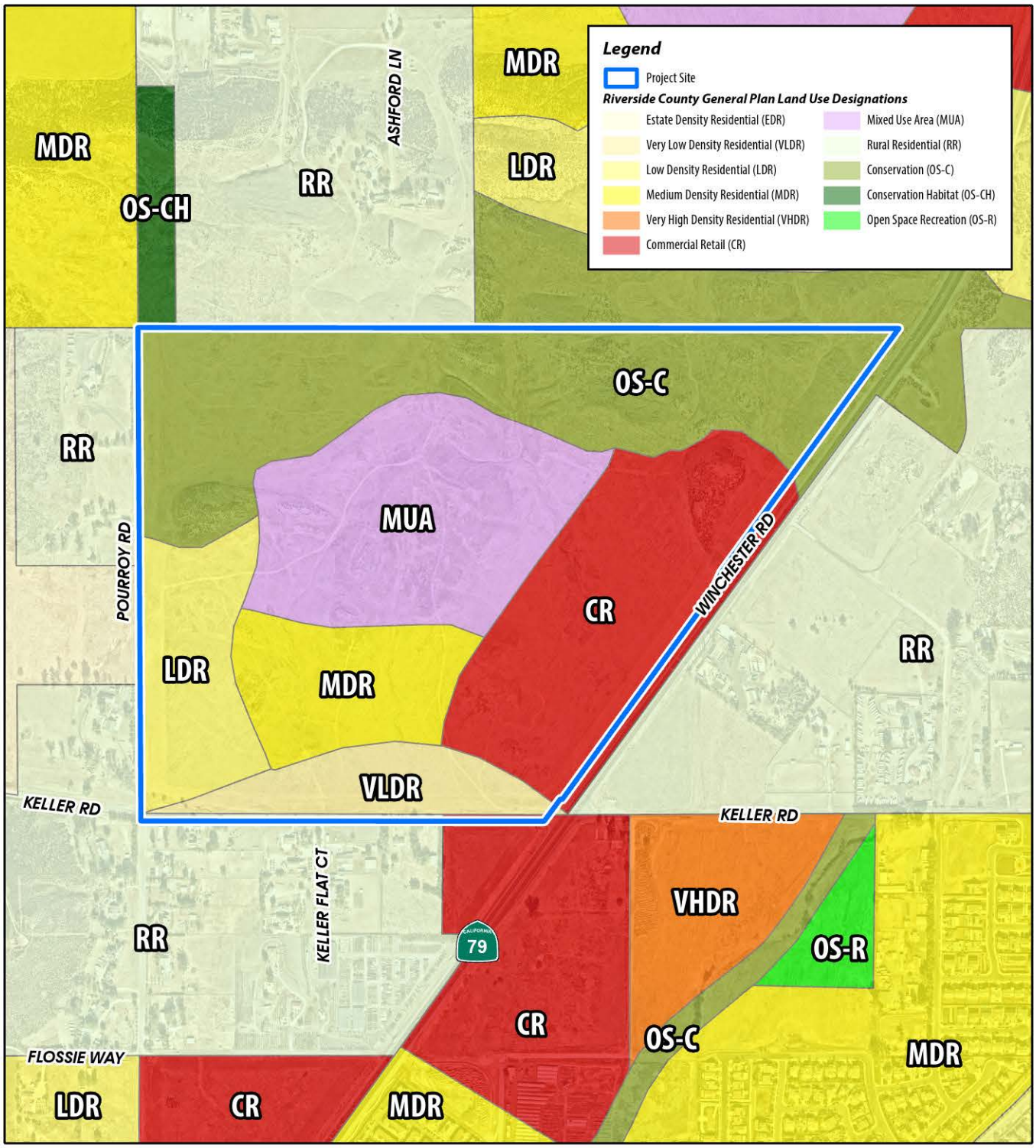
### 2.4.2 South Coast Air Quality Management District Air Quality Management Plan (AQMP)

Currently, the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are exceeded in most parts of the South Coast Air Basin (SCAB). In response, and in conformance with California Health and Safety Code Section 40702 et seq. and the California Clean Air Act, the South Coast Air Quality Management District (SCAQMD) has adopted a series of Air Quality Management Plans (AQMPs) to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. Each version of the plan is an update of the previous plan and has a 20-year horizon with a revised baseline. In December 2022, the SCAQMD released the Final 2022 AQMP (2022 AQMP). The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal Clean Air Act (CAA) requirements. The 2022 AQMP is based on assumptions provided by the EMission FACtor model (EMFAC) developed by the California Air Resources Board (CARB) for motor vehicle information and assumptions provided by SCAG for demographics. The air quality levels projected in the 2022 AQMP are based on the assumption that development associated with general plans, specific plans, residential projects, and wastewater facilities will be constructed in accordance with population growth projections identified by SCAG in its 2020 RTP/SCS. The 2022 AQMP also assumes that such development projects will implement strategies to reduce emissions generated during the construction and operational phases of development. (SCAQMD, 2022)

### 2.4.3 County of Riverside General Plan and Southwest Area Plan (SWAP)

The prevailing planning document for the Project site and its surrounding area is the Riverside County General Plan. The Project site is located within the SWAP portion of the Riverside County General Plan. As depicted on Figure 2-4, *Existing General Plan Land Use Designations*, the County's General Plan and SWAP indicate that the entire 196.1-acre Project site is located within the Keller Crossing Specific Plan No. 380 (SP 380) and is designated by the General Plan and SWAP for "Very Low Density Residential (VLDR)," "Low Density Residential (LDR)," "Medium Density Residential (MDR)," "Mixed Use," "Commercial Retail (CR)," and "Open Space-Conservation (OS-C)." (Riverside County, 2021b, Figure 3)

Additionally, the entire 196.1-acre Project site is located within the Highway 79 Policy Area, which is intended to address transportation infrastructure capacity within the policy area. Applicable policies are also located in the Circulation Element of the General Plan. Proposed developments within the Highway 79 Policy Area are required to demonstrate that adequate transportation infrastructure capacity exists or will exist to accommodate the added traffic growth. Additionally, the Highway 79 Policy Area requires that




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.

Figure 2-4

0 200 400 800 Feet

Existing General Plan Land Use Designations

proposed development must produce traffic at a level that is 9% less than the trips projected from the 2003 General Plan traffic model residential land use designations. (Riverside County, 2021b, p. 36).

### 2.4.4 Keller Crossing Specific Plan

The 196.1-acre Project site is located fully within the boundaries of the Keller Crossing Specific Plan No. 380 (SP 380), which was adopted by Riverside County on November 3, 2013. The intent of SP 380 is to create a flexible development program that would provide a broad array of land uses, create a mixed-use master plan that is responsive to the future needs of the surrounding communities, respect the natural terrain and topography, respect the heritage of the French Valley, provide thoughtful edge condition treatments, and create a mixed-use pedestrian-friendly community that is based on sustainability principles. As shown on Figure 2-5, *Existing Specific Plan Land Use Designations*, the Project site is currently designated by SP 380 for development with 3 VLDR dwelling units on 9.9 acres; 25 LDR dwelling units on 18.3 acres; 42 MDR dwelling units on 13.9 acres; 39.5 acres of Mixed Use, including 250 dwelling units and 250,000 square feet (s.f.) building area; 400,000 s.f. of CR uses on 37.8 acres; 61.1 acres of OS-C uses; and 20.6 acres of major circulation facilities. (Riverside County, 2013, Table 2-1)

### 2.4.5 City of Murrieta General Plan

The City of Murrieta General Plan was last updated on July 7th, 2020. The plan provides a foundation for City policies and actions and guides both the physical development of Murrieta and the provision of public infrastructure and services. The Project is located within the City of Murrieta's Sphere of Influence (SOI). The Sphere of Influence area is composed of 5,341 acres east of the City's boundary, generally located south of Scott Road, west of Winchester Road (SR-79), and north of Clinton Keith Road/Los Alamos Road. The County of Riverside currently is responsible for the administration of land use decisions within the Sphere of Influence. The City of Murrieta designates pre-zoning for the areas within the SOI, and designates the Project site for land uses that are consistent with the existing SP380, as described above in subsection 2.4.4.

### 2.4.6 Zoning

The Riverside County Land Use Ordinance (Ordinance No. 348) is intended to implement the Riverside County General Plan's land use plan. As shown on Figure 2-6, *Existing Zoning Classifications,* the Project site is zoned "Specific Plan (SP)," indicating that the property is within the boundaries of an adopted Specific Plan. As such, the 196.1-acre Project site is subject to the zoning classifications established by the adopted SP 380 zoning ordinance, which generally reflects the land use designations applied to the site as part of SP 380 (described above in subsection 2.4.4). (RCIT, 2021)

### 2.4.7 Western Riverside County Multiple Species Habitat Conservation Plan

The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), a regional Habitat Conservation Plan (HCP), was adopted on June 17, 2003, and an Implementing Agreement (IA) was executed between the United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and participating entities. The intent of the Western Riverside County MSHCP is to preserve native

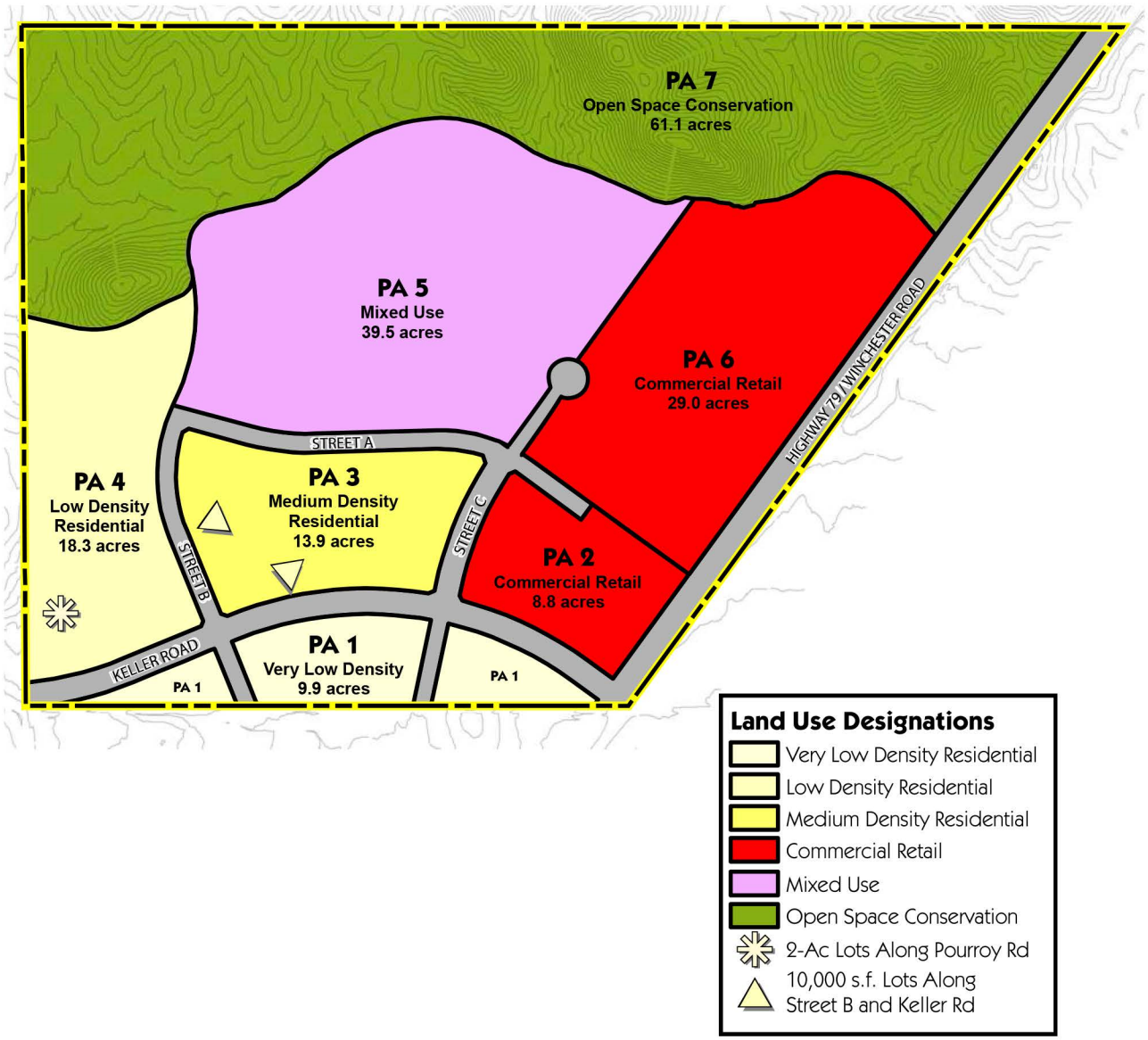
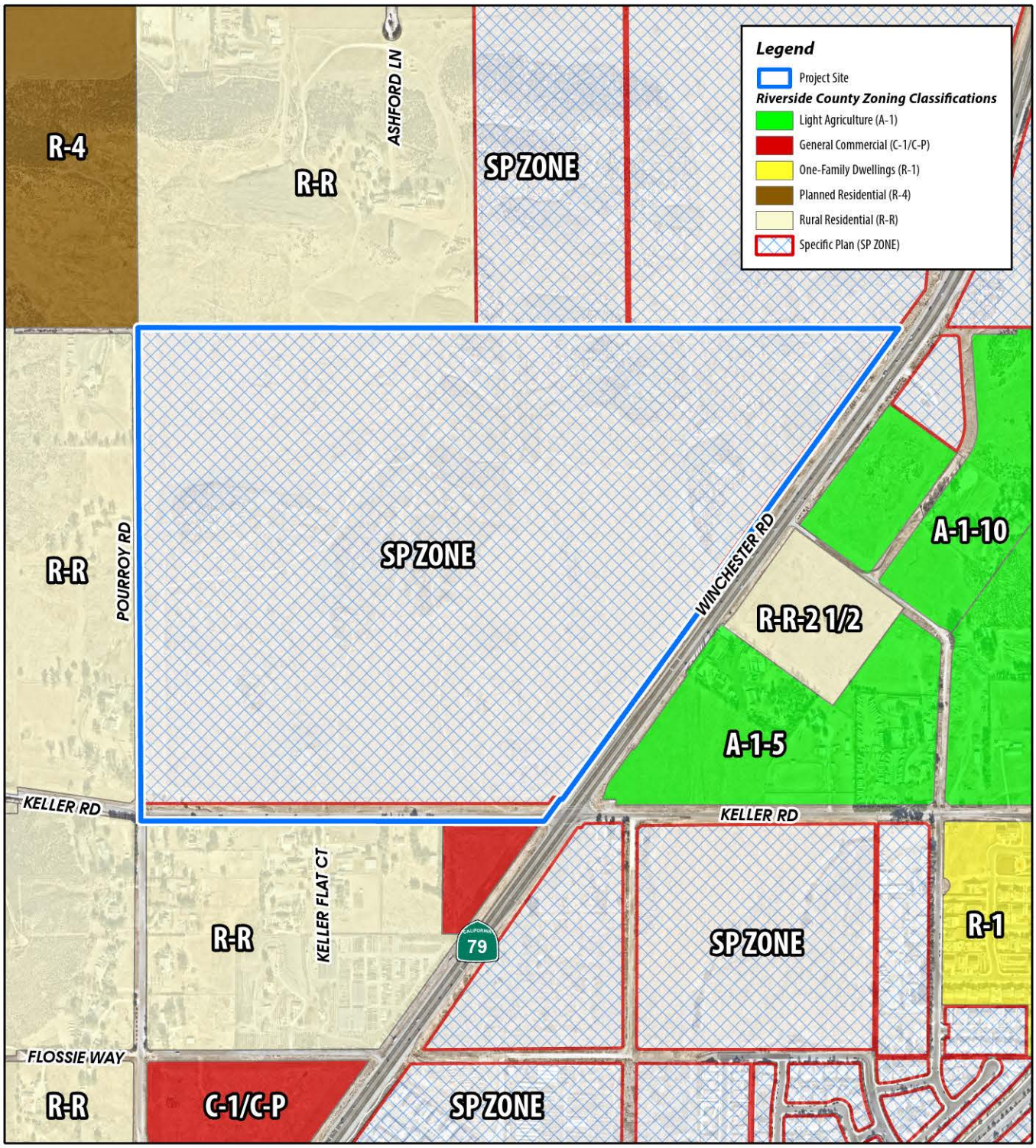



Figure 2-5

Not to Scale

Existing Specific Plan Land Use Designations




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.

Figure 2-6

0 200 400 800 Feet

Existing Zoning Classifications

vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. The MSHCP identifies Criteria Cells and Cell Groups, in which habitat conservation efforts are targeted. As shown on Figure 2-7, *MSHCP Cell Groups and Criteria Cells,* the Project site is located within MSHCP Criteria Cells 5169 and 5173, neither of which are located within a Cell Group. According to the MSHCP, conservation within Cell 5169 is intended to focus on grassland, chaparral, and coastal sage scrub habitat, with conservation comprising approximately 25% to 35% of Cell 5169 focusing in the northern portion of the Cell. Conservation within Cell 5173 is intended to focus on chaparral habitat and agricultural land, with conservation comprising approximately 20% to 30% of Cell 5173 focusing in the northern portion of the cell. (RCIT, n.d.; Riverside County, 2023b, Table 3-16)

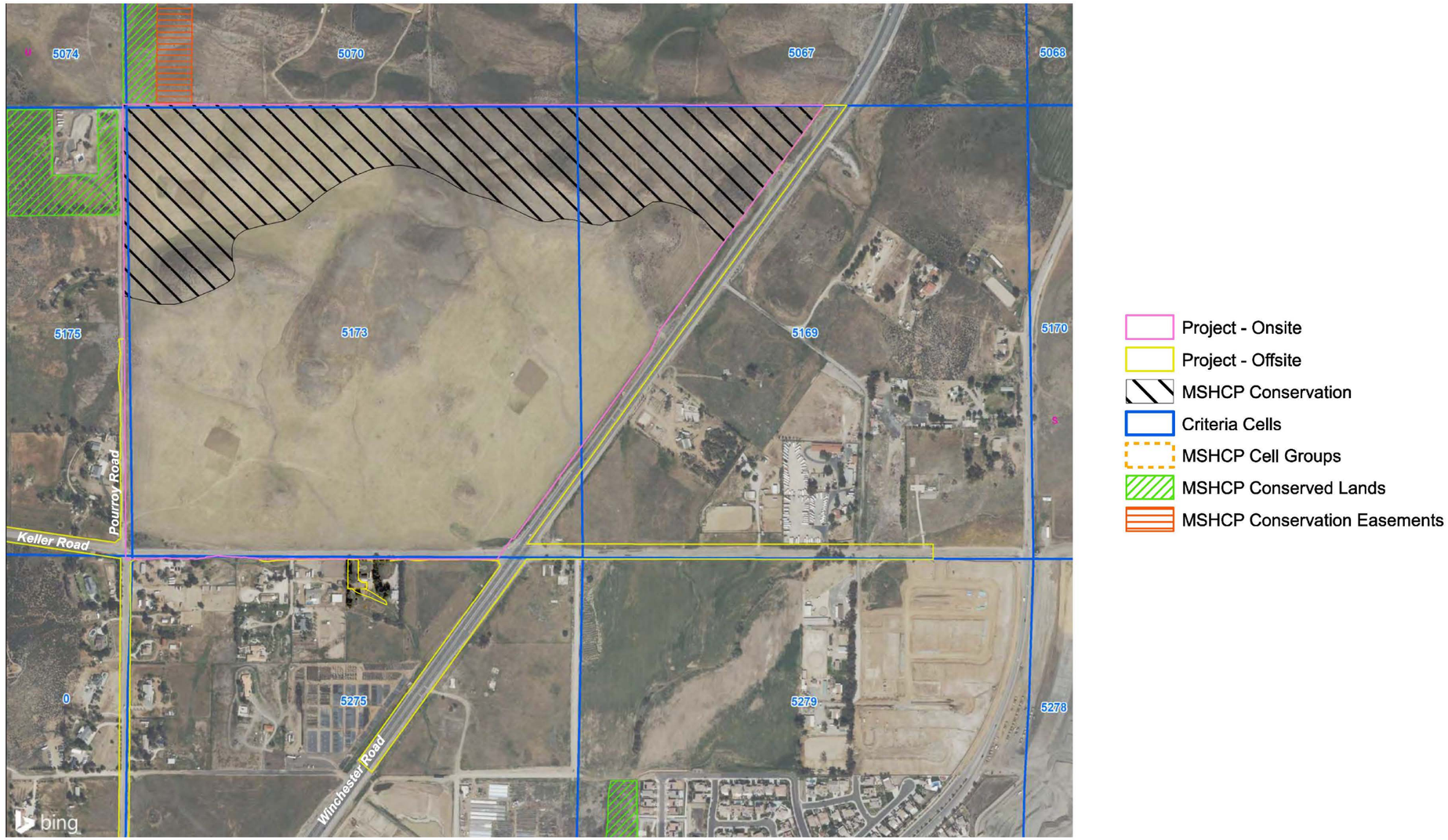
In addition to conservation criteria within areas designated to be included within the MSHCP Reserve System, the MSHCP also identifies a number of additional survey and conservation requirements. A small portion of the Project site along the western boundary is located within the Criteria Area Species Survey Area (CASSA) for Parish's brittlescale, Davidson's saltscale, Thread-leaved brodiaea, Round-leaved filaree, Smooth tarplant, Coulter's goldfields, Little mousetail, and Mud nama. The same area of the Project site also is located within the Narrow Endemic Plant Species Survey Area (NEPSSA) for Munz's onion, San Diego ambrosia, Many-stemmed dudleya, Spreading navarretia, California Orcutt grass, and Wrights's trichocoronis. The entire Project site also is located within the Burrowing Owl Survey Area. The Project site is not located with any amphibian, mammal, or invertebrate species survey areas. (RCA, 2021) Refer to EIR Subsection 4.4, *Biological Resources*, for a complete description of applicable MSHCP requirements and the Project's consistency with the MSHCP.

## 2.5 EXISTING PHYSICAL SITE CONDITIONS

Pursuant to State CEQA Guidelines Section 15125, the physical environmental condition for purposes of establishing the setting of an EIR is the environment as it existed at the time the EIR's NOP was released for public review. The NOP for this EIR was recirculated for public review on April 3, 2025. The following subsections provide a description of the Project site's physical environmental condition ("existing conditions") as of that approximate date. The site's current physical conditions and surrounding areas are shown on Figure 2-8, *Aerial Photograph*. More detailed information regarding the Project's site's environmental setting as it relates to a specific environmental issue area is provided in the various subsections of EIR Section 4.0, *Environmental Analysis*.

### 2.5.1 Land Use

The existing land use condition of the Project areas is shown on Figure 2-8. As shown, under existing conditions, the Project site consists of undeveloped land that is used for dryland farming. The northern portions of the Project site include several rolling hill forms that contain natural vegetation. Highway 79 abuts the Project site's eastern boundary and is improved with two travel lanes in each direction. Keller Road abuts the southern boundary of the Project site, and currently consists of a partially improved gravel roadway.

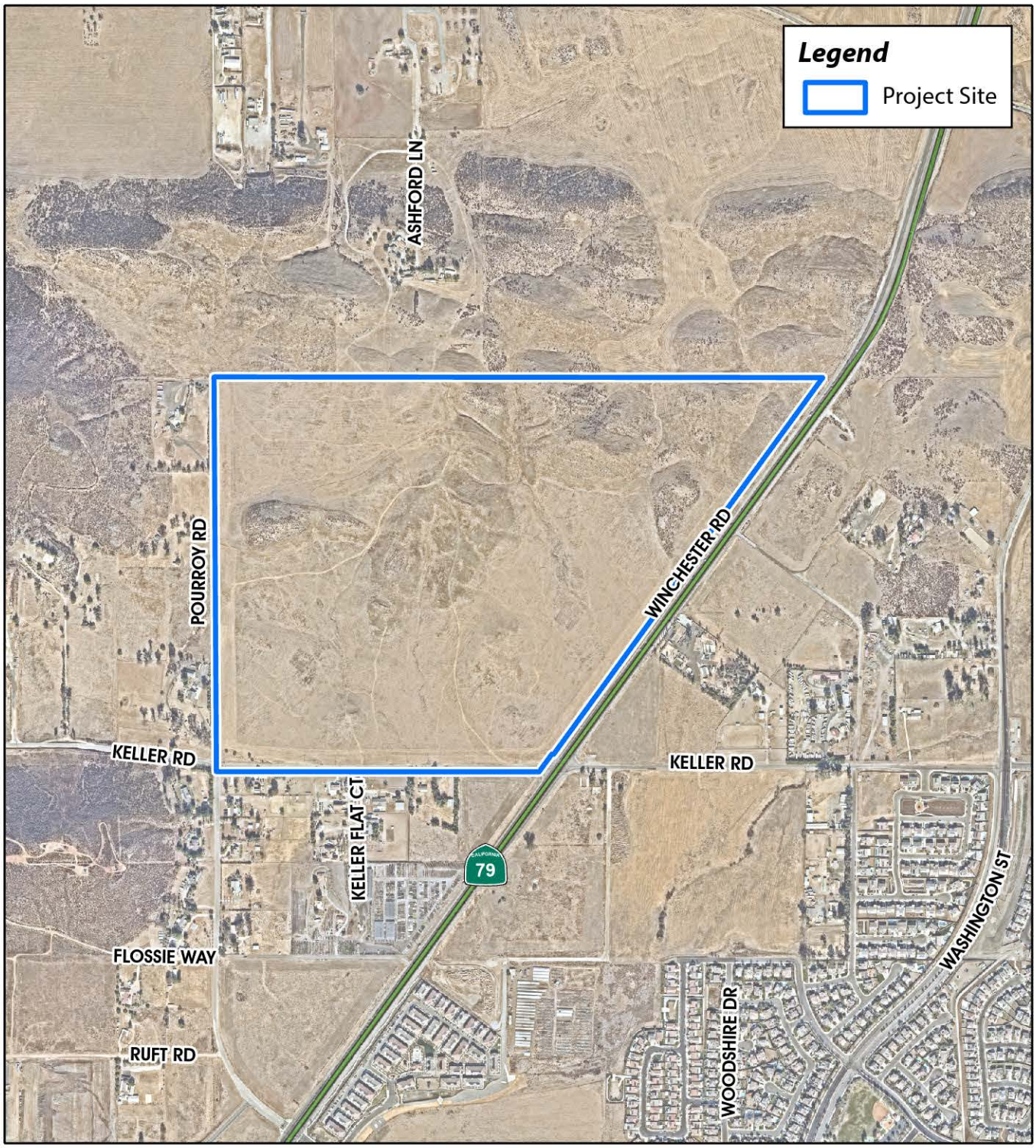



Source(s): Glenn Lukos Associates, 2025

Figure 2-7

Not to Scale

MSHCP Cell Groups and Criteria Cells




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.

Figure 2-8

Aerial Photograph

### 2.5.2 Site Topography

As shown in Figure 2-9, *USGS Topographic Map*, the Project site's topography is characterized by relatively flat topography in the southern portions of the site, with undulating hill forms occurring in the north and northeastern portions of the Project site. Elevations on site range from 1,422 feet above mean sea level (amsl) in the southeast corner of the Project site to 1,587 feet amsl near the northeast corner of the Project site. (Google Earth, 2018)

### 2.5.3 Air Quality And Climate

The Project site is located in the South Coast Air Basin (SCAB) within the jurisdiction of SCAQMD. The SCAQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and State air quality standards. The Project site is located within the SCAB, a 6,745-square mile subregion of the SCAQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. (Urban Crossroads, 2026, p. 9)

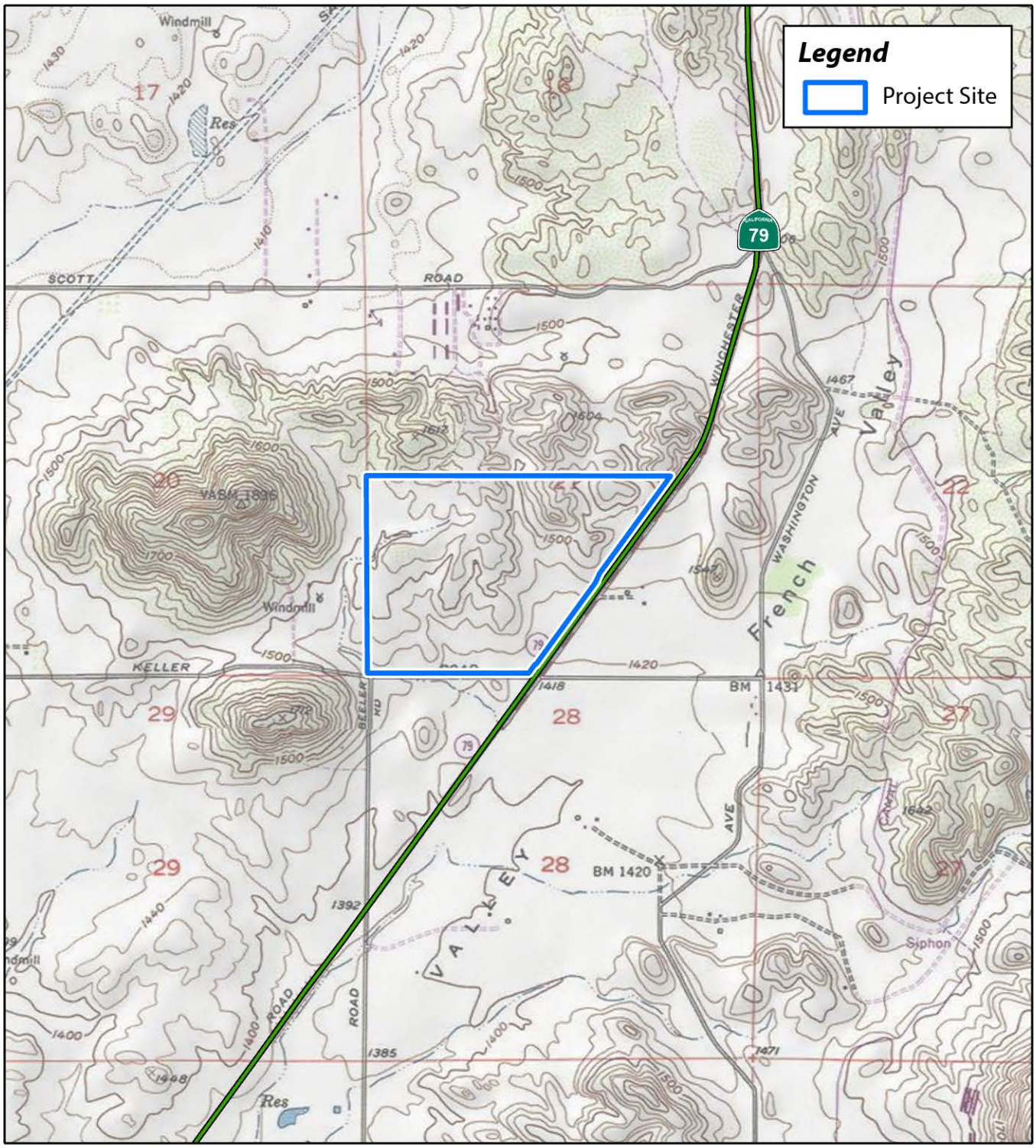
As documented in the Project's Air Quality Impact Analysis (*Technical Appendix B* to this EIR), although the climate of the SCAB is characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. More than 90% of the SCAB's rainfall occurs from November through April. Temperatures during the year range from an average minimum of 36°F in January to over 100°F maximum in the summer. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Ana[s]" each year. (Urban Crossroads, 2026, p. 9)

### 2.5.4 Agriculture and Forestry Resources

Under existing conditions, the Project site is used for agricultural production. As more fully discussed in EIR Subsection 4.2, *Agriculture and Forestry Resources*, the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) identifies "Important Farmland" to include lands mapped as "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland." As mapped pursuant to the FMMP, the 196.1-acre Project site contains "Farmland of Local Importance" and "Other Lands," and does not contain any "Important Farmland" types. The Project site is not zoned for agricultural use and is not subject to any Williamson Act contracts or County Agricultural Preserves. Additionally, no forestry resources occur on site under existing conditions. (RCIT, 2021)

### 2.5.5 Biological Resources

The Project site and off-site improvement areas support the following vegetation/land cover types: agriculture, developed, disturbed, disturbed buckwheat scrub, ornamental, and disturbed mulefat scrub,




Source(s): Esri; USGS (2013)

Figure 2-9

0 500 1,000 2,000 Feet

USGS Topographic Map

none of which comprise a special-status vegetation community. During focused surveys, only one special-status plant, paniculate tarplant (*Deinandra paniculata*), was detected on site. The following special-status animals were detected within the Study Area: California horned lark (*Eremophila alpestris actia*), northern harrier (*Circus cyaneus*), and American badger (*Taxidea taxus*). Potential jurisdictional features within the Project site and off-site improvement areas include ten ephemeral drainage features, referred to herein as Drainages A, A-1, B, C, D, E, F, G, H, and I. Within the Project site and off-site improvement areas, there is a total of 0.54-acre of Regional Water Quality Control Board (Regional Board) jurisdictional areas, none of which consists of wetlands, and 0.63-acre of California Department of Fish and Wildlife jurisdictional areas (consisting of 0.58-acre of non-riparian stream and 0.05-acre of riparian stream), while no portions of the Project site or off-site improvement areas contain waters subject to the jurisdiction of the Army Corps of Engineers (Corps). Additionally, there are no State- or federally-protected wetlands within the Project site and off-site improvement areas. Refer to EIR Subsection 4.4, *Biological Resources*, for a detailed description of the vegetation communities that occur on site.

### 2.5.6 Geology

The Project site is located the Peninsular Range Province of Southern California. The Peninsular Ranges are essentially a series of northwest-southeast oriented fault blocks. Several major fault zones are found in this province. The Elsinore Fault zone and the San Jacinto Fault zone trend northwest-southeast and are mostly found near the middle of the province. The San Andreas Fault zone borders the northeasterly margin of the province, and the San Jacinto fault borders the province adjacent the Colorado Desert province. (GeoTek, Inc., 2021, p. 8)

The Project site is located in an area geologically mapped to be underlain mostly by meta-sedimentary (phyllite) bedrock (phyllite and schist, with abundant feldspar and quartz) with areas in the southeast, south, and west of the site underlain by alluvium that have been geologically mapped as older alluvium. Additionally, the site was geologically mapped as being underlain by very old alluvial deposits and Phyllite bedrock. (GeoTek, Inc., 2021, p. 8)

### 2.5.7 Soils

Table 2-1, *Summary of On-Site Soils*, provides a summary of the soils present on the Project site, and identifies the attendant rate of runoff and erosion susceptibility. As shown, approximately 15.8% of the Project site has a “Slow” rate of runoff and a “Slight” susceptibility to erosion. Approximately 1.9% of the Project site has a “Slow to Medium” rate of erosion and a “Moderate” susceptibility to erosion. Approximately 15.7% of the Project site has a “Medium” rate of runoff and a “Moderate” susceptibility to erosion. Approximately 49.5% of the Project site has a “Rapid” rate of runoff and a “High” susceptibility to erosion. Approximately 17.1% of the Project site has a “Very Rapid” rate of runoff and a “Very High” susceptibility to erosion. (USDA, 1971, pp. 36, 40, and 60; USDA, n.d.)

**Table 2-1 Summary of On-Site Soils**

| Map Symbol | Map Unit Name | Rate of Runoff | Erosion Susceptibility | Acres in AOI[1, 2] | Percent of AOI[1, 2] |
|---|---|---|---|---|---|
| EcC2 | Escondido fine sandy loam, 2 to 8 percent slopes, eroded | Slow | Slight | 31.3 | 15.8% |
| EcD2 | Escondido fine sandy loam, 8 to 15 percent slopes, eroded | Medium | Moderate | 11.3 | 5.9% |
| FwE2 | Friant fine sandy loam, 5 to 25 percent slopes, eroded | Medium | Moderate | 0.0 | 0.0.% |
| GaC | Garretson very fine sandy loam, 2 to 8 percent slopes | Slow to Medium | Moderate | 3.4 | 1.7% |
| LaC | Las Posas loam, 2 to 8 percent slopes | Slow to Medium | Moderate | 0.3 | 0.2% |
| LaD2 | Las Posas loam, 8 to 15 percent slopes, eroded | Medium | Moderate | 0.0 | 0.0% |
| LoF2 | Lodo gravelly loam, 15 to 50 percent slopes, eroded | Rapid | High | 83.8 | 42.7% |
| LpE2 | Lodo rocky loam, 8 to 25 percent slopes, eroded | Rapid | High | 3.8 | 1.9% |
| LpF2 | Lodo rocky loam, 25 to 50 percent slopes, eroded | Very Rapid | Very High | 33.5 | 17.1% |
| VaE3 | Vallecitos loam, 8 to 25 percent slopes, severely eroded | Rapid | High | 9.5 | 4.9% |
| VeC2 | Vallecitos loam, thick solum variant, 2 to 8 percent slopes, eroded | Medium | Moderate | 13.3 | 6.8% |
| VsD2 | Vista coarse sandy loam, 8 to 15 percent slopes, eroded | Medium | Moderate | 5.9 | 3.0% |
| **Totals for Area of Interest:** | | **--** | **--** | **196.1** | **100.0%** |

1. AOI = Area of Interest.
2. Values reflect rounding.

(USDA, 1971, pp. 30, 34, 42-44, and 62-65; USDA, n.d.)

### 2.5.8 Hydrology

Under existing conditions, natural drainage patterns on the Project site generally flow from the higher elevations in the north toward the south and southeast. Runoff ultimately exits the site toward several existing Caltrans reinforced concrete pipe (RCP) culvert under-crossings along Winchester Road (Highway 79). A significant off-site tributary area to the southwest of the Project site also conveys stormwater across Pourroy Road and Keller Road in a southeasterly direction. This watercourse then continues adjacent to existing residential properties before crossing Winchester Road via existing Caltrans RCP culverts. Currently, there is no formal storm drain infrastructure within the boundaries of the Project site or within the rights-of-way along Pourroy Road and Keller Road. (RTM, 2025, p. 3)

### 2.5.9 Noise

The most common and significant source of noise in Riverside County is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., commercial, and institutional) that generate stationary-source noise. The Project site abuts Highway 79 to the east and Keller Road to the south. As shown in EIR Table 4.13-1, the ambient recorded noise levels in the Project area range from 46.8 to 64.2 A-weighted decibels (dBA) equivalent noise level (Leq) during daytime hours and from 36.8

to 57.7 dBA Leq during nighttime hours. (Urban Crossroads, 2025d, p. 29) Refer to EIR Subsection 4.13, *Noise*, for additional information regarding the site's existing noise conditions.

### 2.5.10 Transportation

Regional access to the Project site is primarily provided via Winchester Road (Highway 79), which abuts the eastern boundary of the Project site. Highway 79 provides access to Highway 74 to the north and to Interstate 15 (I-15) in the south. Highway 74 is located approximately 4.0 miles to the north of the Project site, Interstate 215 (I-215) is located approximately 4.0 miles west of the Project site, and I-15 is located approximately 7.3 miles southwest of the Project site.

As shown on Figure 7 of the SWAP, the Riverside County General Plan and SWAP classify Highway 79 as an "Expressway (128' to 220' ROW)" facility. Along the Project site's frontage, Keller Road is classified as a "Secondary (100' ROW)" facility, while the portion of Pourroy Road located south of Keller Road also is classified as a "Secondary (100' ROW)" facility. The future segment of Pourroy Road that abuts the western boundary of the Project site is not classified by the SWAP. (Riverside County, 2021b, Figure 7)

Riverside County currently is served by the Riverside Transit Authority (RTA), a public transit agency serving the unincorporated Riverside County region. Bus Route 79 travels along portions of Highway 79 and has a stop located at Pourroy Road one mile south of the Project site. Transit service is reviewed and updated by RTA periodically to address ridership, budget, and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. (Urban Crossroads, 2025f, p. 49):

Under existing conditions, no pedestrian or bicycle facilities have been constructed on the Project site. As shown in Figure 8 of the SWAP, there are proposed Community Trails along Leon Road, Keller Road, and Pourroy Road and a proposed regional trail along Abelia Street. (Riverside County, 2021b, Figure 8; Urban Crossroads, 2025f, p. 36)

### 2.5.11 Public Facilities

Fire protection services in the Project area are primarily provided by the Riverside County Fire Department (RCFD). The primary fire station servicing the site would be RCFD Station 83 (37500 Sky Canyon Dr, Murrieta, CA) which is located approximately 4.6 miles and nine (9) minutes driving time to the furthest point in the Project site. Secondary fire protection service would be provided by RCFD Station 34 (32655 Haddock St, Winchester, CA), which is located approximately 5.8 miles and nine (9) minutes driving time to the furthest point in the Project site. The third closest fire station is Murrieta Fire Department Station #2 (28155 Baxter Road, Murrieta, CA), located approximately 6.7 miles and 12 minutes away from the furthest portion of the Project site. Additional agencies such as nearby cities also would respond equipment under mutual aid agreements but would likely arrive after RCFD engines are on-scene. The fourth closest fire station is RCFD Station 76 (29950 Menifee Road, Menifee, CA), located approximately 8.2 miles and 15 minutes away from the furthest portion of the Project site. (Firewise 2000, 2025, p. 18; Google Earth, 2025)

The Riverside County Sheriff's Department (RCSD) provides community policing to the Project area via the Southwest Station located at 30755 Auld Road, Suite A, Murrieta, CA 92563, approximately 3.4 roadway miles south of the Project site (Google Earth, 2025). The Riverside County Sheriff's Department has set a minimum level of service standard of 1.0 deputy per 1,000 people. In addition to community policing, other services provided by the Sheriff's Department include, but are not limited to, operating of the emergency 911 system, operating correctional facilities, performing traffic control, and providing crime prevention education. Also, the Sheriff's Department coordinates with volunteer groups such as Neighborhood Watch Programs and the Community Oriented and Policing Problem Solving (COPPS) Program and the Community Oriented Policing (COP) Program.

The Project site is located in the attendance boundary of the Menifee Union School District (MUSD) for K-8 school services, and the Perris Union High School District (PUHSD) for high school services. The nearest school within the MUSD is Harvest Hill Steam Academy, which provides K-8 school services and is located at 31600 Pat Road in Winchester, or approximately 0.5 mile southwest of the Project site. The nearest high school within the PUHSD is the Liberty High School, located at 32255 Leon Road in Winchester, or approximately 3.6 miles northwest of the Project site. (Google Earth, 2025).

Major park facilities within the Project vicinity include Brookfield Park and Washington Park. Brookfield Park is located approximately 1.3 miles south of the Project site. Washington Park is approximately 1.2 miles east of the Project site. (Google Earth, 2025).

The Project site is located within the Riverside County Public Library System (RCPLS) service area. The nearest library servicing the Project area is the French Valley Public Library, which was recently constructed at 31526 Skyview Road in the Winchester community, or approximately 1.3 miles southwest of the Project site. In addition, the Sun City Library is located at 26982 Cherry Hills Blvd., or approximately 7.3 miles northwest of the Project site. (Google Earth, 2025).

### 2.5.12 Utilities and Service Systems

#### A. Water Service

The Project site is located in the service area of the Eastern Municipal Water District (EMWD). The EMWD provides water services to communities in Riverside County extending from Moreno Valley to Temecula, and west of Perris to the City of Hemet. Approximately 75% of the EMWD's potable water demand is supplied from imported water from Metropolitan Water District (MWD) of Southern California through its Colorado River Aqueduct and its connections to the State Water Project. The remaining 25% of potable water demand within EMWD is supplied through groundwater management and desalination efforts. As discussed in the EMWD's Urban Water Management Plan (UWMP), EMWD has adequate water supplies that are available to meet EMWD's estimated water demand through the year 2045 under normal, historic single-dry year, and historic multiple-dry year conditions. (EMWD, 2021c)

Under existing conditions, there is an 18-inch domestic water transmission line at the intersection of Pourroy Road and Ruft Road located approximately 0.4-mile southwest of the Project site, and a 12-inch domestic

water line in Washington Street approximately 0.6-mile southeast of the Project site. Additionally, recycled water service is available in the area from an existing 24-inch recycled water line, located approximately 1.0 mile west of the Project site within Leon Road.

**B. Sewer Service**

The Project site is located in the service area of EMWD. The EMWD wastewater collection and treatment facilities treat approximately 43 million gallons per day (mgd) of wastewater at its four active regional water reclamation facilities through 1,813 miles of sewer pipelines. (EMWD, 2021b) Under existing conditions, there is an existing 18-inch sewer main within Abelia Street southeast of Highway 79, approximately 0.5-mile south of the Project site. Sewer flows from the Project area are conveyed to the Temecula Valley Regional Water Reclamation Facility (TVRWRC) for treatment, which has a current daily capacity of 23 million gallons per day (mgd) with typical daily flows of approximately 14 mgd. The TVRWRC has an ultimate capacity of 28 million gpd. (EMWD, 2021a)

**C. Solid Waste Services**

The Riverside County Department of Waste Resources (RCDWR) is responsible for the efficient and effective landfill disposal of non-hazardous county waste within the County, and operates six active landfills in addition to holding a contract agreement to dispose of waste at the private El Sobrante Landfill (Riverside County, 2015, p. 4.17-36). Solid waste generated by the Project would be disposed at either the El Sobrante Landfill or the Lamb Canyon Landfill. The El Sobrante Landfill is located approximately 23.3 miles to the northwest of the Project site at 10910 Dawson Canyon Road in Riverside County, while the Lamb Canyon Landfill is located approximately 17.2 miles northeast of the Project site at 16411 Lamb Canyon Road in the City of Beaumont.

**D. Other Services**

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

### 2.5.13 Rare And Unique Resources

As required by State CEQA Guidelines Section 15125(c), the environmental setting should identify any inconsistencies between a proposed project and applicable general, specific, or regional plans, and place special emphasis on resources that are rare or unique to that region and would be affected by the project. The principal discretionary actions required of Riverside County to implement the Project are described in detail in Section 3.0, *Project Description*, and are listed in Table 3-6, *Matrix of Project Approvals/Permits*.

Based on the existing conditions of the Project site and surrounding area described above and discussed in more detail in Section 4.0, *Environmental Analysis*, the Project site does not contain any rare or unique resources. A majority of the Project site is subject to on-going agricultural activities or is otherwise routinely disturbed for fire abatement purposes, and thus the Project site does not contain major areas of sensitive biological resources. As discussed in EIR Section 4.2, *Agriculture and Forest Resources*, the Project consists

primarily of land classified as "Farmlands of Local Importance," although such farmland is not rare or unique in the Project region. Additionally, the Project site does not contain any trees that would be considered part of a forest. Based on a review of the site's existing conditions, there are no rare or unique resources on the Project site.

### 2.5.14 References


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# 3.0 PROJECT DESCRIPTION

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

## 3.1 REGIONAL SETTING

The approximately 196.1-acre Project site is located within the western portion of unincorporated Riverside County, California. Figure 2-1 (previously presented) depicts the Project site's location within the regional vicinity. As shown, Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximate 28,000 square-mile region comprising western San Bernardino County, western Riverside County, and the eastern reaches of Los Angeles County.

## 3.2 PROJECT LOCATION AND SETTING

As previously depicted on Figure 2-2, the Project site is located within the French Valley Community of the Southwest Area Plan (SWAP) of unincorporated Riverside County. More specifically, the approximately 196.1-acre Project site is bound to the south by Keller Road, to the west by the future alignment of Pourroy Road, and to the east by Highway 79 (SR-79). The approximately 196.1-acre Project site is vacant and undeveloped under existing conditions, with the flatter portions in the western and southern portions of the site having been used for dryland farming. Land to the west and north of the Project site includes vacant and undeveloped land along with several rural residential homes. Keller Road is immediately south of the Project site, beyond which are undeveloped lands and a few residential homes. Highway 79 occurs immediately east of the Project site, beyond which are undeveloped lands, open space, and a few rural residential homes. Refer to EIR Section 2.0 for a detailed description of the local setting and surrounding land uses.

## 3.3 PROPOSED PROJECT

The proposed Project consists of applications for a General Plan Amendment (GPA210004), an amendment to the Keller Crossing Specific Plan No. 380 (SP00380A01), a Change of Zone (CZ2100012), and a Tentative Tract Map (TTM38163) to allow for the future development of the approximately 196.1-acre Project site with a mix of residential, recreational, and open space land uses. The Project would entail development of the approximately 196.1-acre Project site with up to 694 residential dwelling units, including 77 "Medium-Density Residential (MDR)" units on 16.03 acres, 307 "Medium-High-Density Residential (MHDR)" units on 44.63 acres, and 310 "High-Density Residential (HDR)" units, 80 of which are designated as age-restricted, on 26.71 acres. The Project would also include 8.88 acres of "Open Space–Recreation" (OS-R), 16.00 acres of "Open Space–Water" (OS-W), 61.42 acres of "Open Space–Conservation Habitat" (OS-CH), 3.49 acres of

"Open Space–Conservation" (OS-C), and 18.89 acres of major circulation facilities. This EIR analyzes the physical effects associated with all components of the proposed Project, including planning, construction, and ongoing operation. The governmental approvals requested from Riverside County to implement the Project consist of the following:

1. Adoption by resolution of a General Plan Amendment (GPA210004);
2. Adoption of Amendment No. 1 to Specific Plan No. 380 (SP00380A01);
3. Adoption by ordinance of a Change of Zone (CZ2100012); and
4. Adoption by resolution of Tentative Tract Map No. 38163 (TTM38163)

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

## 3.4 STATEMENT OF OBJECTIVES

The underlying purposes of the proposed Project are to develop a master-planned residential community that provides a range of housing types – including single-family, multi-family, and age-qualified – supported by recreational amenities and a variety of open space areas, including parks, habitat conservation, and water quality features. The Project is intended to comply, to the greatest extent feasible, with applicable Riverside County standards, codes, and policies. The following is a list of specific objectives that the proposed Project intends to achieve.

A. To efficiently develop an underutilized property with a complementary mix of land uses, including residential, recreational, and open space land uses.

B. To establish a master-planned community in a manner that is sensitive to the environment as well as visually and functionally compatible with surrounding existing and proposed land uses.

C. To develop a master-planned 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 and age-qualified multi-family homes that will be marketable within the evolving economic profile of Riverside County and surrounding communities.

E. 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.

F. To require project design elements such as architecture, landscaping, color, paving, walls, fencing, signage, entry treatments, and other similar design features that would ensure the community is developed in a manner that is aesthetically pleasing.

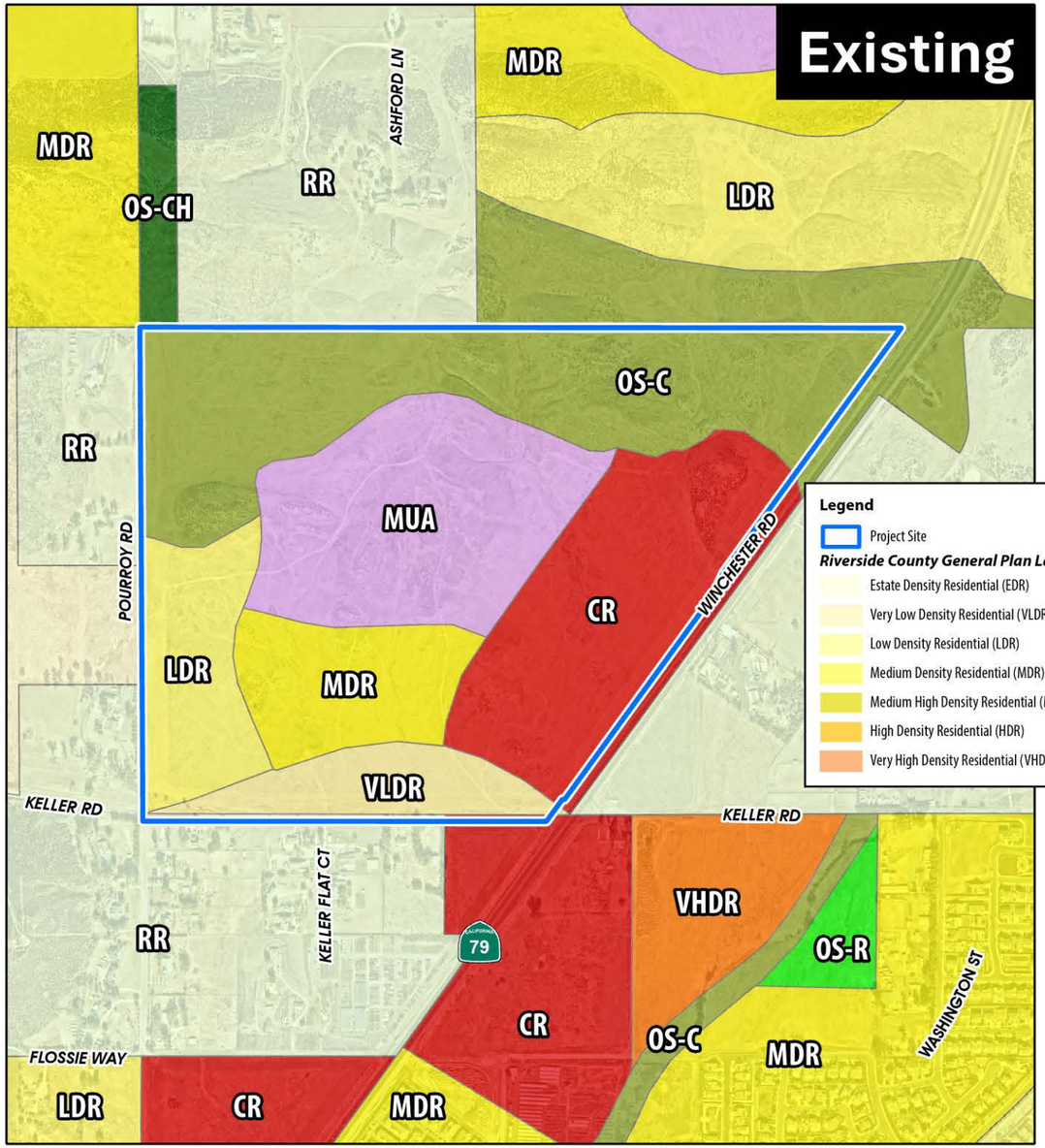
G. To establish development phasing that results in logical coordinated growth.

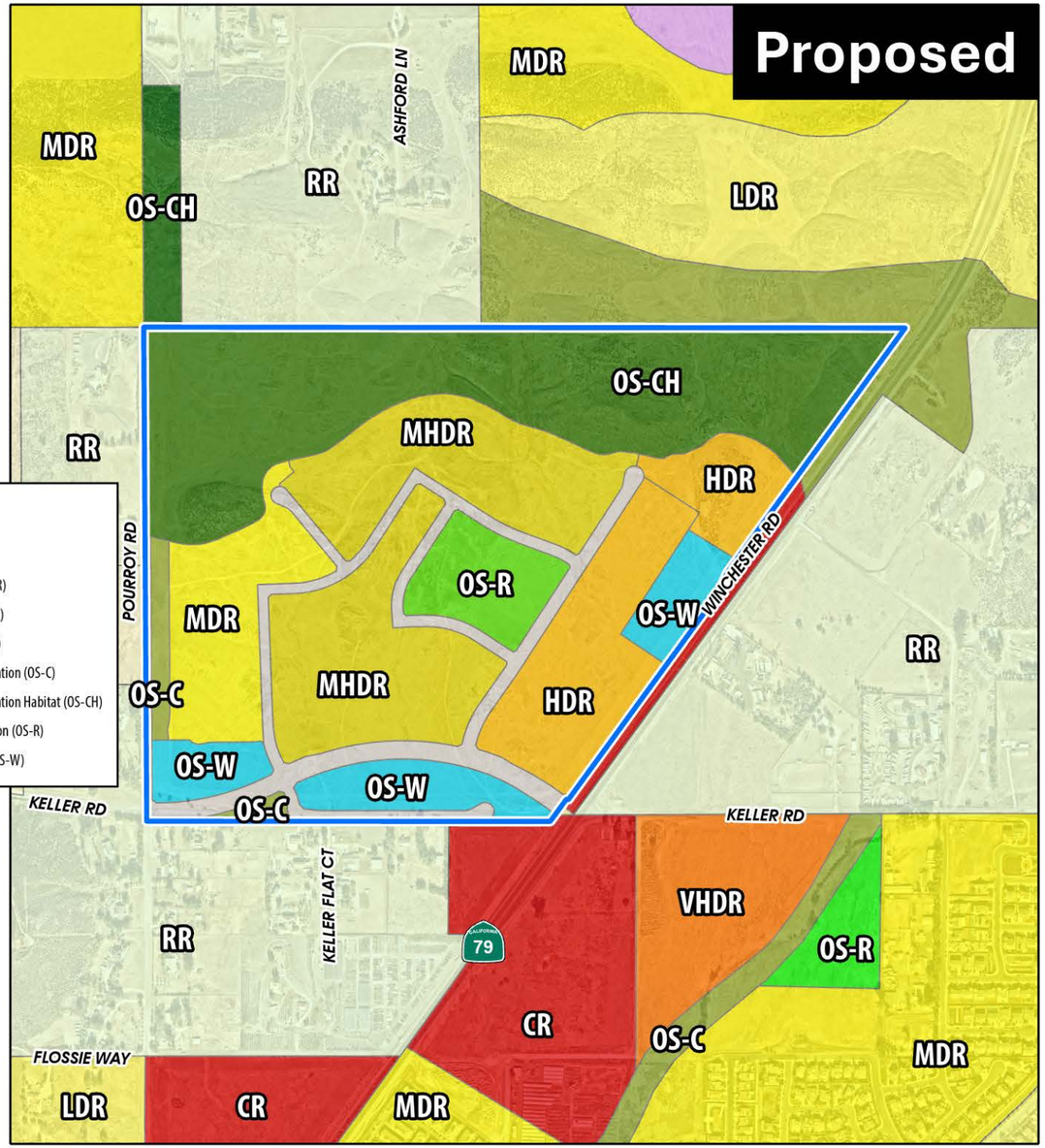
## 3.5 PROJECT'S COMPONENT PARTS AND DISCRETIONARY APPROVALS

The proposed Project consists of applications for General Plan Amendment No. 210004 (GPA210004), Amendment No. 1 to the Keller Crossing Specific Plan No. 380 (SP00380A01; herein, "SP 380A1"), Change of Zone No. 2100012 (CZ2100012), and Tentative Tract Map No. 38163 (TTM38163) to allow for the future development of the approximately 196.1-acre Project site with up to 694 residential dwelling units and a 8.88-acre park. The principal discretionary actions required of the County of Riverside to implement the Project are described in detail on the following pages. Additional discretionary and administrative actions that may be necessary to implement the proposed Project are listed in Table 3-6, *Matrix of Project Approvals/Permits,* at the end of this Section.

### 3.5.1 General Plan Amendment No. 210004

As depicted in, Figure 3-1, *General Plan Amendment No. 210004,* the Project Applicant proposes to revise the existing General Plan land use designations across the approximately 196.1-acre Project site. Under existing conditions, the Project site is designated for "Very Low Density Residential (VLDR)," "Low Density Residential (LDR)," Medium Density Residential (MDR), "Mixed Use," "Commercial Retail (CR)," and "Conservation" land uses. As part of GPA No. 210004, the approximately 196.1-acre Project site would be redesignated to include 16.03 acres of "Medium Density Residential (MDR)," 44.63 acres of "Medium-High Density Residential (MHDR)," 26.71 acres of "High Density Residential (HDR)," 8.88 acres of "Open Space–Recreation (OS-R)," 16.00 acres of "Open Space–Water (OS-W)," 61.42 acres of "Open Space–Conservation Habitat (OS-CH)," and 3.49 acres of "Open Space–Conservation (OS-C)," with approximately 18.89 acres allocated for roadways and circulation infrastructure. The MDR land use designation is intended to accommodate single-family detached and attached residential development with a density range of 2 to 5 dwelling units per acre and minimum lot sizes ranging from 5,500 to 20,000 square feet. The MHDR designation supports residential development at 5 to 8 dwelling units per acre and may include small-lot detached homes, townhomes, or cluster housing on lots of 4,000 to 6,500 square feet. The HDR designation supports higher-density residential development with a range of 8 to 14 dwelling units per acre and is intended to accommodate multi-family housing, age-qualified communities. The OS-R designation is intended to accommodate recreational uses including parks (neighborhood parks allowed), trails, athletic fields, and golf courses. The OS-C land use designation land use designation is intended to provide for the protection of open space for natural hazard protection, cultural preservation, and natural and scenic resource preservation. The OS-CH land use designation applies to public and private lands conserved and managed in accordance with adopted Multi Species Habitat and other Conservation Plans and in accordance with related Riverside County policies. The OS-W land use designation is intended to accommodate bodies of water and natural or artificial drainage corridors.




**Legend**

Project Site

***Riverside County General Plan Land Use Designations***

- Estate Density Residential (EDR)
- Very Low Density Residential (VLDR)
- Low Density Residential (LDR)
- Medium Density Residential (MDR)
- Medium High Density Residential (MHDR)
- High Density Residential (HDR)
- Very High Density Residential (VHDR)
- Commercial Retail (CR)
- Mixed Use Area (MUA)
- Rural Residential (RR)
- Open Space-Conservation (OS-C)
- Open Space-Conservation Habitat (OS-CH)
- Open Space-Recreation (OS-R)
- Open Space-Water (OS-W)

Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.

Figure 3-1

0 200 400 800 Feet

### 3.5.2 Change of Zone No. 2100012

The Riverside County Zoning Ordinance (Ordinance No. 348), which is part of the County's Municipal Code, assigns a zoning designation to all properties within unincorporated Riverside County. All development within the County is required to comply with the provisions of the Zoning Ordinance. Under existing conditions, the Project site is zoned "Specific Plan Zone (SP Zone)," indicating that the property lies within the boundaries of an adopted specific plan. Accordingly, the approximately 196.1-acre Project site is subject to the zoning classifications, land use regulations, and development standards established by the adopted Keller Crossing Specific Plan No. 380 (SP 380). A Change of Zone (CZ No. 2100012) is proposed as part of the Project to revise the zoning within the Project site to reflect the modified land use plan and development standards included in Specific Plan Amendment No. 1 (SP 380A1). Specifically, CZ2100012 would amend the boundaries and development regulations of the Specific Plan's planning areas to accommodate the proposed mix of Medium Density Residential (MDR), Medium-High Density Residential (MHDR), High Density Residential (HDR), Open Space–Recreation (OS-R), Open Space–Water (OS-W), Open Space–Conservation Habitat (OS-CH), and Open Space–Conservation (OS-C) land uses, as proposed under SP 380A1. Refer to subsection 3.5.3 for a description of the land uses and development standards proposed as part of SP 380A1.

### 3.5.3 Specific Plan No 380, Amendment No. 1

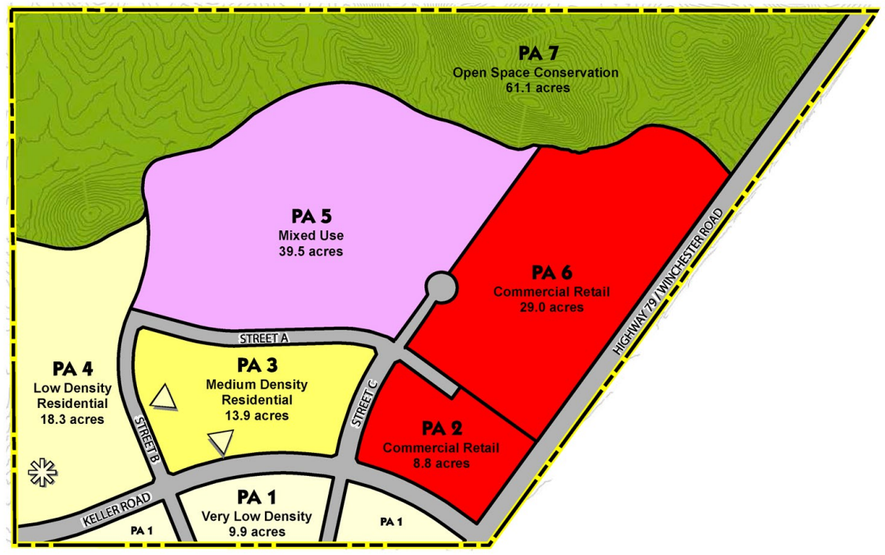
#### A. Proposed Land Uses

The Project entails the first amendment to the Keller Crossing Specific Plan No. 380 (SP 380A1). As depicted on Figure 3-2, *Specific Plan Amendment No. 380A1 Proposed Land Use Plan*, and summarized in Table 3-1, *SP 380A1 Proposed Land Uses*, proposed SP 380A1 would allow for the future development of the approximately 196.1-acre Project site with up to 694 residential dwelling units, including 77 "Medium-Density Residential (MDR)" units on 16.03 acres, 307 "Medium-High-Density Residential (MHDR)" units on 44.63 acres, and 310 "High-Density Residential (HDR)" units, 80 of which are designated as age-restricted, on 26.71 acres. The Project also would include 8.88 acres of "Open Space–Recreation" (OS-R), 16.00 acres of "Open Space–Water" (OS-W), 61.42 acres of "Open Space–Conservation Habitat" (OS-CH), 3.49 acres of "Open Space–Conservation" (OS-C), and 18.89 acres of major circulation facilities.

SP 380A1 would achieve this by modifying the allocation, distribution, lot sizes, and development standards of the land uses within the Keller Crossing Specific Plan No. 380. Specifically, the proposed land uses within SP 380A1 would include the following:

- **Medium Density Residential (MDR):** SP 380A1 would allow for a total of 77 medium-density residential dwelling units on minimum lot sizes ranging from 3,000-4,000 s.f. on approximately 16.03 acres within Planning Area (PA) 1, with an overall density of approximately 4.8 dwelling units per acre (du/ac). Access to PA 1 would be provided via Keller Road and proposed Street A.

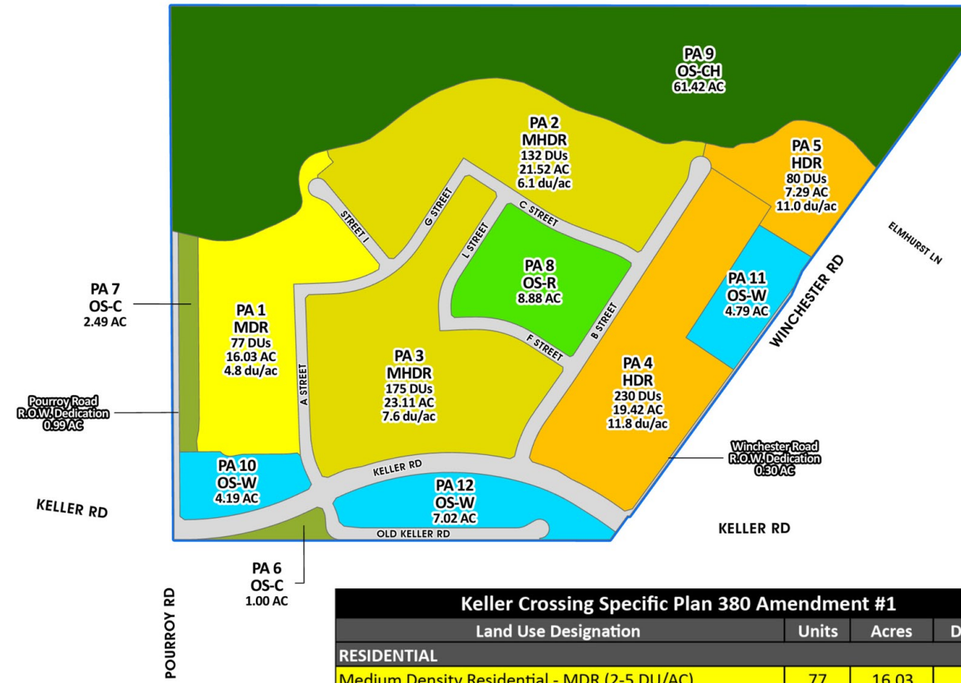
## Approved




**Approved Specific Plan No. 380 Land Use Plan Summary**

| LU Plan Designation | Units | Acres | Density |
|---|---|---|---|
| Very Low Density Residential (VLDR) | 3 | 9.9 | 0.3 |
| Low Density Residential (LDR) | 25 | 18.3 | 1.4 |
| Medium Density Residential (MDR) | 42 | 13.9 | 3 |
| Mixed Use (MU) | 250 | 39.5 | 6.4 |
| Commercial Retail (CR) | -- | 37.8 | -- |
| Open Space-Conservation (OS-C) | -- | 61.1 | -- |
| Master Plan Roadways | -- | 20.6 | -- |
| **Totals** | **320** | **201.1** | -- |

## Proposed




**Keller Crossing Specific Plan 380 Amendment #1**

| Land Use Designation | Units | Acres | Density |
|---|---|---|---|
| **RESIDENTIAL** | | | |
| Medium Density Residential - MDR (2-5 DU/AC) | 77 | 16.03 | 4.8 |
| Medium High Density Residential - MHDR (5-8 DU/AC) | 307 | 44.63 | 6.9 |
| High Density Residential - HDR (8-14 DU/AC) | 310 | 26.71 | 11.6 |
| **Residential Subtotal:** | ***694*** | ***87.37*** | ***7.9*** |
| **NON-RESIDENTIAL** | | | |
| Open Space-Recreation - OS-R | -- | 8.88 | -- |
| Open Space-Conservation - OS-C | -- | 3.49 | -- |
| Open Space-Conservation Habitat - OS-CH | -- | 61.42 | -- |
| Open Space-Water - OS-W | -- | 16.00 | -- |
| *Circulation** | -- | 18.89 | -- |
| **Non-Residential Subtotal:** | -- | ***108.68*** | -- |
| ***PROJECT TOTALS:*** | **694** | **196.05** | **--** |

***NOTES:***
*Circulation acreage includes Right-of-Way dedications for Old Keller Road, Keller Road, Winchester Road, Pourroy Road and Internal Streets.

Figure 3-2

Not to Scale

Specific Plan Amendment No. 380A1 Proposed Land Use Plan

**Table 3-1 SP 380A1 Proposed Land Uses**

| Planning Area | Units | Acres | Density | Land Use Designation |
|---|---|---|---|---|
| 1 | 77 | 16.03 | 4.8 | Medium Density Residential (MDR) |
| 2 | 132 | 21.52 | 6.1 | Medium High Density Residential (MHDR) |
| 3 | 175 | 23.11 | 7.6 | Medium High Density Residential (MHDR) |
| 4 | 230 | 19.42 | 11.8 | High Density Residential (HDR) |
| 5* (Age-Restricted) | 80 | 7.29 | 11.0 | High Density Residential (HDR) |
| **Residential Subtotal:** | **694** | **87.37** | **7.9** | |
| 6 | -- | 1.00 | -- | Open Space – Conservation (OS-C) |
| 7 | -- | 2.49 | -- | Open Space – Conservation (OS-C) |
| 8 | -- | 8.88 | -- | Open Space – Recreation (OS-R) |
| 9 | -- | 61.42 | -- | Open Space – Conservation Habitat (OS-CH) |
| 10 | -- | 4.19 | -- | Open Space – Water (OS-W) |
| 11 | -- | 4.79 | -- | Open Space – Water (OS-W) |
| 12 | -- | 7.02 | -- | Open Space – Water (OS-W) |
| **Open Space Subtotal:** | **--** | **89.79** | **--** | |
| Circulation** | -- | 18.89 | | N/A |
| **Circulation Subtotal:** | **--** | **18.89** | **--** | |
| **Project Total:** | **694** | **196.05** | **--** | **--** |

**Notes:**

*80 age-qualified units proposed in PA 5.

**Circulation includes ROW for Keller Road, Old Keller Road, Winchester Road, Pourroy Road, and internal streets (B, C, D, E, F, G).

- **Medium High Density Residential (MHDR):** SP 380A1 would allow for a total of 307 residential dwelling units within Planning Areas (PAs) 2 and 3 on minimum lot sizes ranging from 3,000-4,000 s.f. with an overall density of 6.9 du/ac. Planning Area 2 would accommodate a total of 132 MHDR dwelling units on 21.52 acres at an overall density of 6.1 du/ac, and Planning Area 3 would accommodate a total of 175 dwelling units on 23.11 acres at an overall density of 7.6 du/ac. Access to PA 2 would be accommodated via Streets A, B, C, and G, while access to PA 3 would be provided from Keller Road via Streets A and B.

- **High Density Residential (HDR):** SP 380A1 would allow for a total of 310 dwelling units on approximately 26.71 acres within Planning Areas 4 and 5, resulting in an overall density of approximately 11.6 du/ac. Planning Area 4 would accommodate 230 HDR units on 19.42 acres at an overall density of 11.8 du/ac, which are anticipated to consist of higher-density residential products such as small-lot or attached homes. Planning Area 5 would include 80 HDR dwelling units on 7.29 acres at an overall density of 11.0 du/ac, and these units are intended to be age-restricted for older adults, likely configured in a campus-style layout with shared amenities. Access to Planning Areas 4 and 5 would be provided from Keller Road via proposed Street B .

- **Open Space – Recreation (OS-R):** SP 380A1 would be designated for OS-R and would consist of a proposed community park on 8.88 acres within proposed PA 8. The proposed community park is conceptually designed to include a baseball diamond, basketball courts, pickleball courts, a tot lot,

a concession stand, an open play area, and an off-street parking lot. Access to the community park within PA 8 would be provided from Keller Road via proposed Streets B, C, F, and L.

- **Open Space – Conservation Habitat (OS-CH):** SP 380A1 would preserve approximately 61.42 acres of existing natural hillside areas within Planning Area (PA) 9, located in the northern portion of the Project site, for long-term conservation purposes consistent with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). No development is proposed within PA 9, and this area would remain in its natural condition to support habitat preservation and wildlife movement.

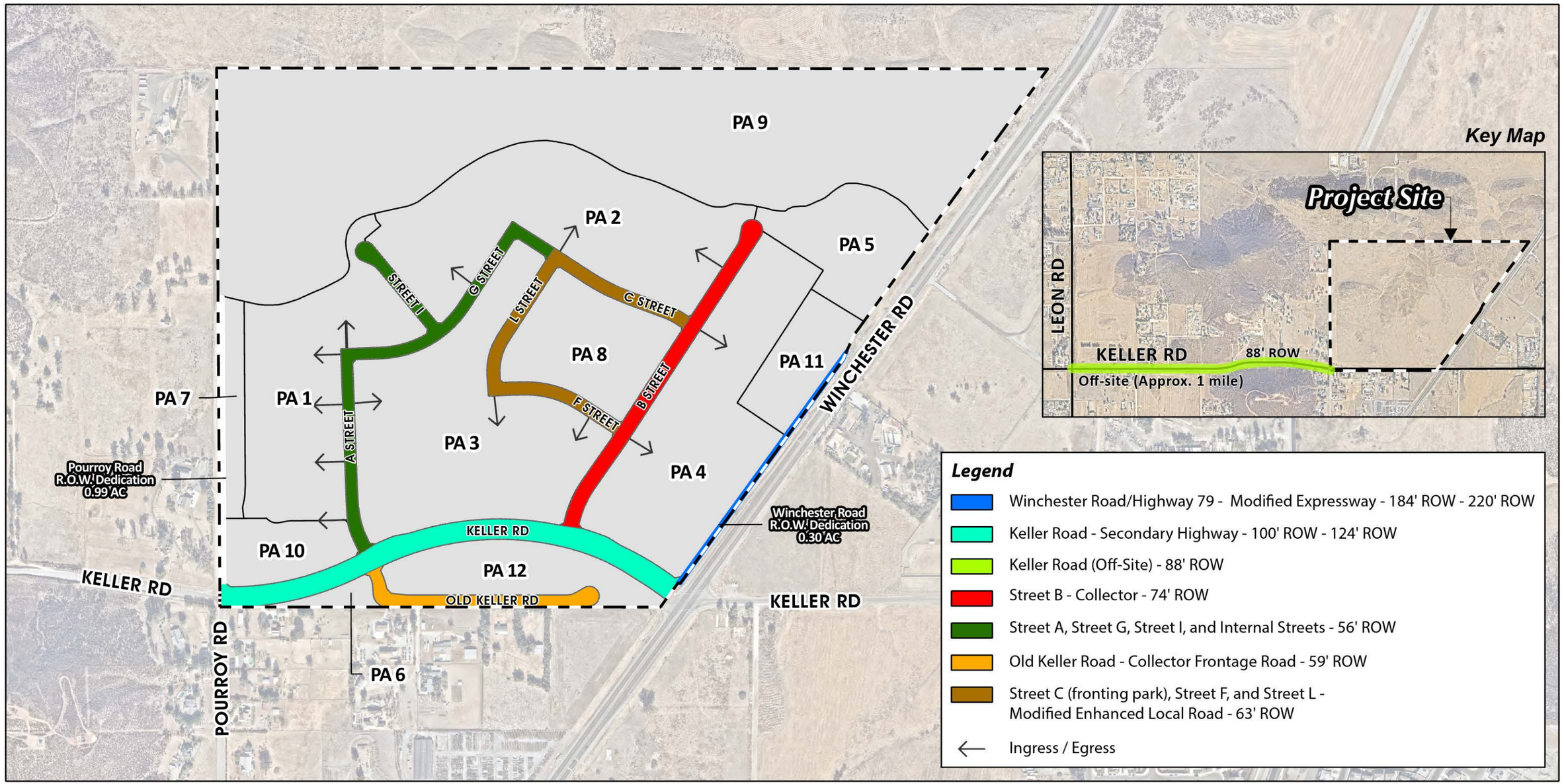
- **Open Space – Water (OS-W):** SP 380A1 would designate a total of approximately 16.00 acres across Planning Areas (PAs) 10, 11, and 12 for stormwater management purposes. These areas would include detention basins designed to capture, temporarily detain, and convey stormwater runoff generated by the Project. In addition to flood control, the basins would provide water quality treatment functions, including the removal of water-borne pollutants, prior to discharge from the Project site.

- **Open Space – Conservation (OS-C):** SP 380A1 would designate approximately 3.49 acres within PAs 6 and 7 as OS-C. This area consists of narrow, irregularly shaped slivers of land intended to remain undeveloped to serve as visual buffers, natural landform preservation, and transitional zones between residential and open space uses. The OS-C designation ensures that these areas are maintained in a permanent open condition, supporting community aesthetics, passive environmental functions, and consistency with applicable land use policies. No development or active recreational use is proposed within PAs 6 or 7.

- **Circulation:** SP 380A1 would accommodate the construction of approximately 18.89 acres of roadway infrastructure, including Right-of-Way (ROW) dedications for Winchester Road, Keller Road, Pourroy Road, and an internal network of local streets. Internal circulation would be provided via Streets A, B, C, F, G, I, and L, which would connect individual planning areas to the external roadway network, while Old Keller Road would continue to provide vehicular access to the existing residences located south of the Project site. The circulation system has been designed to provide safe and efficient access for vehicles, pedestrians, and emergency services throughout the Project site.

### B. Proposed Roadway Master Plan

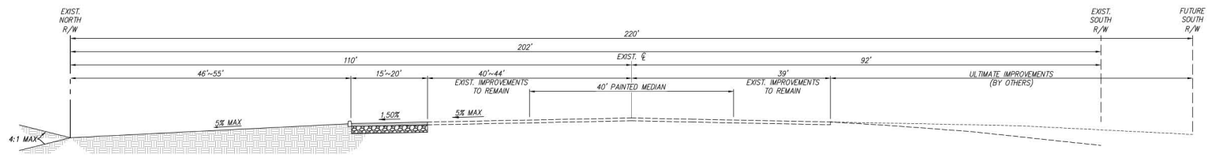
Proposed SP 380A1 includes a Roadway Master Plan, which is depicted on Figure 3-3, Conceptual Vehicle Circulation Plan. Proposed roadway cross-sections are illustrated on Figure 3-3 through Figure 3-5, *Proposed Roadway Cross-Sections*. As shown, primary vehicular access to the Project site would be provided via Keller Road along the southern boundary and Winchester Road (State Route 79) along the eastern boundary. Internal access would be accommodated by a network of proposed streets, including



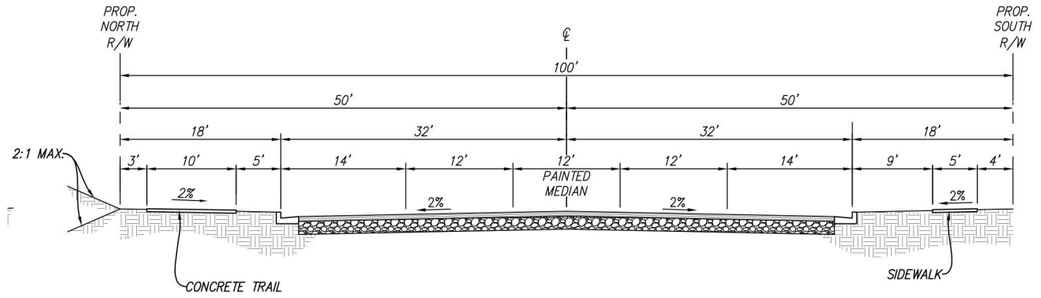

Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.; RTM Engineering Consultants (01-22-2026)

Figure 3-3

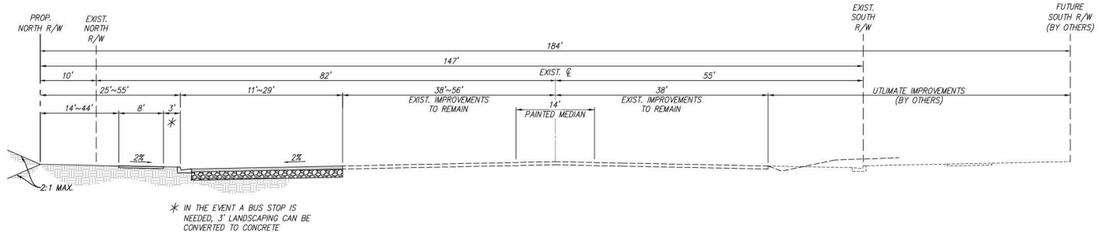
Conceptual Vehicle Circulation Plan



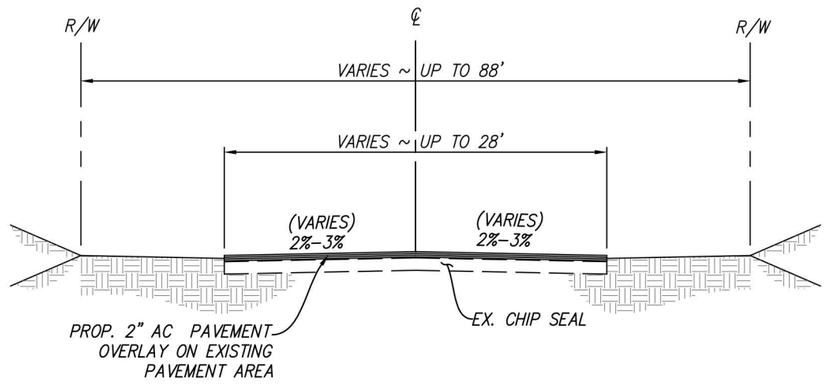

**EXPRESSWAY (220' ROW)**
**WINCHESTER ROAD**
**STD. NO. 82, MODIFIED**
**From 1/2 Mile North of Keller Road to Project Boundary**




**SECONDARY HIGHWAY (100' ROW)**
**KELLER ROAD**
**STD. NO. 94, MODIFIED**




**EXPRESSWAY (184' ROW)**
**WINCHESTER ROAD**
**STD. NO. 83, MODIFIED**
**From Keller Road to 1/2 Mile North of Keller Road**



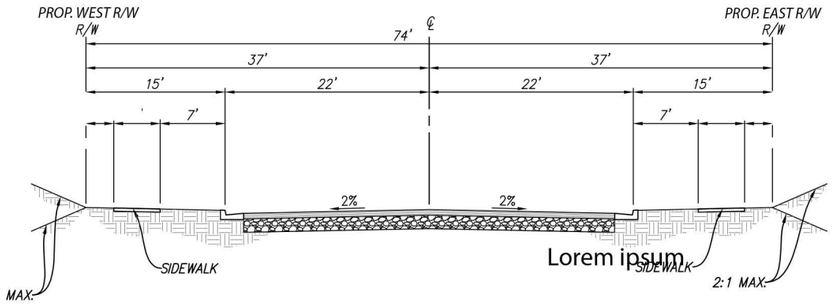

**KELLER RD (88' ROW)**
**From Pourroy Rd to Leon Rd (Off-site)**

Source(s): RTM Engineering Consultants, 2026

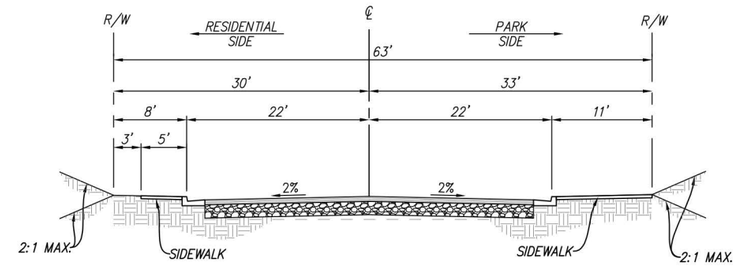
Figure 3-4

Not to Scale

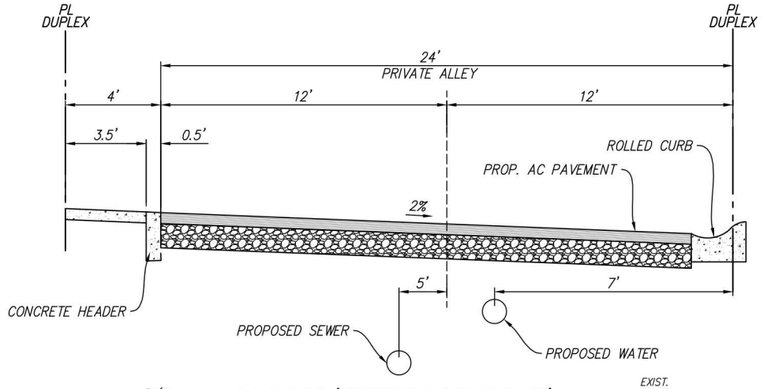
Proposed Roadway Cross-Sections (1 of 2)



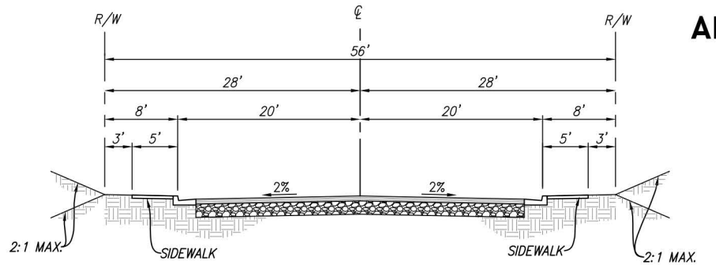

**COLLECTOR (74 ROW)**
**STREET B**
**STD. NO. 103**



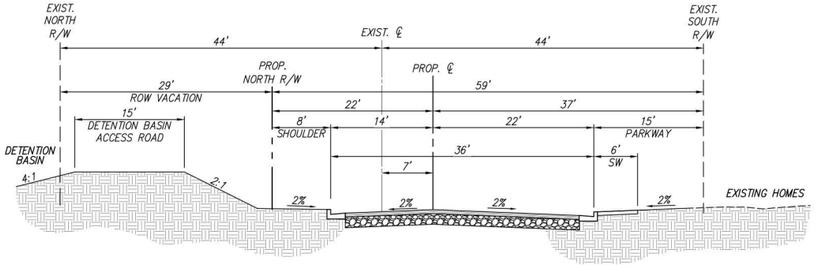

**MODIFIED LOCAL STREET (63' ROW)**
**STREET C (FRONTING PARK), STREET F, AND STREET L**
**STD. NO. 105, MODIFIED**




**ALLEY (WIDTH VARIES)**
**PLANNING AREA 4**




**LOCAL STREET (56' ROW)**
**STREET A, STREET C, STREET G, AND INTERNAL STREETS**
**STD. NO. 105, SECTION A (MODIFIED)**




**COLLECTOR FRONTAGE ROAD (59' ROW)**
**OLD KELLER ROAD**
**STD. NO. 107A, MODIFIED**

Source(s): RTM Engineering Consultants, 2026

Figure 3-5

Not to Scale

Proposed Roadway Cross-Sections (2 of 2)

Streets A, B, C, F, G, I, and L, which would provide access to individual residential neighborhoods and the community park. These streets would connect to external roadways and form the backbone of the Project's internal circulation system. The Roadway Master Plan includes a hierarchical network of internal streets designed to facilitate efficient circulation while promoting safety and walkability. Intersections and roadway alignments have been planned to balance vehicular access with neighborhood livability, using standard local street configurations that provide access to each Planning Area.

- **Winchester Road/Highway 79 – Modified Expressway (½-Width 92'-122' ROW, 184'-220' Total ROW):** Winchester Road/Highway 79 is classified in the County General Plan and the Southwest Area Plan (SWAP) as a "Modified Expressway" with an ultimate right-of-way (ROW) width ranging from 184 to 220 feet. Two roadway cross-sections are proposed for Winchester Road along the Project frontage. For the segment between Keller Road and 0.5-mile north of Keller Road, Winchester Road would be improved along the western side of the roadway to include up to 29 feet of paving, and up to 55 feet of landscaped parkway, which would include a 3-foot curb-adjacent landscaped parkway, an 8-foot-wide curb-separated sidewalk, and up to 44 feet of landscaped parkway at the edge of the right-of-way, along with the dedication of 10 feet of right-of-way. If requested by the Riverside Transit Agency (RTA), a portion of Winchester Road north of its intersection with Keller Road along the Project site's frontage would be designed to accommodate a bust stop, which would replace the 3-foot-wide curb-adjacent landscaped strip with sidewalk in order to accommodate a total 11-foot-wide curb-adjacent sidewalk that is designed to meet Americans with Disabilities Act (ADA) standards. For the segment of Winchester Road from approximately 0.5-mile north of Keller Road to the northern Project boundary, the western side of the roadway would be improved to include up to 55 feet of curb-adjacent landscaped parkway and up to 20 feet of additional paving. Ultimate improvements to the easterly side of both portions of Winchester Road would be completed in the future by others.

- ***Keller Road – Modified Secondary Highway (100'-112' ROW):*** Keller Road is classified by the County General Plan and SWAP as a "Secondary Highway" with an ultimate right-of-way (ROW) width of 100 to 112 feet. As part of the Project, Keller Road would be slightly realigned to the north through the southern portion of the site to create a 90-degree intersection with Winchester Road/Highway 79. A ROW dedication of 100 feet would be provided along the segment that traverses the Project site. Improvements would include 64 feet of paving (including a 12-foot-wide painted median) and 18-foot-wide parkways on both sides. The northern parkway would include a 10-foot-wide curb-separated meandering concrete trail, while the southern parkway would include a 5-foot-wide curb-separated sidewalk. At the intersection with Winchester Road, the ROW may increase to 112 feet and consist of up to 76 feet of paving to accommodate turn lanes. In addition, as part of the Project, the portion of Keller Road between Leon Road and the western Project boundary would be improved to include up to 28 feet of travel lanes within the existing ROW.

- **Collector Road (74' ROW) – Street B:** Street B would be classified as a Collector Road and would serve as the primary north–south circulation route through the Project site. A total of 74 feet of right-of-way would be dedicated, and this roadway would be improved to include 44 feet of paving (curb-

to-curb) and 15-foot-wide parkways on both sides, each with a 5-foot-wide curb-separated sidewalk. Street B would provide access to Planning Areas 2, 3, 4, 5, 8, and 11.

- **Modified Enhanced Local Roads (63' ROW) – Streets C, F, and L:** Proposed Streets C, F, and L are proposed as Modified Enhanced Local Roads and would provide enhanced pedestrian access to the proposed park site within PA 8. These roadways would be improved to include 44 feet of travel lanes, an 11-foot-wide curb-adjacent sidewalk for the side of the road abutting the park, and an 8-foot-wide parkway along the other side of the roadway that would include a five-foot-wide curb-adjacent sidewalk.

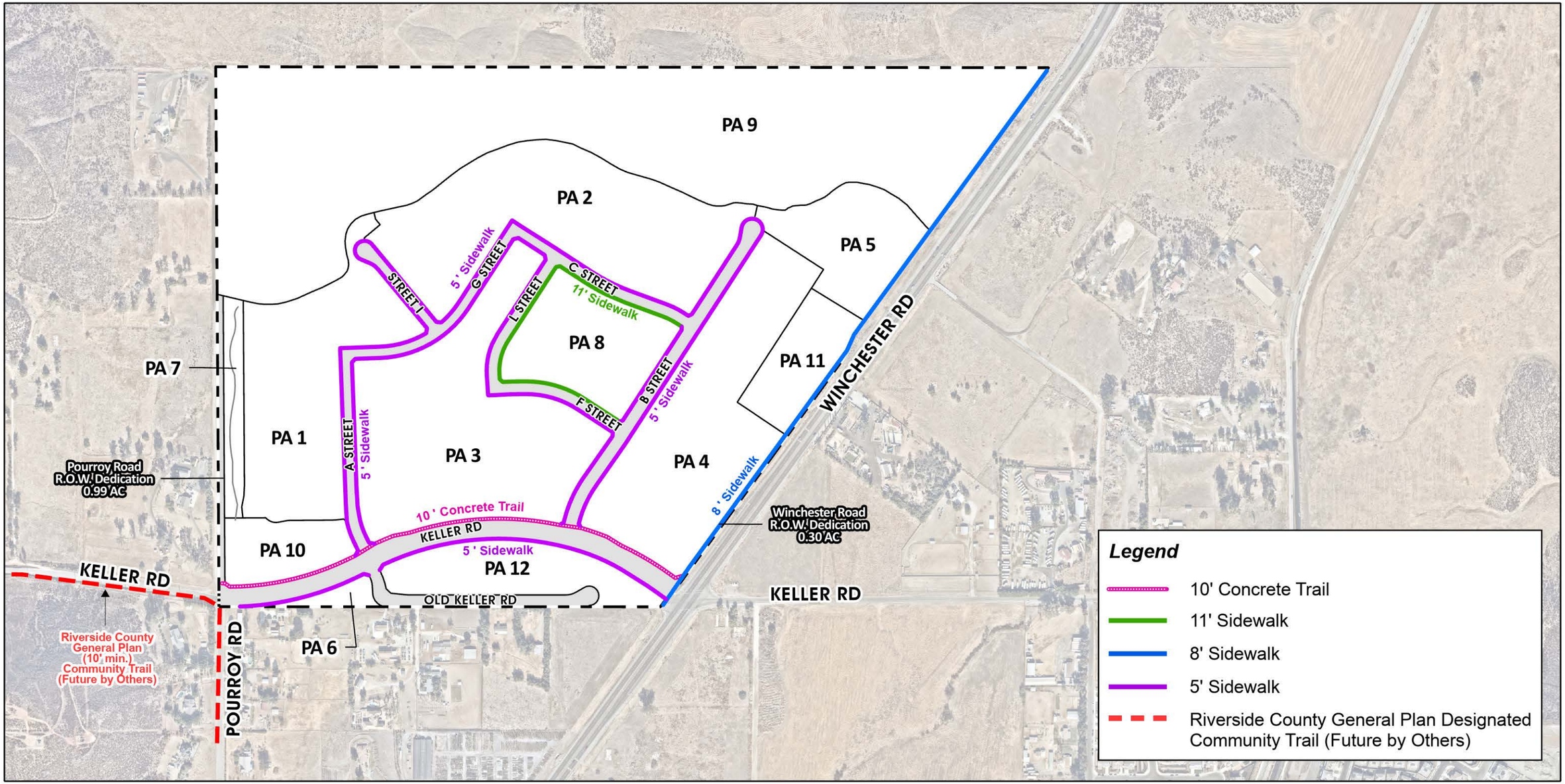
- **Modified Collector Road (59' ROW) – Old Keller Road**: Old Keller Road would be slightly reconfigured to accommodate the proposed realignment of Keller Road through the Project site and to ensure continued vehicular access to the existing residences along the southern side of the existing Keller Road. As part of the Project, the northerly portion of the Old Keller right-of-way (29 feet) would be vacated and reduced to 22 feet, and would include 14-feet of paving (curb to curb) north of the centerline and an 8-foot-wide shoulder at the edge of the right-of-way. The southerly portion of the right-of-way (44 feet) would be reduced to 37 feet, and would include 22 feet of paving (curb to curb) south of the centerline and a 6-foot-wide curb-adjacent sidewalk within a 15-foot-wide parkway.

- **Local Streets (56' ROW) – Streets A, C, G, and Internal Local Streets:** Streets A, C, G, and all other internal local streets would be improved as part of the Project to provide internal connectivity within the site. As part of the Project, a total of 40 feet of paved travel lands would be accommodated, along with 8-foot-wide parkways along both sides of the road that would include five-foot-wide curb-adjacent sidewalks.

- **Alleys (30' ROW)**: It is anticipated that the HDR units within PA 4 would be constructed in a configuration that would include alleys. These alleys would consist of a minimum of 30 feet in width, with minimum 5-foot-wide curb-adjacent sidewalks along each sides of the alleyway.

### C. Conceptual Pedestrian Circulation Plan

Proposed SP 380A1 includes a Conceptual Pedestrian Circulation Plan, as depicted on Figure 3-6, *Conceptual Pedestrian Circulation Plan*. Pedestrian circulation within the Project site would be accommodated through a network of sidewalks and multi-use trails. Sidewalks throughout the Project would range in width from 5 feet to 11 feet, depending on street type and context. A 10-foot-wide meandering concrete trail would be provided along the north side of Keller Road. The pedestrian circulation system has been designed to provide connectivity between residential neighborhoods and to the central park in PA 8.




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.; RTM Engineering Consultants (01-22-2026)

Figure 3-6

Conceptual Pedestrian Circulation Plan

### D. Drainage and Water Quality Improvements

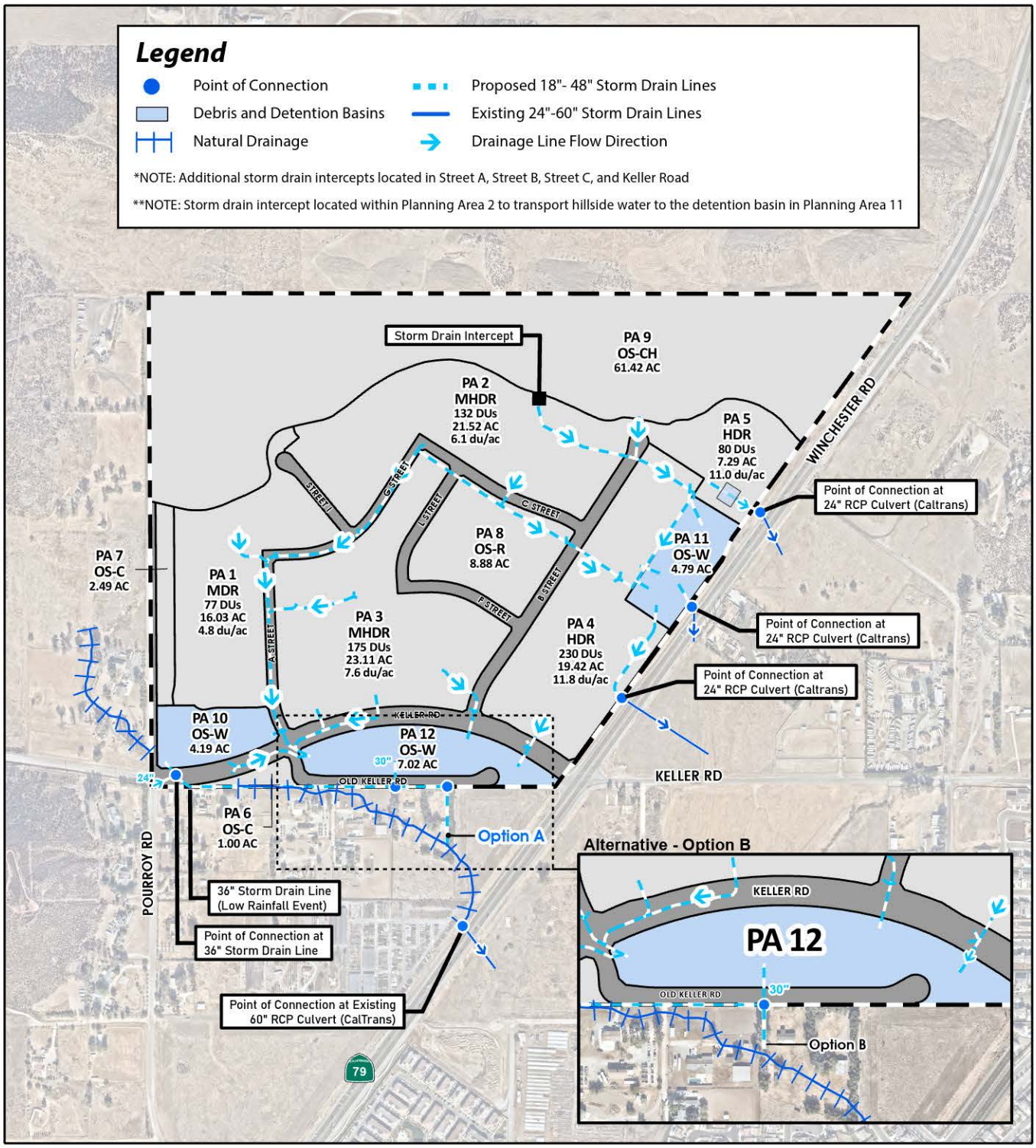
The Project site is located within the Santa Margarita Watershed Management Area of Riverside County, with runoff in the Project area ultimately being discharged into the Santa Margarita River in Temecula. The natural topography of the Project site drains from the northwest to southeast. In addition, the Project site is tributary to off-site drainages, including off-site areas west of Pourroy Road, south of (Old) Keller Road, and along Winchester Road. A major drainage course, west of Pourroy Road, conveys a significant tributary area runoff from the northern and western hillside elevations, and continues southeast into Winchester Road via several Caltrans RCP culverts. Existing drainage water courses also flow offsite from the northern and eastern hillside elevations through several existing Caltrans reinforced concrete pipe (RCP) culvert-under-crossings along Winchester Road (SR-79).

As shown on Figure 3-7, *Conceptual Drainage and Water Quality Plan,* a comprehensive storm drain system is proposed as part of the Project that has been designed to convey the 100-year storm event under the ultimate buildout condition. As shown, runoff generated on site and that is tributary to the site would be conveyed via a series of storm drain lines ranging in size from 18 to 38 inches that ultimately would discharge into proposed water quality management and detention and debris basins in Planning Areas 5, 10, 11, and 12, which ultimately would discharge flows into their respective existing pre-development water courses.

In the northeastern portion of the site, drainage flows from PA 5 would be treated and detained within a proposed water quality basin that would be constructed within PA 5. Hillside storm flows from the open space proposed within PA 8 would be intercepted and conveyed through a bypass storm drain line directly into a basin in PA 11, which also would treat and detain storm flows and run-off from portions of PA 2. Additionally, flows from the park in Planning Area 8 would be treated via landscaping and remaining flows would be conveyed into the basin proposed in PA 11. Outflows from the basins in PA 5 and PA 11 would be conveyed through 24-inch storm drain lines to three points of connection with the existing Caltrans 24-inch Reinforced Concrete Pipe (RCP) culverts under Winchester Road, and ultimately would be discharged off-site to a major natural drainage course southeast of the Project site.

The basin proposed within PA 12 at the southern edge of the Project site would capture flows from PAs 1 through 4, where the flows would then be conveyed south via a 30-inch storm drain line under Old Keller Road, and ultimately would discharge via Option A or Option B into an existing natural drainage course located south of Old Keller Road.

A debris basin within PA 10 would capture offsite flows and sediment from the north and west. During low rainfall events, a 36-inch storm drain would capture the flows from the debris basin in PA 10 and would convey these flows under Keller Road, and then back into the natural drainage course south of Old Keller Road. Additionally, flows from Keller Road and Pourroy Road would be conveyed through a 24-inch storm drain line to a point of connection at the 36-inch storm drain line, which would convey flows easterly to a 30-inch storm drain line where one of two options may occur (Options A and B). Under Option A, a 30-inch storm drain line would extend east under Old Keller Road and then south within an easement along the




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.; RTM Engineering Consultants (01-22-2026)

Figure 3-7

Conceptual Drainage and Water Quality Plan

private property's eastern property line, which would then convey flows into the natural drainage course south of Old Keller Road. Under Option B, a 30-inch storm drain line would extend east under Old Keller Road, and then south within an easement along the private property's western property line, which would then convey flows to the natural drainage course south of Old Keller Road.

Finally, the natural drainage course receiving flows from PA 10 and PA 12 would be preserved in its predevelopment alignment until the drainage course discharges into the existing 60-inch RCP under Winchester Road, which would then conveys flows into a major natural drainage course southeast of the Project site.

## E. Master Water Plan

### *1. Domestic Water Plan*

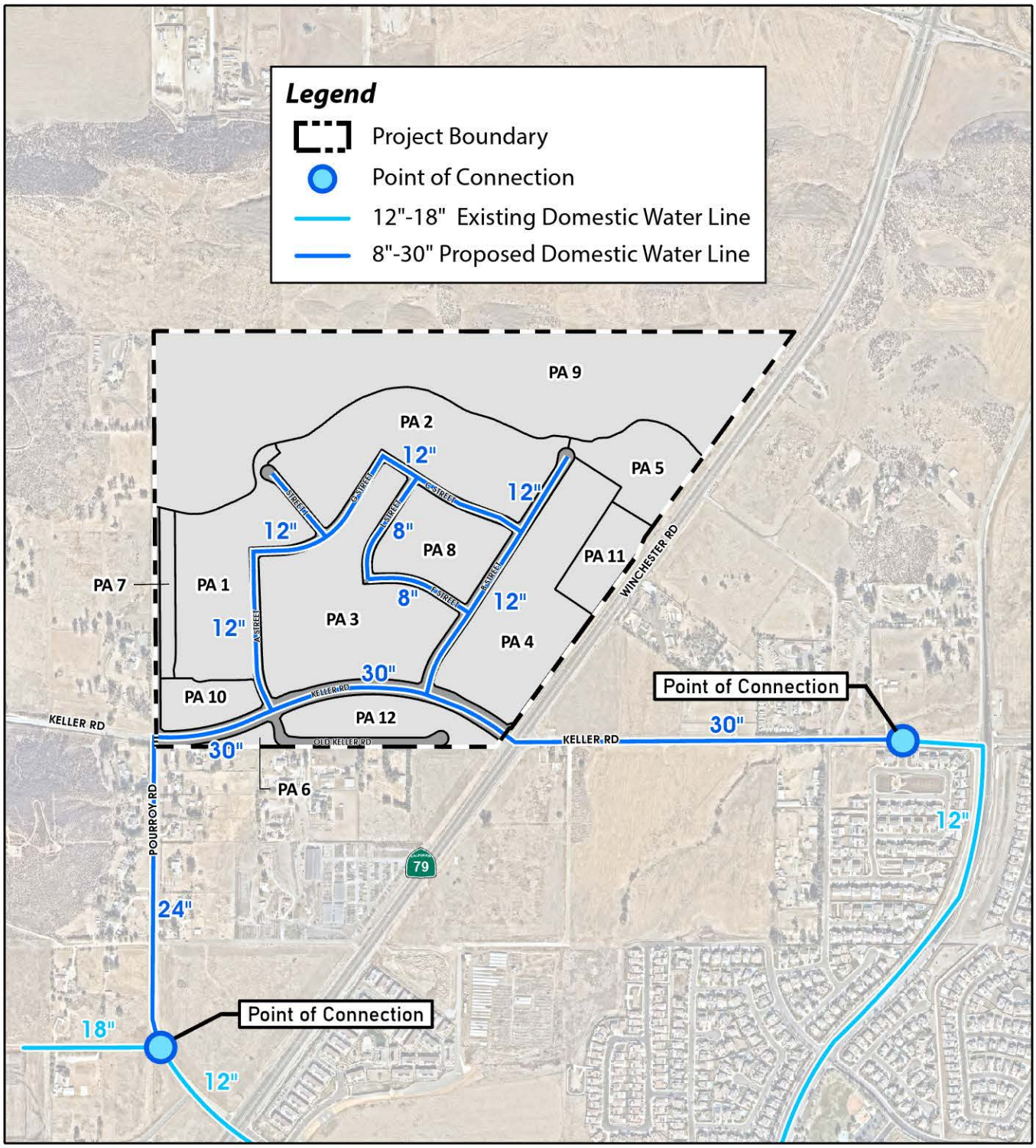
Potable water service for the Project would be provided by the Eastern Municipal Water District (EMWD) through the 1627 Pressure Zone water system. As shown on Figure 3-8, *Conceptual Domestic Water Plan,* existing 18-inch and 12-inch water transmission lines occur within Ruft Road and Pourroy Road, respectively, while an additional 12-inch water transmission line occurs within Keller Road approximately 0.1-mile west of its intersection with Washington Street. As part of the Project, a new 24-inch water line would be installed within Pourroy Road between Ruft Road and Keller Road, while a 30-inch water main is proposed be installed in Keller Road between Pourroy Road and the existing point of connection within Keller Road near Washington Street. Water service on site would be provided by a series of 8- and 12-inch water lines that would extend within the major and local roadways on site. The onsite system would serve domestic water needs, landscape irrigation (including for individual homeowners and common areas), and fire protection demands.

### *2. Recycled Water Plan*

A recycled water system is proposed to provide irrigation for the Project's park, common area landscaping, manufactured slopes, and detention basin areas. Recycled water would be supplied by Eastern Municipal Water District (EMWD) via connection to an existing 24-inch recycled water line located in Leon Road, approximately one mile west of the Project site. As shown on Figure 3-9, *Conceptual Recycled Water Plan*, a 12-inch recycled water main would be installed within Keller Road between Leon Road and the eastern side of the Keller Road/Winchester Road intersection. The on-site recycled water system would connect to this proposed recycled water main within Keller Road, and a series of on-site 8-inch recycled water lines would be extended throughout the Project site to provide a looped distribution system.

## F. Sewer Plan

Sewer service for the proposed Project also would be provided by the EMWD. As shown on Figure 3-10, *Conceptual Sewer Plan,* under existing condition there is an 18-inch sewer main located within Abelia Street immediately southwest of its intersection with Winchester Road. As part of the Project, a series of 8- to 12-inch sewer lines would be installed within the on-site roadways, which would convey sewer flows westerly within Keller Road and southerly within Pourroy Road to the existing point of connection within Abelia Street.

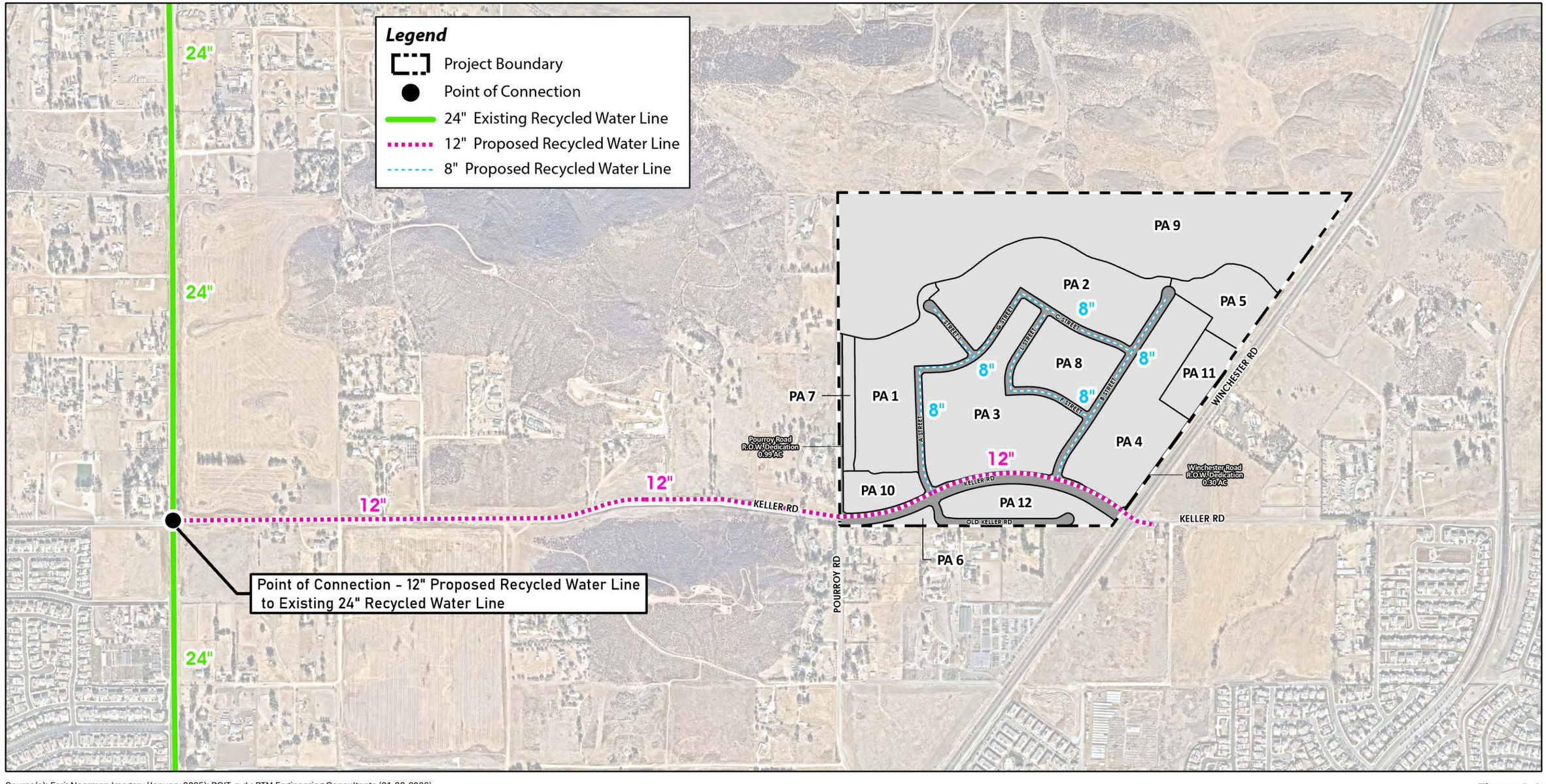



Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.; RTM Engineering Consultants (01-22-2026)

Figure 3-8

0 237.5 475 950 Feet

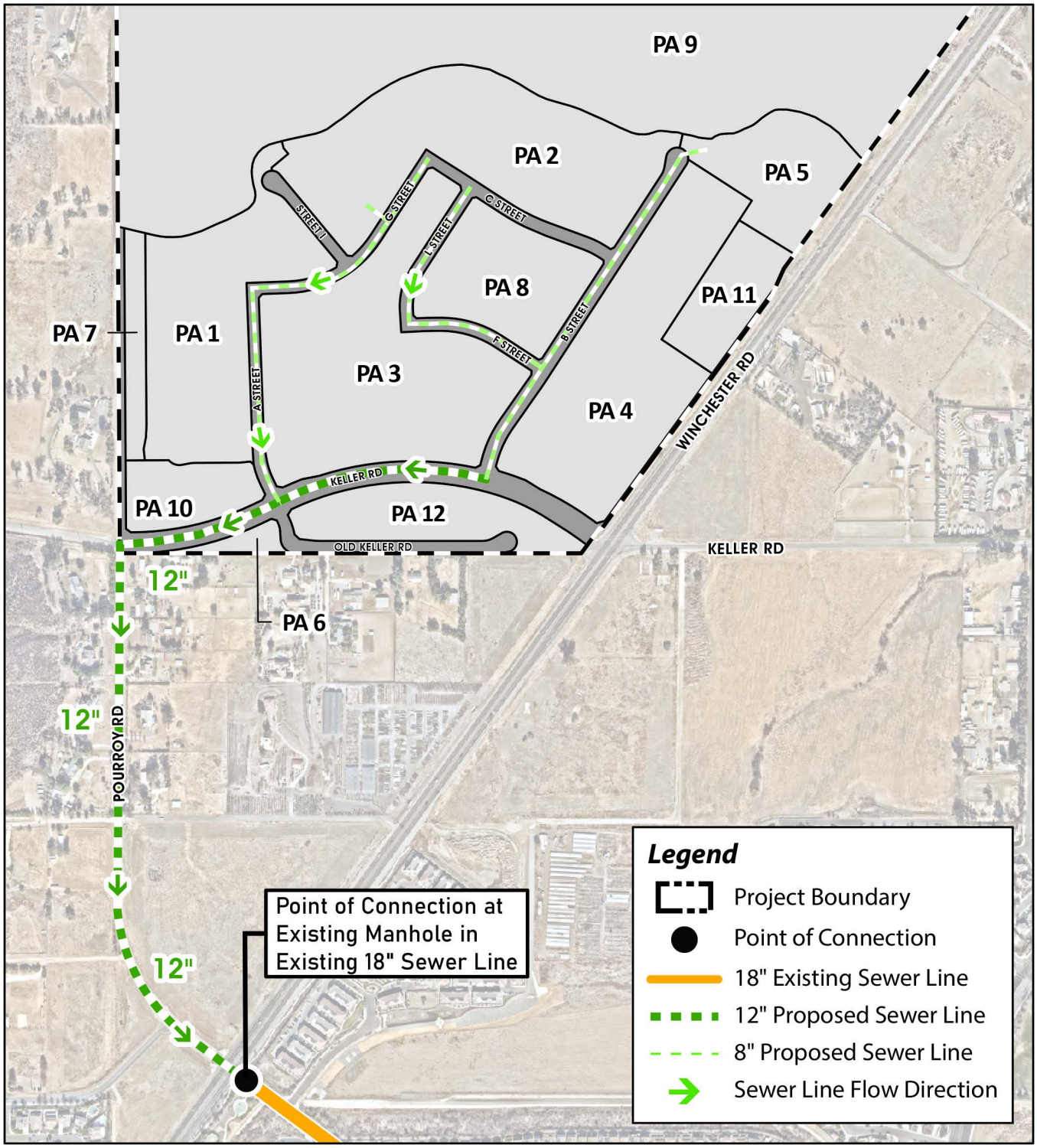
Conceptual Domestic Water Plan




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.; RTM Engineering Consultants (01-22-2026)

Figure 3-9

Conceptual Recycled Water Plan




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.; RTM Engineering Consultants (01-22-2026)

Figure 3-10

0 175 350 700 Feet

Conceptual Sewer Plan

### G. Grading Plan

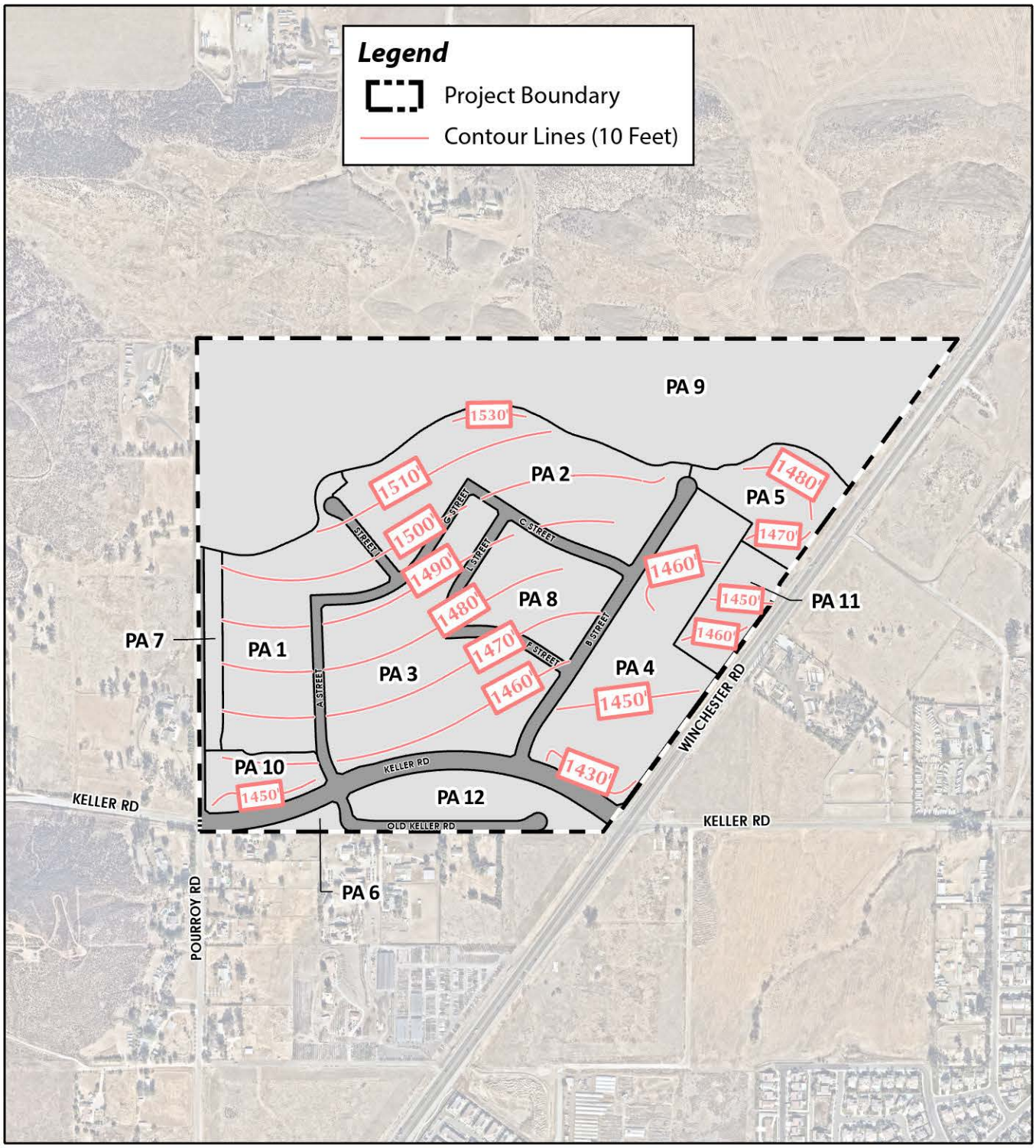
Development of the Project would involve re-contouring the pre-development terrain of the site to create building pads, roads, and infrastructure, sloping from the higher northerly elevations toward the lower southern and southeastern portions of the site. As shown on Figure 3-11, *Conceptual Grading Plan*, the grading would consist of standard residential grading for the single-family and higher-density residential neighborhoods, construction of water quality and stormwater detention basins in PAs 10, 11, and 12, and minor contouring for the development of recreational amenities in PA 8. The grading generally would follow existing drainage patterns and is designed to achieve a nearly balanced condition, with rough cut and fill quantities estimated at approximately 1.2 million cubic yards (cy). It is anticipated that earthwork would be balanced on site with no import or export of soil required.

It is anticipated that grading of the Project site would occur in two separate phases. The first phase of grading would include the southern and central portions of the Project site, including portions of the residential Planning Areas 1, 3, and 4; the Open space area in Planning Area 6; the landscaped buffer in Planning Area 7; the debris basin in Planning Area 10; the WQMP basins in Planning Area 11 and Planning Area 12; and grading to accommodate Keller Road, Street "B", Street "F", a segment of Street "A", and internal neighborhood roads. The second phase of grading would include the northern portion of the Project site, including residential Planning Areas 2 and 5 and a portion of residential Planning Areas 1, 3, and 4; the public park in Planning Area 8; and roadways including Old Keller Road, Street "C", Street "G", Street "I", Street "L", internal neighborhood roads, and a segment of Street "A."

### H. Fuel Modification Plan

SP 380A1 includes a Fuel Modification Plan (FMP) (*Technical Appendix N*) that has been reviewed and approved by the Riverside County Fire Department. As shown in Figure 3-12, *Conceptual Fuel Modification Plan,* the FMP includes a series of fuel modification zones throughout the Project site intended to reduce wildfire risk and enhance defensible space in compliance with California Fire Code and Riverside County Fire Department standards. Fuel modification zones within the Project site would occur within all residential Planning Areas, as well as in Planning Areas 10, 11, and 12 where they abut residential development areas. Fuel modification area planting would be in accordance with the Riverside County Fire Department standards and requirements and would consist of appropriate plant materials and irrigation treatments. Lots that are within Planning Areas adjacent to open space would be developed in accordance with the FMP to provide adequate buffering and fuel modification zones consistent with Riverside County Fire Department standards. Fuel modification zones would be provided where the conditions outlined below exist, as per Riverside County Fire Department standards.

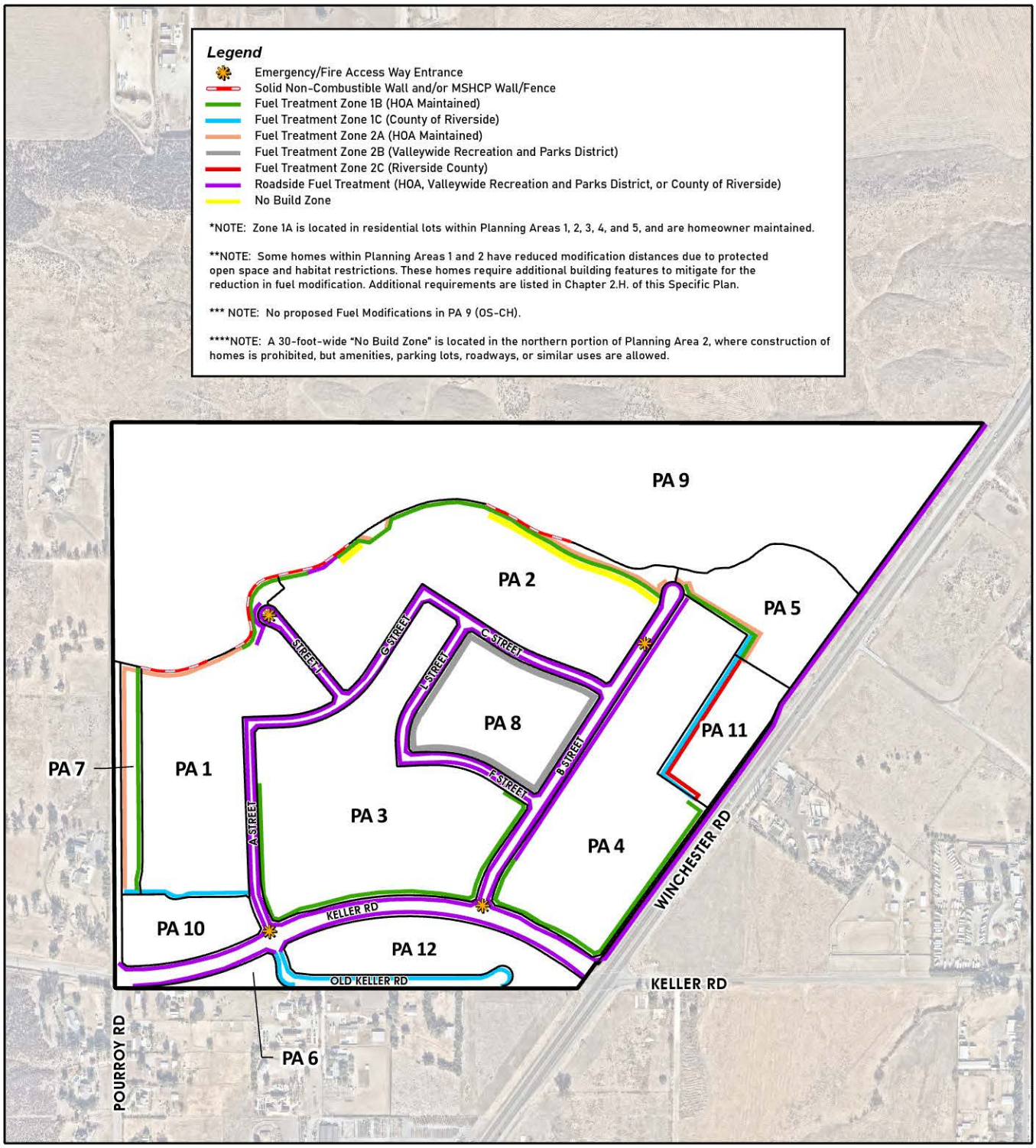
In order to adequately protect structures adjacent to open space areas and the MSHCP-dedicated hillsides, sufficient "defensible space" must be accommodated between the dwelling and the fuel associated with the open land. A total of 100 feet of fuel modification treatment would be required via Fuel Modification Zones 1A, 1B, 1C, 2A, 2B, and 2C. In those areas where 100 feet of fuel modification zones cannot be achieved due to open space protection issues or property boundary limitations, alternative protection




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.; RTM Engineering Consultants (01-22-2026)

Figure 3-11

Conceptual Grading Plan




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.; RTM Engineering Consultants (03-14-2026)

Figure 3-12

Conceptual Fuel Modification Plan

measures would be implemented to help protect the homes from wildfire. These protection measures would be based on worst case scenarios (slope, wind, native vegetation, fuel moisture, humidity, etc.) and fire fuel modeling. The affected lots may include measures consist of a combination of fuel modification and required ignition resistant construction, as well as additional construction feature requirements.

As shown on Figure 3-12, three separate Fuel Modification Zones (FMZ) within the Project site. All FMZ distances are measured horizontally. Fuel Modification Zones 1A, 1B, 1C, 2A, 2B, and 2C would be sufficient to mitigate direct flame contact and the radiant heat effects of a worst-case wildland fire with 5.3-foot to 8.5-foot flame lengths. A description of the proposed FMZs is provided below.

- **Fuel Modification Zone 1A:** Zone 1A would consist of a homeowner-maintained zone within individual lots and shall be free of all combustible construction and materials. Zone 1A generally would be located within the rear yard and side yards of the homes within all residential Planning Areas. It would consist of an irrigated zone surrounding the building pad and would be measured from the exterior walls of the building or from the most distal point of a combustible projection or an accessory structure within 10 feet of the main building to the lot boundary. This distance area would provide the best protection against the high radiant heat produced by wildfire and also would provide 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 and minimum 10-foot setbacks between buildings and trees. Landscaping in this zone would be restricted in accordance with Table 4-1, Community Plant Palette, and Table 4-2, Prohibited Plant List, in Chapter 4 of the proposed SP00380A01.

- **Fuel Modification Zone 1B:** Fuel Modification Zone 1B would be maintained by the Homeowner's Association (HOA), and would consist of planted and maintained common areas, as well as irrigated and fire-resistant landscaping and manufactured slopes that would extend from residential property lines. Zone 1B generally would be located in landscaping areas outside of homeowner lots, including in Planning Areas 1, 2, and 5, starting from the lot parcel line extending 30 feet outwards, within parks, roadway landscaping, and manufactured slopes. This zone would be planted with fire resistant shrubs, trees, and groundcovers and would be irrigated year-round. Landscaping in this zone would be restricted in accordance with Table 4-1, Community Plant Palette, and Table 4-2, Prohibited Plant List, in Chapter 4 of the proposed SP00380A01.

- **Fuel Modification Zone 1C:** Fuel Modification Zone 1C would be maintained by the Valley-Wide Recreation and Park District or the County of Riverside. Zone 1C generally would be located within and around the basins in Planning Areas 10, 11, and 12. This zone would be planted with fire resistant shrubs, trees, and groundcovers and shall be irrigated year-round. Landscaping in this zone would be restricted in accordance with Table 4-1, Community Plant Palette, and Table 4-2, Prohibited Plant List, in Chapter 4 of the proposed SP00380A01.

- **Fuel Modification Zone 2A:** Fuel Modification Zone 2A would be maintained by the HOA or other similar entity and would consist of thinning treatment to ensure that areas in this zone would contain

50% open space and are free of any dead and dying combustible vegetation. Zone 2A generally would begin at the outer edge of Zones 1A, 1B, and 1C landscaping and would include Planning Areas 1, 2, 5, and 7. This zone would consist of a non-irrigated area that must be maintained yearly prior to fire season to clear out any dead, dying, and invasive material. Landscaping in this zone would be restricted in accordance with Table 4-1, Community Plant Palette, and Table 4-2, Prohibited Plant List, in Chapter 4 of the proposed SP00380A01.

- **Fuel Modification Zone 2B:** Fuel Modification Zone 2B would be maintained by the Valley-Wide Recreation and Park District or the County of Riverside. Zone 2B generally would be located within the Park in Planning Area 8. This zone would be planted with fire resistant shrubs, trees, and groundcovers and would be irrigated year-round. Landscaping in this zone would be restricted in accordance with Table 4-1, Community Plant Palette, and Table 4-2, Prohibited Plant List, in Chapter 4 of the proposed SP00380A01.

- **Fuel Modification Zone 2C:** Fuel Modification Zone 2C would be maintained by the Valley-Wide Recreation and Park District. Zone 2C generally would be located within and around the basin in Planning Area 11. The outer edge of this zone would be 100 feet from any structure. This zone would be planted with fire resistant shrubs, trees, and groundcovers and shall be irrigated year-round. Landscaping in this zone would be restricted in accordance with Table 4-1, Community Plant Palette, and Table 4-2, Prohibited Plant List, in Chapter 4 of the proposed SP00380A01.

- **Roadside Fuel Treatment:** Roadside fuel treatment would be managed by the HOA, and includes all public roads, which shall have a minimum of 20 feet of combustible vegetation clearance on each side of the roadway. Sidewalks and related non-combustible improvements are encouraged in fuel treatment areas to enhance the level of protection. Landscaping in this zone would be restricted in accordance with Table 4-1, Community Plant Palette, and Table 4-2, Prohibited Plant List, in Chapter 4 of the proposed SP00380A01.

- **Additional Building Features:** Additional building features are required for a few homes within residential Planning Areas 1 and 2, because they do not meet the minimum 100-foot fuel treatment setback. For any home or building that has reduced fuel modification distances, a separate fencing plan would be required and may require solid non-combustible walls to limit any actual radiant fire that may start in the conservation habitat area. Homes on these lots would be required to be consistent with the recommendations outlined in the Project's Fire Protection Plan. Landscaping in this zone would be restricted in accordance with Table 4-1, Community Plant Palette, and Table 4-2, Prohibited Plant List, in Chapter 4 of the proposed SP00380A01.

### I. Proposed Keller Crossing Specific Plan Design Guidelines

Proposed SP 380A1 also includes Design Guidelines related to site planning, architecture, lighting, signage, and landscape/hardscape design. The Design Guidelines are intended to allow for flexibility for future implementing developments while providing standards to help ensure the site is developed in a manner

consistent with the development quality, character, and theme as described by SP 380A1. Future implementing developments would be reviewed by the County for compliance with the Design Guidelines section of SP 380A1. Refer to Chapter 4 of proposed SP 380A1 for the specific design standards that would apply to future development.

### 3.5.4 Tentative Tract Map No. 38163

As shown on Figure 3-13, *Tentative Tract Map 38163*, and summarized in Table 3-2, *Tentative Tract Map 38163 Land Use Summary,* TTM 38163 would subdivide the approximately 196.1-acre Project site consistent with the land use plan proposed under Specific Plan Amendment SP 380A1. TTM 38163 proposes a total of 694 residential dwelling units distributed across five residential planning areas, including 77 Medium-Density Residential (MDR) units in Planning Area 1, 132 MDR units in Planning Area 2, 175 Medium-High-Density Residential (MHDR) units in Planning Area 3, 230 High-Density Residential (HDR) fee simple lots in Planning Area 4, and 80 age-restricted HDR units in Planning Area 5. The map also includes numerous lots for open space (recreation, conservation, and water quality), internal roadways, and supporting infrastructure. A detailed description of the proposed land uses under TTM 38163 is provided below.

**Table 3-2 Tentative Tract Map 38163 Land Use Summary**

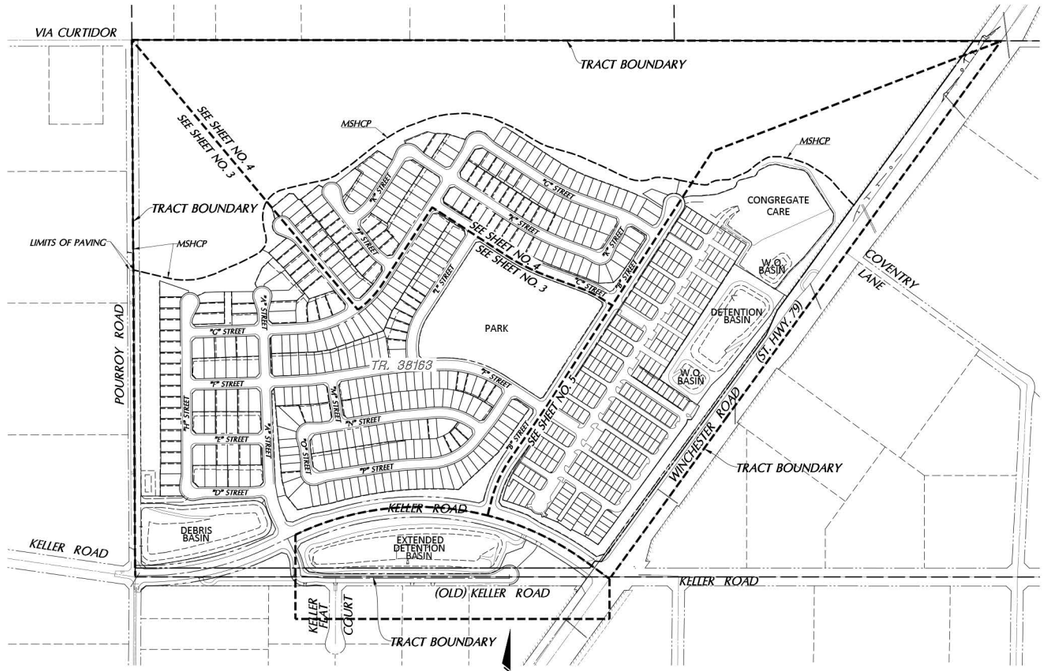
| Land Use | Lot Numbers | Acreage |
|---|---|---|
| Single Family Residential (MDR and MHDR) | Lots 1-384 | 41.46 |
| High Density Residential (HDR) | Lots 385-614 | 10.65 |
| Open Space – Recreation (OS-R) | Lot 620 | 8.88 |
| Open Space – Conservation Habitat (OS-CH) | Lot 615 | 61.42 |
| Detention Basins | Lots 629, & 632-635 | 13.50 |
| Open Space – Conservation (OS-C) and Open Space lots | Lots 616-619 & 621-631 | 20.76 |
| Private Alleys | N/A | 4.91 |
| Roadways | N/A | 34.47 |
| **Totals:** | **--** | **196.05** |

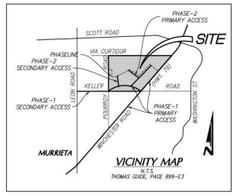
- **Single Family Residential.** TTM 38163 proposes to subdivide the property to provide a total of 384 single-family residential lots across approximately 41.46 acres. These lots are distributed within Planning Areas 1 through 3, corresponding to the Medium Density Residential (MDR) and Medium High Density Residential (MHDR) land use designations of SP 380A1. Lot sizes would vary, typically ranging from 5,000 to 7,000 square feet, with a mix of traditional and compact lot configurations to support a range of housing types and densities. Internal street access to these residential areas would be provided via proposed Streets B, C, D, E, F, and G.

- **Multi-Family Residential.** TTM 38163 proposes a total of 310 High Density Residential (HDR) units within Planning Areas 4 and 5 of SP 380A1. Planning Area 4 would accommodate 230 units on 10.65 acres, likely configured as small-lot or attached homes consistent with HDR development standards. Planning Area 5 would include 80 age-restricted units located in the northeastern portion

IN THE COUNTY OF RIVERSIDE

# TENTATIVE TRACT MAP NO. 38163




**VICINITY MAP**
N.T.S.
THOMAS GUIDE, PAGE 899-E3

**PROPERTY ACREAGE**
GROSS = 196.0 AC.
NET = 191.4 AC.

**ASSESSOR'S PARCEL NUMBER**
472-110-001, 002, 003, 004, 007, 008, 009, 32, 033, 034

**SECTIONS, TOWNSHIPS AND RANGES**
S 1/2, SECTION 21, T.6S., R.2W.

**THOMAS BROTHERS MAP**
PORTIONS OF PAGE 899-GRID D2, 899-GRID D3, 899-GRID E2, 899-GRID E3, 899-GRID F2, 899-GRID F3.

**EXISTING GENERAL PLAN DESIGNATION**
MEDIUM DENSITY RESIDENTIAL, COMMERCIAL RETAIL, LOW DENSITY RESIDENTIAL MIXED USE AREA, OPEN SPACE-CONSERVATION, AND VERY LOW DENSITY RESIDENTIAL

**PRESENT USE**
VACANT

**PROPOSED USE**
MEDIUM DENSITY RESIDENTIAL, MEDIUM HIGH DENSITY RESIDENTIAL, HIGH DENSITY RESIDENTIAL, OPEN SPACE RECREATION, OPEN SPACE CONSERVATION, OPEN SPACE CONSERVATION HABITAT, OPEN SPACE WATER

**EXISTING AND PROPOSED ZONING**
KELLER CROSSING SPECIFIC PLAN (SP 380)

**BENCHMARK:**
RECOVERY NOTE BY METRO WATER DISTR SD, CALIFORNIA 1992
2.8 MILES (4.5 KM) NORTHWEST OF LAKE SKINNER, AT THE NORTHWEST CORNER OF KELLER ROAD AND WASHINGTON STREET, 30 FEET (9.1 M) WEST OF THE CENTERLINE OF WASHINGTON STREET, 24 FEET (7.3 M) NORTH OF THE CENTERLINE OF KELLER ROAD, 8.8 FEET (2.7 M) SOUTH OF POWER POLE NO. 25758BRIE, 2 FEET (0.6 M) NORTH OF A CARSONITE SURVEY MARKER, A 3-1/2 INCH STANDARD BRASS DISK, SET FLUSH, IN TOP OF A 8 INCH BY 8 INCH CONCRETE POST, 0.5 FEET (15.2 CM) ABOVE THE GROUND.
ELEVATION 1433.58 (NGVD 88')

**LEGAL DESCRIPTION:**
PARCELS 1 THROUGH 10, INCLUSIVE, OF PARCEL MAP 15244, AS SHOWN BY PARCEL MAP RECORDED IN BOOK 85, PAGES 6 AND 7 OF PARCEL MAPS, RIVERSIDE COUNTY RECORDS;

EXCEPTING THEREFROM THAT PORTION OF PARCELS 9 AND 10 CONVEYED TO THE STATE OF CALIFORNIA IN GRANT DEED RECORDED NOVEMBER 19, 2010 AS INSTRUMENT NO. 2010-0506116, OF OFFICIAL RECORDS;

ALSO EXCEPTING THEREFROM THAT PORTION OF PARCEL 8 CONVEYED TO THE STATE OF CALIFORNIA IN GRANT DEED RECORDED NOVEMBER 19, 2010 AS INSTRUMENT NO. 2010-0506117, OF OFFICIAL RECORDS;

APN: 472-110-001 THROUGH 472-110-004, 472-110-007 THROUGH 472-110-009, AND 472-110-032 THROUGH 472-110-034.

**NOTES:**
FOR SITE DRAINAGE WITHIN 10'-0" OF THE BUILDING FOUNDATION THE PERVIOUS SURFACE IMMEDIATELY ADJACENT TO THE FOUNDATION MAY BE SLOPED AWAY FROM THE BUILDING AT A SLOPE OF 2% AND THE IMPERVIOUS SURFACES MAY BE SLOPED AWAY FROM THE BUILDING AT A SLOPE OF 1% FOR A MINIMUM DISTANCE OF UP TO 10'-0" MEASURED PERPENDICULAR TO THE FACE OF THE WALL AND ALSO THE SWALE WITHIN 10 FEET OF THE BUILDING FOUNDATION MAY BE SLOPED AT A MINIMUM OF 1 PERCENT IF ALL THE FOLLOWING CONDITIONS ARE MET:

1. THE SURFACE SOIL IS CLASSIFIED AS HAVING "VERY LOW" TO "MEDIUM" EXPANSION POTENTIAL PER PROJECT COUNTY APPROVED GEOTECHNICAL REPORT.

2. SUFFICIENT AREA SUB SURFACE DRAINS SHALL BE PROVIDED WITHIN 10'-0" OF BUILDING FOUNDATION WITH A POSITIVE DRAINAGE TO AN APPROVED DRAINAGE FACILITY. THE DRAIN LINES SHALL HAVE A MINIMUM 0.5% SLOPE AND MAINTAIN A MINIMUM 3" DIAMETER.

3. ALL ASPECTS OF THE PRECISE GRADE DRAINAGE DESIGN SHALL BE VERIFIED BY THE CIVIL ENGINEER OF RECORD AND SUBMITTED TO GRADING INSPECTOR PRIOR TO PRECISE GRADING PERMIT FINAL. [CBC 1804.11 & CPC R104.11]

**PROPOSED STORM DRAINS**
PROPOSED DRAINAGE & STORM DRAIN SYSTEMS WILL BE CONSTRUCTED WITH THIS SUBDIVISION. STORM DRAIN SYSTEMS SHALL BE MAINTAINED BY R.C.F.C.& W.D. OR BY THE RIVERSIDE COUNTY TRANSPORTATION DEPT.

**GEOLOGIC HAZARD NOTE**
PROJECT SITE IS NOT SUBJECT TO GEOLOGIC HAZARDS; ALQUIST-PRIOLO OR SPECIAL STUDIES ZONE. PROJECT IS SUSCEPTABLE TO SUBSIDENCE AND HAS LOW SUSCEPTABILITY TO LIQUIFACTION.

**WELLS**
THERE ARE EXISTING WELLS WITHIN 200 FEET OF PROPERTY

**AERIAL TOPOGRAPHY**
AIRBORNEAD MAPPING CORP.
1887 BUSINESS CENTER DRIVE, SUITE 5A
SAN BERNARDINO, CA 92408
PH: 909-889-2400
(OCTOBER 2020)

**PROPOSED SUBSURFACE SEPTIC DISPOSAL**
THERE IS NO SUBSURFACE SEPTIC DISPOSAL PROPOSED FOR THIS PROJECT.

**EASEMENT NOTES**
SEE SHEET 9

**ESTIMATED EARTHWORK**
RAW CUT..... 1,200,000 CY.
RAW FILL..... 1,200,000 CY.
EXPORT (APPROX.)..... 0 CY.

**MOBILE HOME AND R.V. PARKING**
THERE ARE NO DESIGNATED MOBILE HOME OR R.V. PARKING FACILITIES PROPOSED FOR THIS PROJECT.

**FLOOD PLAIN DESIGNATION**
THIS PROPERTY IS OUTSIDE OF THE 100-YEAR FLOOD PLAIN ZONE. SITE IS NOT SUBJECT TO OVERFLOW OR INUNDATION

**GENERAL NOTES**
1. THIS PROPERTY IS LOCATED WITHIN FLOOD ZONE "X" ESTABLISHED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY. FLOOD ZONE "X" IS DEFINED AS "AREAS OF MINIMAL FLOODING". SAID DESIGNATION IS SHOWN ON FLOOD INSURANCE RATE MAP FOR RIVERSIDE COUNTY (UNINCORPORATED AREA), CALIFORNIA SHOWING COMMUNITY PANEL NUMBER 06065C0960G, DATED AUGUST 28, 2008.

2. EXCEPT AS SHOWN, THERE ARE NO ENCROACHMENTS ONTO ADJOINING PREMISES, STREETS OR ALLEYS BY AND BUILDINGS, STRUCTURES OR OTHER VISIBLE IMPROVEMENTS, AND NO ENCROACHMENTS ONTO SAID PREMISES BY BUILDINGS, STRUCTURES OR OTHER VISIBLE IMPROVEMENTS SITUATED ON ADJOINING PREMISES.

3. ANY UNDERGROUND UTILITIES HAVE NOT BEEN PHYSICALLY LOCATED.

4. THIS PROPERTY IS LOCATED IN RIVERSIDE COUNTY TRANSPORTATION AND LAND MANAGEMENT AGENCY PLANNING DEPARTMENT KELLER CROSSING SPECIFIC PLAN NO. 380, WHICH HAS A ZONING DESIGNATION OF SPECIFIC PLAN.

5. THIS PARCEL CONTAINS 191.44 ACRES, MORE OR LESS.

6. THIS PROPERTY IS LOCATED WITHIN A VERY HIGH FIRE HAZARD AND LOCAL RESPONSIBILITY AREA.

7. THIS PROPERTY IS LOCATED WITHIN WRMSHCP CELL GROUP-U AND WITHIN CELL NUMBER = 5067

**STREET SUMMARY**

| | | | |
|---|---|---|---|
| KELLER ROAD = | 2478 LF | "G" STREET = | 2917 LF |
| WINCHESTER ROAD = | 2212 LF | "H" STREET = | 939 LF |
| POURROY ROAD = | 1312 LF | "J" STREET = | 476 LF |
| "A" STREET = | 1215 LF | "K" STREET = | 1810 LF |
| "B" STREET = | 1795 LF | "L" STREET = | 754 LF |
| "C" STREET = | 1022 LF | "M" STREET = | 239 LF |
| "D" STREET = | 408 LF | "N" STREET = | 914 LF |
| "E" STREET = | 398 LF | "O" STREET = | 338 LF |
| "F" STREET = | 1827 LF | "P" STREET = | 1113 LF |

**PROPOSED IMPROVEMENT SCHEDULE**
SCHEDULE "A"

**PROPOSED DEVELOPMENT**

| PLANNING AREA | UNITS | ACRES | DENSITY | LAND USE PLAN DESIGNATION |
|---|---|---|---|---|
| 1 (LOTS 1-41, 349-384) | 77 | 16.03 | 4.80 | MDR |
| 2 (LOTS 42-173) | 132 | 21.52 | 6.14 | MHDR |
| 3 (LOTS 174-384) | 175 | 23.11 | 7.57 | MHDR |
| 4 (FEE SIMPLE LOTS 385-614) | 230 | 19.42 | 11.84 | HDR |
| 5* (CONGREGATE CARE) | 80 | 7.29 | 10.97 | HDR |
| RESIDENTIAL SUBTOTAL | 694 | - | - | |
| *PROPOSED FUTURE DEVELOPMENT | | | | |
| OPEN SPACE | | | | |
| 6 | -- | 1.00 | -- | OS-C |
| 7 | -- | 2.49 | -- | OS-R |
| 8 | -- | 8.88 | -- | OS-R |
| 9 | -- | 61.42 | -- | OS-CH |
| 10 | -- | 4.13 | -- | OS-W |
| 11 | -- | 4.79 | -- | OS-W |
| 12 | -- | 7.02' | -- | OS-W |
| OPEN SPACE SUBTOTAL | | 89.79 | | |
| CIRCULATION*** | -- | 18.93*** | -- | |
| CIRCULATION SUBTOTAL: | | 18.89 | | |
| PROJECT TOTAL: | 675 | 196.05 | -- | |

*** CIRCULATION ACREAGE INCLUDES RIGHT OF WAY DEDICATIONS FOR OLD KELLER ROAD, KELLER ROAD, WINCHESTER ROAD, POURROY ROAD AND INTERNAL STREETS A, B, C, PORTION OF K, P, AND PORTION OF G.

**OWNER**
FORESTAR (USA) LOS ANGELES HOLDING COMPANY INC.
2221 E. LAMAR BLVD., SUITE 790
ARLINGTON, TX 76006
ATTN: DANIEL C. BARTOK

**APPLICANT**
DR HORTON LOS ANGELES HOLDING COMPANY INC.

**ENGINEER**
RTM ENGINEERING CONSULTANTS, INC.
357 N. SHERIDAN STREET, SUITE 117
CORONA, CA 92880
PHONE: (951) 279-1800
PROJECT MANAGER: AMIR FALLAHI, P.E.

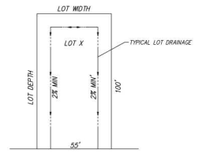
**SOILS ENGINEER**
GEOTEK, INC.
1548 NORTH MAPLE STREET
CORONA, CA 92878
ATTN: EDWARD H. LAMONT
PH: 951-710-1160

**UTILITIES AND SERVICES**

| AGENCY SERVING THE AREA | | FACILITIES PRESENT |
|---|---|---|
| ELECTRIC: | SOUTHERN CALIFORNIA EDISON | YES |
| GAS: | SOUTHERN CALIFORNIA GAS CO. | YES |
| TELEPHONE: | VERIZON | YES |
| CABLE TV: | FRONTIER/SPECTRUM | YES |
| WATER: | EASTERN MUNICIPAL WATER DISTRICT | YES |
| SEWER: | EASTERN MUNICIPAL WATER DISTRICT | YES |
| SCHOOL DIST: | MENIFEE UNION SCHOOL DISTRICT | --- |
| | PERRIS UNION HIGH SCHOOL DISTRICT | --- |

**INDEX MAP**
1"=200'

**LEGEND**
TRACT BOUNDARY
PROPOSED PARCEL
PROP. R/W DEDICATION
DAYLIGHT LINE
EXISTING EASEMENT
EXISTING CONTOUR
PROPOSED CONTOUR
PROPOSED 2:1 SLOPE
LOT NUMBER 35'
LETTERED LOT LOT 'X'
PROPOSED PAD ELEVATION P=66.3
EXISTING POWER POLE
PROPOSED STORM DRAIN SD
EXISTING STORM DRAIN SD
PROPOSED DOMESTIC WATER W
EXISTING DOMESTIC WATER W
PROPOSED RECYCLED WATER RW
PROPOSED SEWER S
PROPOSED SEWER S
PROP. RETAINING WALL
EXISTING STREET ROW TO BE VACATED
PROP. FIRE HYDRANT




**TYPICAL LOT DRAINAGE**
NTS

Source(s): RTM Engineering Consultants, 2026

Figure 3-13

Not to Scale

of the site on approximately 7.29 acres. These units are anticipated to be developed in a campus-style setting with shared amenities, internal circulation, and access provided via proposed Streets B and C, with connectivity to Keller Road and adjacent residential and open space areas.

- **Recreation Park Site.** TTM 38163 proposes one lot designated for public park use, totaling approximately 8.88 acres, located near the center of the site. This lot corresponds to Planning Area 8 of SP 380A1 and is designated as Open Space – Recreation (OS-R). The park is intended to serve as a central amenity for surrounding neighborhoods and would accommodate both passive and active recreational uses.

- **Detention Basins.** TTM 38163 proposes five lots for detention and water quality basins, totaling approximately 13.50 acres. These lots implement Planning Areas 10, 11, and 12 of SP 380A1 and are designated as Open Space – Water (OS-W).

- **Open Space - Conservation Habitat.** TTM 38163 accommodates approximately 61.42 acres within Planning Area 9 for Open Space – Conservation Habitat (OS-CH) uses in accordance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). This area encompasses preserved natural hillside and habitat resources in the northern portion of the site and is not subdivided into individual lots as part of the tentative map.

- **On-Site Public Roadways**. TTM 38163 proposes public streets on approximately 34.47 acres, including the proposed realignment and improvement of Keller Road, Old Keller Road, Winchester Road (State Route 79), and Pourroy Road, as well as new internal streets identified as Streets B, C, D, E, F, and G.

## 3.6 PROJECT CONSTRUCTION AND OPERATIONAL CHARACTERISTICS

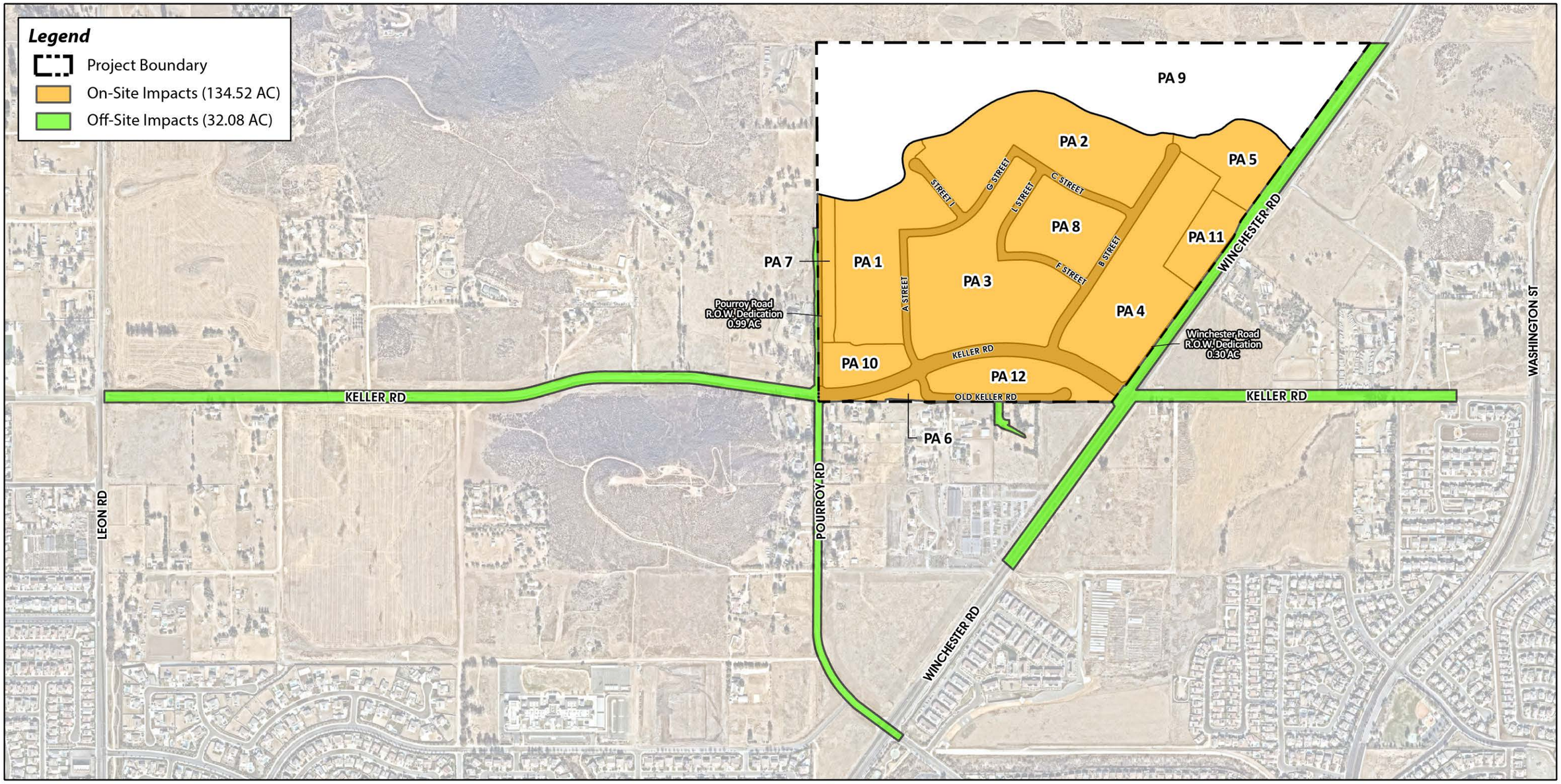
### 3.6.1 Construction Details

#### A. Proposed Physical Disturbance

For purposes of analysis throughout this EIR, it is assumed that implementation of the Project would result in disturbances to approximately 134.52 acres of the 196.05-acre Project site. In addition, the Project would require off-site impacts to areas proposed for roadway improvements and/or construction of water, sewer, and drainage facilities on approximately 32.08 acres. As shown on Figure 3-14, *Proposed Limits of Physical Disturbance*, in total areas planned for disturbance on or off site would comprise approximately 166.60 acres. No other on- or off-site physical impacts are anticipated from Project implementation.

#### B. Timing and Construction Activity

For purposes of analysis throughout this EIR, construction of the Project is assumed to commence in October 2025 and would occur over multiple overlapping phases, with completion anticipated by January 2030.




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.; GLA (03-23-2026); RTM Engineering Consultants (01-22-2026)

Figure 3-14

Proposed Limits of Physical Disturbance

While it is possible that construction activities could occur later than anticipated, the construction schedule evaluated throughout this EIR represents a "worst case" assessment of potential construction-related impacts since air quality emission factors for construction decreases as time passes and the analysis year increases due to emission regulations becoming more stringent and the phasing out of older, more polluting equipment. [1]. As emissions from construction Project construction is expected to occur in two primary phases, in addition to initial off-site work. The Off-Site Phase includes grading, utility installation, and roadway improvements and would occur between October 2025 and November 2026. Phase 1 (In-Tract) improvements, including sewer, storm drain, water, dry utilities, and street improvements, would occur between February 2027 and June 2027. Phase 1 (On-Site) development, including grading, building construction, paving, and architectural coatings, is anticipated to occur from June 2026 through August 2028. Phase 2, which consists primarily of vertical construction, paving, and finishes, would begin in March 2026 and extend through August 2028, depending on market conditions.

The construction durations and associated equipment assumptions used for modeling represent a reasonable approximation of the anticipated construction fleet, consistent with industry standards and CEQA requirements.

### 3.6.2 Operational Characteristics

The proposed Project would operate as a residential master-planned community with supporting open space, recreational, and infrastructure components. Typical operational characteristics would include residents and visitors traveling to and from the site, leisure and maintenance activities occurring within individual residential lots and common areas, and ongoing use of on-site parks and open space amenities. The Project would generate low levels of ambient noise and a moderate level of artificial exterior lighting typical of residential neighborhoods.

All lighting associated with the Project would be subject to the requirements of County of Riverside Ordinance Nos. 655 and 915, which regulate outdoor illumination. Ordinance No. 655 requires the use of low-pressure sodium lamps and mandates shielding of all nonexempt outdoor lighting fixtures. Ordinance No. 915 requires that all outdoor luminaires be located, shielded, and directed such that no direct light spills beyond the Project boundaries or onto adjacent public rights-of-way.

#### A. Future Population

Implementation of the proposed Project would result in the construction of 694 residential dwelling units, including a mix of single-family detached, small-lot, and multi-family age-restricted housing. According to Appendix E of the Riverside County General Plan, the average household size in the Southwest Area Plan (SWAP) is 3.17 persons per household (pph). However, because the General Plan does not provide a specific pph factor for age-restricted housing, population associated with those units is estimated using a 2.11 pph

[1] As shown in the CalEEMod User's Guide Version 2022, Appendix G "Table G-11. Statewide Average Annual Offroad Equipment Emission Factors" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

factor from the National Association of Home Builders (NAHB) publication "Approving 55+ Housing: Facts That Matter." As shown in Table 3-3, *Estimated Future Population,* the Project is anticipated to generate a future population of approximately 2,115 residents.

It should be noted that the proposed Project is located within the Valley-Wide Recreation and Park District (VWRPD). The VWRPD's Master Plan establishes a different persons-per-household (pph) value for residential uses within its district (i.e., 3.51 pph for single-family detached units and 3.02 for multi-family structures with 2-4 dwelling units). Accordingly, while the population generation rates shown in Table 3-3 are used for the analysis throughout most of this EIR, the calculation of parkland demand is instead based

**Table 3-3 Estimated Future Population**

| Land Use | Dwelling Units | Persons per Household | Estimated Population |
|---|---|---|---|
| Single Family Residential | 384 | 3.17 pph | 1,217 |
| Multi-Family Residential | 230 | 3.17 pph | 729 |
| Multi-Family Residential (Age Restricted) | 80 | 2.11 pph | 169 |
| **Totals:** | **694** | **--** | **2,115** |

(Riverside County, 2021a, Appendix E, Table E-2; NAHB, n.d., Figure I-2)

on the person-per-household rates used in Table 2 of Appendix E of the VWRPD's Master Plan, except for the Project's proposed age-restricted multi-family residential units proposed within Planning Area 5, which instead are based on the NAHB factors as described above. As shown in EIR Table 4.17-1 in EIR Subsection 4.17, *Recreation*, based on the VWRPD Master Plan pph values, the Project would generate an estimated future population of 2,211 persons. Thus, for purposes of calculating parkland demand only, it is assumed the Project would result in the generation of 2,211 residents. (VWRPD, 2025, Appendix E, Table 2)

### B. Employment

Because the proposed Project includes only residential, recreational, and open space land uses, it is not expected to generate substantial on-site employment. Any employment associated with the Project would be limited to operations and maintenance activities related to community infrastructure, recreational amenities, landscaping, and open space management. These activities may be carried out by contracted service providers or part-time staff but would not result in permanent, full-time employment-generating land uses. Accordingly, no significant on-site employment is assumed as part of the Project, and the Project is not anticipated to contribute meaningfully to the local jobs-housing balance.

### C. Traffic

A Project-specific Traffic Study was prepared for the proposed Project by Urban Crossroads, Inc. ("TA"; *Technical Appendix L2*). To develop the trip generation characteristics of the proposed Project, trip-generation statistics published in the Institute of Transportation Engineers (*Trip Generation Manual*, 11th Edition, 2021) were utilized for the following land use codes (Urban Crossroads, 2025f, p. 3):

- Single Family Detached Housing (ITE Land Use Code 210)
- Multifamily (Low-Rise) Residential (ITE Land Use Code 220)
- Senior Adult Housing – Single Family (ITE Land Use Code 251)
- Active Park (San Diego Municipal Code, Land Development Code Trip Generation Manual, May 2003)

As summarized in Table 3-4, *Project Trip Generation Summary*, Phase 1 of the Project is anticipated to generate a net total of approximately 2,359 daily trip-ends, including 165 trips during the AM peak hour and 219 trips during the PM peak hour. Upon full buildout, the Project is expected to generate a total of approximately 5,968 daily trip-ends, with 398 AM peak hour trips and 538 PM peak hour trips**.** These estimates reflect conservative assumptions, as the trip generation analysis did not apply reductions for alternative modes of travel such as walking, biking, or transit. Additionally, no internal capture or pass-by trip reductions were applied, as the proposed Project is exclusively residential with no commercial components that would otherwise support those types of trip adjustments (Urban Crossroads, 2025f, p. 53).

**Table 3-4 Project Trip Generation Summary**

| Land Use | Quantity/Units[1] | AM Peak Hour | | | PM Peak Hour | | | Daily |
|---|---|---|---|---|---|---|---|---|
| | | In | Out | Total | In | Out | Total | |
| Phase 1: Single Family Residential | 180 DU | 33 | 93 | 126 | 107 | 63 | 170 | 1,697 |
| Phase 1: Multifamily (Low-Rise) Residential | 98 DU | 9 | 30 | 39 | 31 | 18 | 49 | 662 |
| **Phase 1 Total:** | | **42** | **123** | **165** | **138** | **81** | **219** | **2,359** |
| Phase 2: Single Family Residential | 384 DU | 70 | 199 | 269 | 227 | 134 | 361 | 3,622 |
| Phase 2: Multifamily (Low-Rise) Residential | 230 DU | 22 | 70 | 92 | 74 | 43 | 117 | 1,550 |
| Phase 2: Senior Adult Housing - Single Family | 80 DU | 6 | 13 | 19 | 15 | 9 | 24 | 346 |
| Phase 2: Active Park | 8.88 Acres | 9 | 9 | 18 | 18 | 18 | 36 | 450 |
| **Project Buildout Total:** | | **107** | **291** | **398** | **334** | **204** | **538** | **5,968** |

1. DU= Dwelling Units

(Urban Crossroads, 2025f, Table 4-2)

The proposed Project consists exclusively of residential land uses and supporting park and open space areas. Accordingly, the trip generation analysis did not apply reductions for internal capture or pass-by trips, which are typically associated with commercial, retail, or mixed-use developments. Instead, trip generation was conservatively estimated using standard trip rates published in the Institute of Transportation Engineers (*Trip Generation Manual*, 11th Edition, 2021) for single-family detached housing and low-rise multifamily housing, and using the City of San Diego Trip Generation Manual for senior adult housing. The traffic study also did not apply reductions for alternative modes of transportation (e.g., walking, biking, or transit), resulting in a conservative estimate of vehicle trip generation. These assumptions ensure that the analysis presents a worst-case scenario consistent with CEQA guidelines.

### D. Water Demand

A Water Supply Assessment (WSA) was issued for a prior version of the Project in 2021, which evaluates the water demands of a prior version of the Project. Based on calculations prepared by the Project engineer, it was determined that the currently-proposed Project would have a slightly increased demand for potable water of approximately 1,000 gallons per day (gpd), or roughly 1.1 acre-feet per year (AFY), as compared to

the range of land uses evaluated in the 2021 WSA. EMWD reviewed the proposed Project and the proposed Project's anticipated increase in demand for 1.1 AFY, and issued a letter update to the 2021 WSA indicating that the findings of the 2021 WSA still are applicable to the currently-proposed Project and reconfirming the conclusion reached by the 2021 WSA that the EMWD would have adequate water supply to serve the currently-proposed Project. The original WSA and the WSA Update letter are included as EIR *Technical Appendices M1*and *M2*, respectively. Accordingly, and based on the rates used in the Project's WSA to calculate water demand for MDR, MHDR, and HDR land uses, Table 3-5, *Projected Water Demand*, shows the current Project's anticipated demand for potable water. As shown, the Project would generate a demand for approximately 252,780 gpd, or approximately 283.2 AFY.

**Table 3-5 Projected Water Demand**

| Land Use | Dwelling Units/ Acres | Demand Factors | Average Day Demand | Annual Demand (AFY) |
|---|---|---|---|---|
| Medium-Density Residential (MDR) | 77 units | 440 gpd/unit | 33,880 | 38.0 |
| Medium-High Density Residential (MHDR) | 307 units | 400 gpd/unit | 122,800 | 137.6 |
| High Density Residential (HDR) | 310 units | 310 gpd/unit | 96,100 | 107.6 |
| | | **Total:** | **252,780** | **283.2** |

Note: Project water demand calculations are based on the current Project's water demand based on the water demand factors used in Table 11 of the Project's WSA (*Technical Appendix M1*).
(EMWD, 2021d, Table 11)

This analysis reflects a conservative estimate using standardized water use factors for land use planning. Actual consumption may vary based on final design, fixture efficiency, and landscaping details.

### E. Wastewater Generation

According to wastewater generation estimates used in Riverside County EIR No. 521, residential uses within the County are anticipated to result in the generation of approximately 230 gallons per day (gpd) of wastewater per dwelling unit. The wastewater demand rates identified by EIR No. 521 reflect the County's standard estimate for wastewater generation by use type within the County. Thus, the Project is expected to result in the generation of approximately 159, 620 gpd of wastewater requiring treatment (694 dwelling units x 230 gpd/dwelling unit = 159,620 gpd). (Riverside County, 2015)

## 3.7 SUMMARY OF REQUESTED ACTIONS

The County of Riverside has primary approval responsibility for the proposed Project. As such, the County serves as the Lead Agency for this EIR pursuant to State CEQA Guidelines Section 15050. The role of the Lead Agency was previously described in detail in Section 1.0 of this EIR. As part of the approval process for the proposed Project, the County's Planning Commission will hold a public hearing to consider this EIR, the Project's General Plan Amendment (GPA210004), Amendment No. 1 to Specific Plan No. 380 (SP00380A01), Change of Zone (CZ2100012), and Tentative Tract Map (TTM38163). The Planning Commission will make advisory recommendations to the Board of Supervisors on whether to approve, approve with changes, or deny GPA210004, SP00380A01, CZ2100012, and TTM38163 and whether to certify this EIR. A public hearing

will then be held before the Board of Supervisors, which will consider the information contained in the Project's EIR and the EIR's Administrative Record in its decision-making processes, and will certify or decline to certify this EIR, and will approve, approve with changes, or deny proposed GPA210004, SP00380A01, CZ2100012, and TTM38163.

## 3.8 RELATED ENVIRONMENTAL REVIEW AND CONSULTATION

Subsequent to approval of GPA210004, SP00380A01, CZ2100012, and TTM38163, additional discretionary applications would be required to implement the Project. For example, Plot Plans may be required for the development of the proposed age-restricted multi-family housing within PA 5 of SP 380A1, and a Condominium Map may also be required depending on the final configuration of those units. The County of Riverside will review any future implementing discretionary applications for consistency with the General Plan, the Southwest Area Plan (SWAP), SP 380A1, and the applicable zoning standards established for the site.

In accordance with the California Environmental Quality Act (CEQA), the County also will determine whether any future implementing discretionary actions require additional environmental review. The County will evaluate whether such actions meet the conditions outlined in State CEQA Guidelines Sections 15162 or 15163, which would necessitate the preparation of a Subsequent or Supplemental EIR. If those conditions are not met, then an Addendum to this EIR may be prepared pursuant to State CEQA Guidelines Section 15164.

In addition to future discretionary approvals, various ministerial actions would also be required to fully implement the Project. These include, but are not limited to, grading permits, building permits, encroachment permits, road and drainage infrastructure improvements, utility connections (water and sewer), stormwater permits under the National Pollutant Discharge Elimination System (NPDES), and permits from applicable state and federal resource agencies.

Table 3-6, *Matrix of Project Approvals/Permits*, provides a summary of the agencies responsible for discretionary and ministerial actions associated with Project implementation. This EIR evaluates the environmental impacts associated with all federal, State, and local approvals necessary to construct and operate the Project, whether explicitly identified in Table 3-6 or not, pursuant to State CEQA Guidelines Section 15124(d).

**Table 3-6 Matrix of Project Approvals/Permits**

| Public Agency | Approvals and Decisions |
|---|---|
| **County of Riverside** | |
| Riverside County Planning Commission | • Provide recommendations to the Riverside County Board of Supervisors whether to approve Amendment No. 1 to the Keller Crossing Specific Plan No. 380 (SP00380A01), General Plan Amendment No. 210004 (GPA210004), Change of Zone No. 2100012 (CZ2100012), and TTM 38163 (TTM38163).<br>• Provide recommendations to the Riverside County Board of Supervisors regarding certification of this Project EIR. |
| Riverside County Board of Supervisors | • Approve, conditionally approve, or deny Amendment No. 1 to the Keller Crossing Specific Plan No. 380 (SP00380A01).<br>• Approve or deny General Plan Amendment No. 210004 (GPA210004).<br>• Approve or deny Change of Zone No. 2100012 (CZ2100012).<br>• Approve, conditionally approve, or deny TTM No. 38163 (TTM38163).<br>• Reject or certify this Project EIR along with appropriate CEQA Findings. |
| **Subsequent Riverside County Discretionary and Ministerial Approvals** | |
| Riverside County Subsequent Implementing Approvals: Planning Department and/or Building & Safety | • Approve implementing Plot Plans.<br>• Approve implementing Conditional Use Permits.<br>• Approve implementing condominium map(s).<br>• Record Final Maps.<br>• Issue Grading Permits.<br>• Issue Building Permits.<br>• Approve Road Improvement Plans.<br>• Issue Encroachment Permits.<br>• Issue Conditional Use Permits, if required. |
| **Other Agencies – Subsequent Approvals and Permits** | |
| San Diego Regional Water Quality Control Board | • Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit<br>• Issuance of a Construction General Permit<br>• Issuance of a Waste Discharge Order pursuant to Section 13260 of the California Water Code |
| California Department of Fish and Wildlife | • Issuance of a Section 1602 Streambed Alteration Agreement |
| Riverside County Flood Control and Water Conservation District (RCFCWCD) | • Approval of proposed drainage infrastructure |
| South Coast Air Quality Management District (SCAQMD) | • Permits and approvals associated with operation of stationary equipment, if proposed |
| Eastern Municipal Water District (EMWD) | • Approval of proposed water and sewer connections and improvements |

### 3.8.2 References


| Cited As | Reference |
|---|---|
| EMWD, 2021d | Eastern Municipal Water District, 2021. *Water Supply Assessment Report, Keller Crossing (Specific Plan No. 380)*. December 15, 2021. Included as EIR *Technical Appendix M1*. |
| EMWD, 2025 | Eastern Municipal Water District, 2025. *Subject: Keller Crossing Water Supply Assessment*. July 22, 2025. Included as EIR *Technical Appendix M2*. |
| Firewise 2000, 2025 | Firewise 2000, LLC. 2025. *Fuel Modification Plan Keller Crossing*. March 18, 2025. Included as *Technical Appendix N* to this EIR. |
| NAHB, n.d. | National Association of Homebuilders, n.d. *Approving 55+ Housing: Facts That Matter*. Accessed May 14, 2025. Available online: https://www.winchester.us/DocumentCenter/View/1182/Helios---Approving-55-Plus-Housing |
| Riverside County, 2015 | Riverside County, 2015. *General Plan – Environmental Impact Report No. 521 – Volume 1 (State Clearinghouse No. 2009041065)*. December 8, 2015. Accessed January 5, 2026. Available on-line: https://planning.rctlma.org/general-plan-environmental-impact-report-volume-i |
| Riverside County, 2021a | Riverside County, 2021a. *County of Riverside General Plan*. June 29, 2021. Accessed April 28, 2025. Available on-line at: https://planning.rctlma.org/General-Plan-Zoning/General-Plan. |
| RTM, 2025 | RTM Engineering Consultants, 2025. *Preliminary Drainage Study for Tentative Tract Map No. 38163 (Keller Crossing)*. March 2025. Included as *Technical Appendix I1* to this EIR. |
| Urban Crossroads, 2025f | Urban Crossroads, Inc., 2025f. *Keller Crossing TTM No. 38163 Traffic Analysis*. April 7, 2025. Included as *Technical Appendix L2* to this EIR. |
| VWRPD, 2025 | Valley-Wide Recreation and Park District, 2025. *2020 Master Plan Update*. June 16, 2025. Accessed August 20, 2025. Available on-line: https://www.gorecreation.org/ |

# 4.0 ENVIRONMENTAL ANALYSIS

## 4.0.1 Summary of EIR Scope

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

In compliance with the procedural requirements of CEQA, a Notice of Preparation (NOP) was prepared and distributed for a 30-day public review period on August 31, 2021, in relation to a previously-proposed land use concept for the site. The previously-proposed land use concept (herein, "Prior Project") would have allowed for future development of the approximately 196.1 acre Project with up to 176,000 square feet (s.f.) of "Commercial Retail (CR)" land uses on 17.7 acres, 280 "Medium-Density Residential (MDR)" dwelling units on 62.7 acres, 76 "Medium-High-Density Residential (MHDR)" dwelling units on 14.1 acres, 80 "High-Density Residential (HDR)" dwelling units that would be age qualified on 7.8 acres, 1.0 acre of "Community Development-Very Low Density Residential (CD-VLDR)" land uses, 9.5 acres of "Open Space-Recreation (OS-R)" land uses, 6.8 acres of "Open Space-Water (OS-W)" land uses, 61.1 acres of "Open Space-Conservation Habitat (OS-CH)" land uses, and 15.3 acres of major circulation facilities. Following consideration of public comments on the NOP, a Draft EIR was prepared, which was circulated for a 45-day public review period that started on September 22, 2022, and concluded on November 7, 2022.

Prior to completion of the Final EIR for the Prior Project, the Project Applicant determined that the previously-proposed land uses were not feasible to implement based on financial considerations. As a result, the Project Applicant filed revised applications for the proposed SP00380A01, GPA210004, CZ2100012, and TTM38163 (collectively referred to herein as the "Project" or "proposed Project"). The revisions to these applications resulted in the elimination of the previously-proposed 17.7 acres of CR land uses, and the reconfiguration of the site design to accommodate 77 MDR dwelling units on 16.03 acres, 307 MHDR dwelling units on 44.63 acres, 310 HDR dwelling units on 26.71 acres (inclusive of 80 Age-Qualified HDR units on 7.29 acres), an 8.88-acre public park (OS-R), 3.49 acres of Open Space-Conservation (OS-C), 16.00 acres of drainage/water quality features (OS-W), 61.42 acres designated OS-CH for Multiple Species Habitat Conservation Plan (MSHCP) conservation purposes, 18.89 acres of major roadways, and the dedication of 1.29 acres of public rights-of-way for Pourroy Road (0.99-acre) and Winchester Road (0.30-acre). On April 3, 2025, Riverside County recirculated the Project's NOP for a 30-day public review period in order to disclose that the design for the Project site had been changed and to afford the public the opportunity to comment on the potential environmental effects that may result from the newly-proposed land uses. During the 30-day public review period, a publicly-noticed scoping meeting was held at Riverside County Administrative Building on April 21, 2025.

An Initial Study was not prepared for the Project, and as such both NOPs that were circulated for public review indicated that the required EIR will evaluate all of the topics listed in Appendix G to the State CEQA Guidelines, as implemented by Riverside County and the County's standard Environmental Assessment (EA) Form. Public comments on the scope consisted of written comments received by Riverside County in

response to the NOPs issued for this EIR. Taking all known information and public comments into consideration, inclusive of comments received in relation to the August 31, 2021 NOP and the updates to the State CEQA Guidelines, 21 primary environmental subject areas are evaluated in this Section 4.0, as listed below. Each Subsection evaluates several specific subject matters related to the general topic of the Subsection. The title of each Subsection is not limiting; therefore, refer to each Subsection for a full account of the subject matters addressed therein.

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

### 4.0.2 Scope of Cumulative Effect Analysis

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

> *'Cumulative Impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.*
>
> *(a) The individual effects may be changes resulting from a single project or a number of separate projects.*
>
> *(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

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

document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact (the 'summary of projections' approach).

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

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

As noted, for most issue areas, nearby portions of unincorporated Riverside County and nearby portions of the City of Murrieta and City of Menifee are used as the Project's cumulative study area. This cumulative study area encompasses a large area surrounding the Project site that has similar environmental characteristics as the Project area. This area largely contains open space, undeveloped lands, agricultural, and rural residential uses, with master-planned residential communities and commercial retail uses located further to the south and west. This study area exhibits similar characteristics in terms of climate, geology, and hydrology. This study area also encompasses the service areas of the Project site's primary public service and utility providers. Areas outside of this study area either exhibit topographic, climatological, or other environmental circumstances that differ from those of the Project area, or are simply too far from the proposed Project site to produce environmental effects that could be cumulatively considerable.

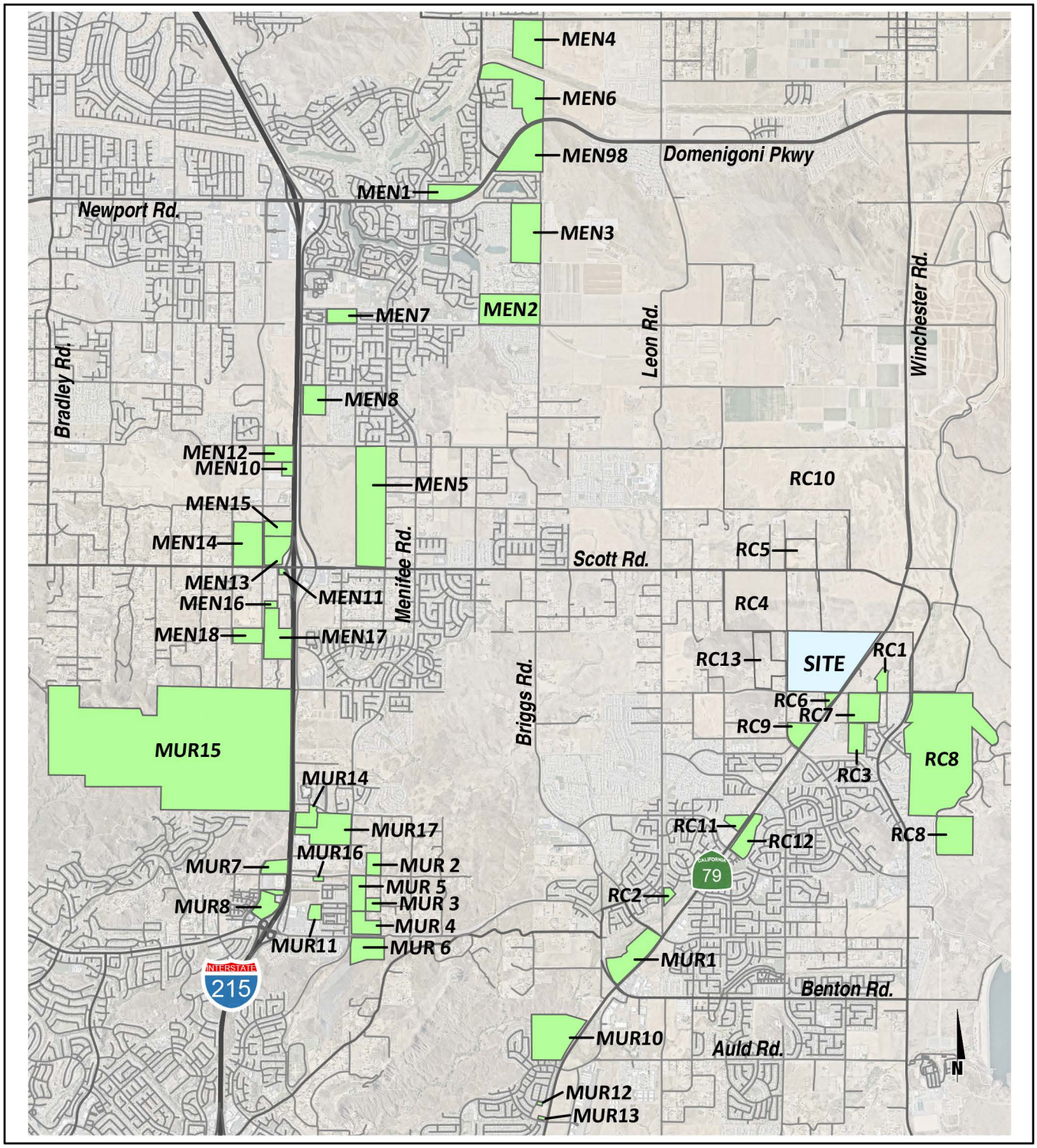
The analysis of cumulatively-considerable traffic-related noise impacts relies on a combined approach, utilizing the list of projects approach for the near-term projection of cumulative traffic volumes, and the

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

For near-term conditions, the analyses of cumulatively-considerable vehicular-related noise impacts is based on existing traffic conditions plus ambient growth and the manual addition of traffic from past, present, and reasonably foreseeable projects, and includes approved and pending development projects in proximity to the Project site that would contribute traffic to the same transportation facilities as the Project, as well as large, traffic-intensive projects farther from the Project site that have the potential to affect regional transportation facilities. This methodology recognizes development projects that have the potential to contribute measurable traffic to the same intersections, roadway segments, and/or State highway system facilities as the proposed Project and have the potential to be made fully operational in the foreseeable future. As shown on Table 4.0-1, *Cumulative Projects List*, and as depicted on Figure 4.0-1, *Cumulative Development Projects Location Map*, the near-term cumulative impact analysis of traffic-related air quality, greenhouse gases, and noise impacts, includes 48 other past, present, and reasonably foreseeable projects within this study area in addition to the summary of projections. The analysis of long-term cumulatively-considerable traffic-related noise impacts considers full buildout of nearby portions of unincorporated Riverside County, the City of Murrieta, and the City of Menifee, based on the general plan land use plans for these jurisdictions.

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

> *"…the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.*
>
> *Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance*




Source(s): Urban Crossroads, 2025f

Figure 4.0-1

Not to Scale

Cumulative Development Projects Location Map

## Table 4.0-1 Cumulative Projects List

| # Project Name | Land Use | Quantity Units[1] |
|---|---|---|
| **County of Riverside:** | | |
| RC1 PPT220048 | RV Storage Yard | 255 Spaces |
| RC2 TR37089 | Single Family Housing | 21 DU |
| RC3 TR36687R1 | SFDR | 69 DU |
| RC4 Frederick's Ridge | Single Family Housing | 422 DU |
| RC5 TTM38738 | Single Family Housing | 189 DU |
| RC6 CUP190012 | Self-Storage | 185.468 TSF |
| RC7 TR36722 (SP 286A6) | SFDR | 146 DU |
| RC8 Belle Terre Specific Plan (SP00382) | Single Family Housing | 1,282 DU |
| TTM37449 | Single Family Housing | 372 DU |
| TTM38175 | Single Family Housing | 98 DU |
| TTM38263 | Condominium | 140 DU |
| PPT220020 | Condominium | 157 DU |
| RC9 PP19442R01 | Condominium | 180 DU |
| RC10 Domenigoni - Barton Properties (SP00310) | SFDR | 2,823 DU |
| | Mixed Use | 200.8 AC |
| | Commercial Retail | 42.4 AC |
| | Commercial Recreation | 117.9 AC |
| | School | 44.0 AC |
| | Passive Park | 37.6 AC |
| RC11 TTM37078 | Condominium | 164 DU |
| RC12 PPT170003 | Condominium | 154 DU |
| RC13 TR37089 | Single Family Housing | 21 DU |
| **City of Murrieta:** | | |
| MUR1 Murrieta Marketplace | Retail Center | 492.717 TSF |
| | Restaurant Space | 26.100 TSF |
| MUR2 Lee Lane Apartments (DP-2022-2536) | Multi-Family Residential | 258 DU |
| MUR3 Greenberg Apartments (DP-2022-2634) | Multi-Family Residential | 162 DU |
| MUR4 Whitewood & Clinton Keith (DP-2022-2737) | Multi-Family Residential | 262 DU |
| MUR5 Whitewood South (DP-2021-2347) | Multi-Family Residential | 322 DU |
| MUR6 Vintage Farms | Multi-Family Residential | 483 DU |
| MUR7 Hotel and Conference Building | Hotel | 120 RM |
| | Conference/Event Building | 15.295 TSF |
| MUR8 The Orchard | Retail Center | 460.000 TSF |
| | Gas Station | 12 VFP |
| | Home Depot | 107.891 TSF |
| | Ross | 25.000 TSF |
| | Target | 186.000 TSF |
| MUR9 Kaiser Permanente (Phase II) (DP-2014-348) | Medical Office Building | 90.000 TSF |
| MUR10 Adobe Springs (DP-2015-616) | Single Family Housing | 287 DU |
| | Business Park | 208.500 TSF |
| MUR11 Vineyard Commercial Center (Phase IV) (DP-2018-1656) | Commercial Center | 72.000 TSF |
| MUR12 La Alba Learning Center/Day Care (DP-2020-2191) | Day Care Center | 9.900 TSF |

| # Project Name | Land Use | Quantity Units[1] |
|---|---|---|
| MUR13 La Alba Gas Station (DP-2019-1850) | Gas Station w/ Convenience Market | 16 VFP |
| MUR14 Makena Hills (DP-2021-2271) | Medical Dentist Office Building | 106.000 TSF |
| | Hotel | 206 RM |
| | High-Turnover Restaurant | 9.300 TSF |
| MUR15 Murrieta Hills SP (TTM 35853) | Single-Family Housing | 578 DU |
| | Multi-Family Residential | 172 DU |
| | Retail Center | 346.302 TSF |
| MUR16 Linnel Lane Self-Storage (DP-2023-00061) | Self-Storage | 107.005 TSF |
| MUR17 Discovery Village (DP-2024-00078) | Single-Family Housing | 72 DU |
| | Condominium | 293 DU |
| **City of Menifee:** | | |
| MEN1 Menifee Village TTM | Residential | 91 DU |
| MEN2 Nautical Cove | Single Family Housing | 239 DU |
| MEN3 Rockport Ranch (50% Complete) | Single Family Housing | 305 DU |
| MEN4 Salt Creek TTM 38625 | Single Family Housing | 325 DU |
| MEN5 Cantelena | Single Family Housing | 296 DU |
| TTM 38372 & TTM 38682 | Single Family Housing | 406 DU |
| MEN6 TTM 37671 | Single Family Housing | 182 DU |
| MEN7 Del Ortho North | Apartment | 238 DU |
| | Independent Senior Living | 100 DU |
| MEN8 Adler Ranch (Tricon) (30% Complete) | Residential Condo | 327 DU |
| MEN9 Diamond Bros | Single Family Housing | 197 DU |
| MEN10 Fitwell Health | Office Building | 9.000 TSF |
| | Fitness Club | 35.000 TSF |
| | Multipurpose Center | 34.200 TSF |
| MEN11 Holiday Inn | Hotel | 98 RM |
| MEN12 Haun and Garbani | Mixed-Use Light Manufacturing and Retail | 291.020 TSF |
| MEN13 Walmart | Fast Food Restaurants | 6.200 TSF |
| | Gas Station/Convenience Store | 2.800 TSF |
| | Sit-Down Restaurant | 6.500 TSF |
| | Auto Service & Repair | 6.680 TSF |
| | Major Retail Building | 240.980 TSF |
| | Retail Shops | 13.800 TSF |
| MEN14 The Junction | Hotel | 85.282 TSF |
| | Senior Living and Memory Care Facility | 304 DU |
| | Fitness Center | 37.000 TSF |
| | Restaurant | 19.480 TSF |
| | Anchor Building | 157.844 TSF |
| | Retail Shops | 54.500 TSF |
| MEN15 Freedom Business Park | Light Industrial and Warehousing | 283.300 TSF |
| MEN16 Bailey Park Irrigation Supply | Warehouse | 19.603 TSF |
| MEN17 Commerce Pointe | Industrial | 151.147 TSF |
| MEN18 PEMCOR | Commercial and Industrial Business Park | 337.000 TSF |

[1] AC = Acres; DU = Dwelling Units; TSF = Thousand Square Feet; VFP = Vehicle Fueling Positions; RM = Rooms

(Urban Crossroads, 2025f, Table 4-3)

*thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."* (SCAQMD, 2003a)

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

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

Environmental impacts associated with buildout of the cumulative study area were evaluated in CEQA compliance documents prepared for the respective general plans of each of the above-named jurisdictions. The location where each of these CEQA compliance documents is available for review is provided below. All of the CEQA compliance documents listed below are herein incorporated by reference pursuant to State CEQA Guidelines Section 15150.

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

- City of Murrieta General Plan 2035 EIR (SCH No. 2010111084), available for public review at the City of Murrieta Planning Division, located at 1 Town Square, 24601 Jefferson Avenue, Murrieta, California 92562.

- City of Menifee General Plan EIR (SCH No. 2012071033), available for public review at the City of Menifee Planning Division, 29844 Haun Road, Menifee, California 92586.

### 4.0.3 Identification of Impacts

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

The thresholds of significance used in this EIR are based on the thresholds presented in State CEQA Guidelines Appendix G and as applied by Riverside County's standard Environmental Assessment (EA) Form. The thresholds are intended to assist the reader of this EIR in understanding how and why this EIR reaches a conclusion that an impact would or would not occur, is significant, or is less than significant.

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

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

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

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

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

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

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

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

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

### 4.0.4 References


| Cited As | Reference |
|---|---|
| SCAQMD, 1993 | South Coast Air Quality Management District, 1993. *CEQA Air Quality Handbook*. Accessed April 28, 2025. Available on-line at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook. |
| SCAQMD, 2003a | South Coast Air Quality Management District, 2003a. *White Paper on Potential Control Strategies*. Accessed April 28, 2025. Available on-line at: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf. |
| SCAQMD, 2017 | South Coast Air Quality Management District, 2017. *South Coast Air Quality Management District Air Quality Management Plan*. Accessed April 28, 2025. Available on-line at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp. |

Urban Crossroads, 2025f — Urban Crossroads, Inc., 2025f. Keller Crossing TTM No. 38163 Traffic Analysis. April 7, 2025. Included as *Technical Appendix L2* to this EIR.

# 4.1 AESTHETICS

This Subsection describes the aesthetic qualities and visual resources present on the Project site and in the site's vicinity and evaluates the potential effects that the Project may have on these resources. Descriptions of existing visual characteristics, both on-site and in the vicinity of the Project site, and the analysis of potential impacts to aesthetic resources are based, in part, on field observations and site photographs collected by T&B Planning Inc. in May 2025, analysis of aerial photography (Google Earth, 2025), and Project application materials submitted to Riverside County and described in Section 3.0, *Project Description*, of this EIR. This Subsection also is based in part on information and policies contained in the Riverside County General Plan Update No. 960 (Riverside County, 2021a), Riverside County GIS database (RCIT, n.d.), Riverside County Ordinance No. 348 (Riverside County, 2023a), and Riverside County Ordinance No. 655 (Riverside County, 1988).

## 4.1.1 Existing Conditions

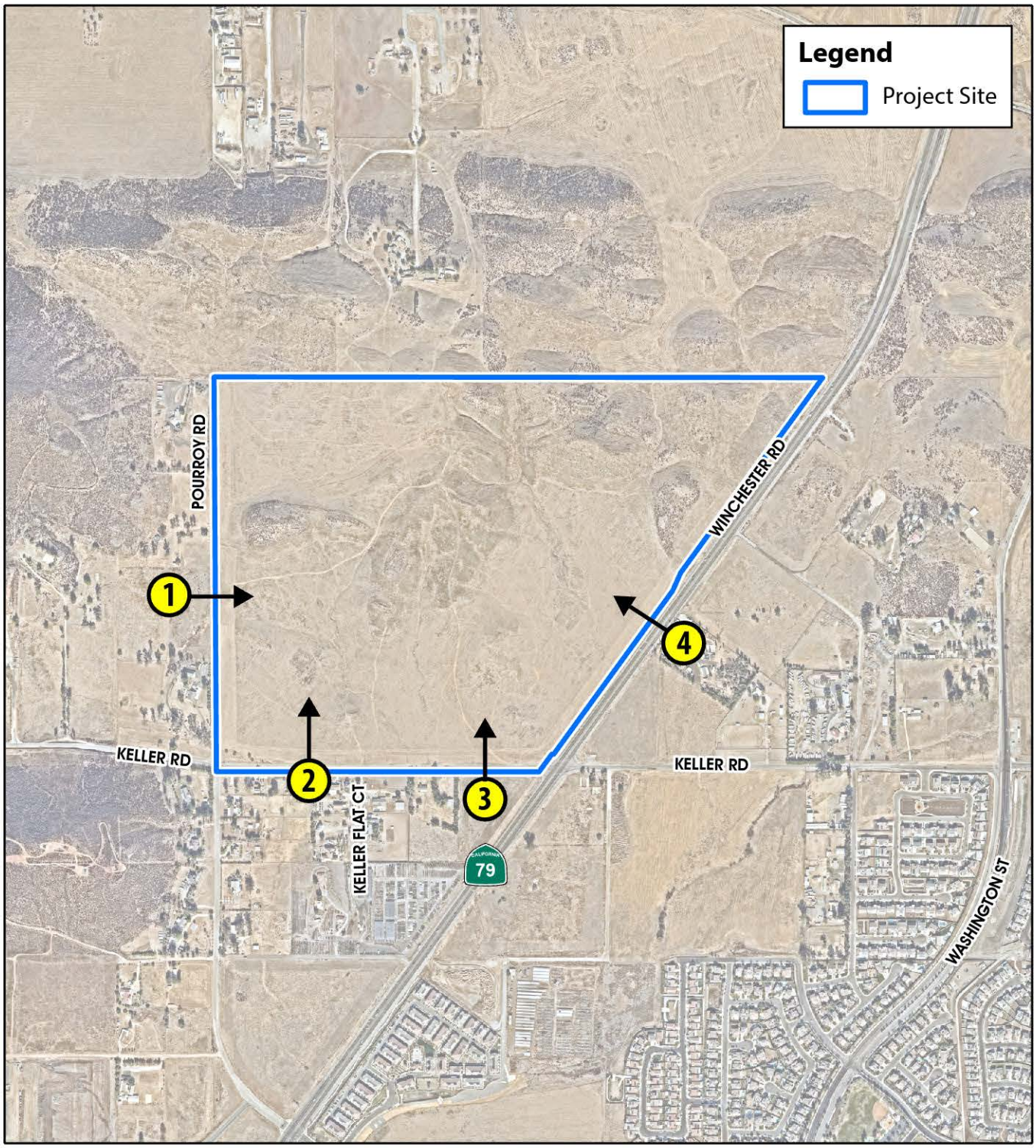
### A. Existing Aesthetic Conditions

The Project site comprises approximately 196.1 acres of undeveloped land located west of Highway 79 (SR-79), north of Keller Road, and east of the future alignment of Pourroy Road. Under existing conditions, the Project site is largely undisturbed, with the flatter portions in the western and southern portions of the site having been used for agricultural production (dry farming).

The Project site generally is characterized by relatively flat topography in the southern portions of the site, with undulating hill forms occurring in the north and northeastern portions of the Project site. Elevations on site range from 1,422 feet above mean sea level (amsl) in the southeast corner of the Project site to 1,587 feet amsl near the northeast corner of the Project site. (Google Earth, 2025)

To illustrate the existing visual conditions of the Project site in more detail, a photographic inventory was prepared. Figure 4.1-1, *Site Photographic Key Map*, depicts the locations of the four vantage photographs, each of which are described below. These photographs, shown on Figure 4.1-2 and Figure 4.1-3, were taken in May 2025 and provide a representative visual inventory of the site's visual characteristics as seen from surrounding public viewing areas.

- Site Photograph 1: Site Photograph 1 was taken near the western boundary of the Project site along the future alignment of Pourroy Road, looking northeast to southeast. In the foreground and extending along both sides of the photo is a gravel-surfaced segment of Pourroy Road, flanked by wire fencing along the western side. Wooden utility poles and overhead lines are visible along both edges of the road, associated with nearby residential development. The central and middle ground portions of the site consist of undeveloped, gently rolling terrain with non-native grassland and weedy vegetation, characteristic of disturbed agricultural lands historically used for dry farming. In the background, low hill forms are visible within the northern portion of the Project site (left of center), while prominent off-site foothills and ridgelines appear along the eastern horizon.




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.

Figure 4.1-1

Site Photographic Key Map

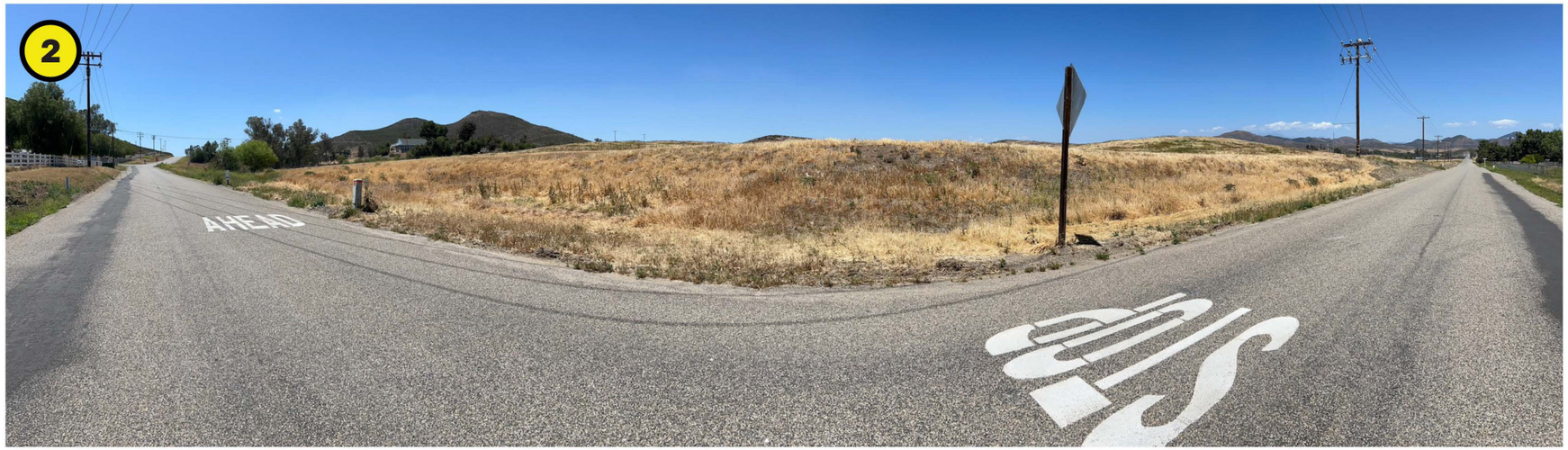
**Northeast**




**Southeast**

**Photo 1:** West of the project boundary boundary along the future alignment of Pourroy Road, looking northeast to southeast.

**Northwest**




**Northeast**

**Photo 2:** South of the project boundary along (Old) Keller Road just east of its intersection with Pourroy Road, looking northwest to northeast.

Figure 4.1-2

Not to Scale

Site Photographs 1 and 2

**Northwest**




**Northeast**

**Photo 3:** South of the project boundary along (Old) Keller Road just west of its intersection with Winchester Road (Highway 79), depicting views of the southeast corner of the Project site, looking northwest to northeast.

**Southwest**




**Northeast**

**Photo 4:** East of the project boundary along Winchester Road (Highway 79) depicting westerly views of the Project site.

Figure 4.1-3

Not to Scale

Site Photographs 3 and 4

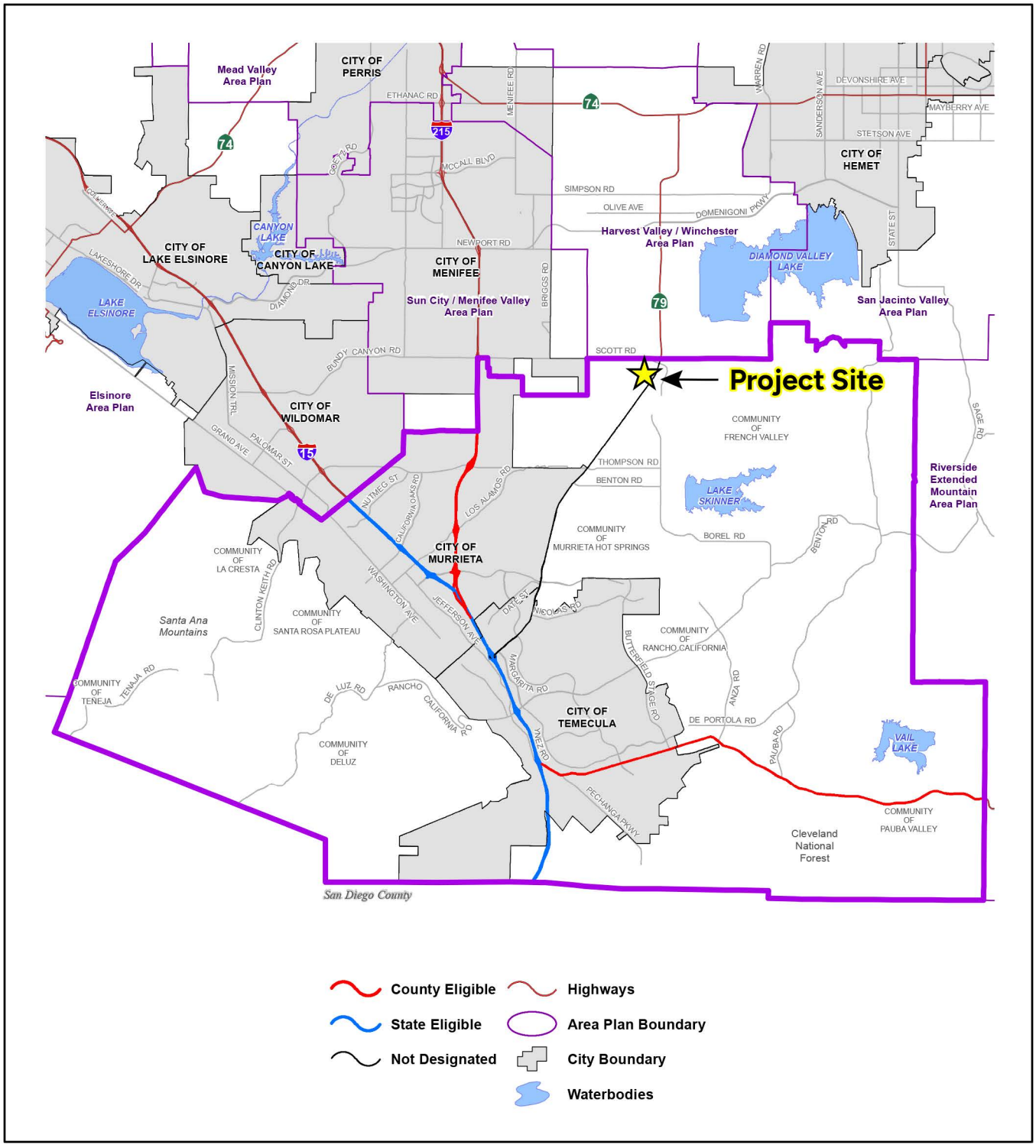
- Site Photograph 2: Site Photograph 2 was taken along the southern boundary of the Project site on (Old) Keller Road, facing northwest to northeast. In the foreground, painted roadway markings and a reflective traffic sign are visible on (Old) Keller Road. Overhead utility lines and poles run along both sides of the road and continue into the middle ground. The Project site lies to the north of the roadway, beyond the edge of pavement and traffic sign, and consists of undeveloped, gently sloping terrain covered in ruderal grasses and disturbed soils consistent with prior agricultural use. The intersection with Pourroy Road is located behind the viewpoint, to the southwest. In the distance, off-site hills and ridgelines rise along the eastern horizon, while rural residential development is visible on the left side of the image, including fencing, vegetation, and single-family homes.

- Site Photograph 3: Site Photograph 3 was taken along the southern boundary of the Project site on (Old) Keller Road, west of Winchester Road (Highway 79), and depicts views looking northwest to northeast across the southeastern portion of the site. In the foreground, a utility box is visible along the roadside, with the improved portion of (Old) Keller Road shown in the foreground. The Project site extends beyond the road and features disturbed, ruderal terrain that transitions into disced areas indicative of ongoing dryland farming. Powerlines and utility poles are visible along the north side of (Old) Keller Road. Toward the right side of the image, elements of the signalized intersection at Winchester Road are visible, including traffic signals and street lighting. In the background, rolling terrain is visible across the site, with a distinct off-site hill form to the west (left) and ridgelines along the eastern horizon (right).

- Site Photograph 4: Site Photograph 4 was taken from the eastern boundary of the Project site along Winchester Road (Highway 79) and depicts views looking west across the site. In the foreground, the multi-lane Winchester Road corridor is visible, including pavement striping. Immediately beyond the roadway, the Project site consists of open, gently rolling terrain covered with ruderal vegetation and signs of past dryland farming. A chain-link fence and slope run along the southbound shoulder of the roadway, visible in the right portion of the image. In the background, low hills within or near the northern portion of the site appear in the center and right portions of the photo.

### B. Scenic Highways

According to Figure 9 (*Scenic Highways*) of the Southwest Area Plan (SWAP), and as shown on Figure 4.1-4, *SWAP Scenic Highways*, there are no officially designated scenic highways within the Project site's vicinity. The nearest State-designated scenic highway to the Project site is State Route 74 (SR-74), located approximately 15.3 miles northeast of the Project site. The nearest "State Eligible" Scenic Highway is Interstate 15 (I-15), located approximately 7.3 miles southwest of the Project site. There are no "County Designated" Scenic Highways in the Project vicinity. The nearest "County Eligible" Scenic Highway is Interstate 215 (I-215), located approximately 4.0 miles west of the Project site. (Riverside County, 2021b, Figure 9)




Source(s): RCTLMA, 12-08-2015

Figure 4.1-4

Not to Scale

SWAP Scenic Highways

### 4.1.2 Applicable Regulatory Requirements

#### A. State Plans, Policies, and Regulations

*1. California State Scenic Highways*

The California Department of Transportation (Caltrans) manages the State Scenic Highway Program, established in 1963 through Senate Bill 1467, Streets and Highways Code, Sections 260 through 263 to protect and enhance the natural scenic beauty of California highways and adjacent corridors, through special conservation treatment. A highway may be designated as scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. Scenic corridors consist of land that is visible from, adjacent to, and outside the highway right-of-way, and are comprised primarily of scenic and natural features. Topography, vegetation, viewing distance, and/or jurisdictional lines determine the corridor boundaries. Existing law provides Caltrans with full possession and control of all State highways, while this legislation places the Scenic Highway Program under the stewardship of Caltrans. The legislation further declares the intent of the State to assign responsibility for the regulation of land use and development along scenic highways to the appropriate State and local governmental agencies. Scenic highways are classified as either Officially Designated or Eligible for designation and Caltrans maintains the lists of these highways.

#### B. Local Plans, Policies, and Regulations

*1. Riverside County General Plan*

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

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

The Circulation Element, Land Use Element, and Multipurpose Open Space Element of the Riverside County General Plan also identify scenic corridors, which are roadways (including State and County eligible and

designated scenic highways) that traverse scenic resources, and identify policies that are intended to protect and maintain the scenic resources within these corridors (Riverside County, 2021a, p. OS-52). Scenic highways in the Project vicinity were previously depicted on Figure 4.1-4. As noted in the SWAP, Policy SWAP 19.1 seeks to "Protect the scenic highways in the Southwest planning area from change that would diminish the aesthetic value of adjacent properties in accordance with the Scenic Corridors sections of the General Plan Land Use, Multipurpose Open Space, and Circulation Elements." (Riverside County, 2021b, p. 49)

### C. Riverside County Ordinance No. 348, Land Use Ordinance

Riverside County's Land Use Ordinance No. 348 establishes allowable uses of land and sets standards for what and how land may be developed. The ordinance protects the people and property of Riverside County from development of unsuitable land uses and aims to ensure that built areas are developed safely and with minimal conflict with surrounding lands. Ordinance No. 348 also identifies requirements for landscaping associated with development proposals. The landscaping of development projects should enhance the visual character and aesthetic quality of a site and its surroundings. (Riverside County, 2023)

### D. Riverside County Ordinance No. 655, Regulating Light Pollution

Riverside County has adopted an ordinance regulating light pollution (Ordinance No. 655). Ordinance No. 655 is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce "skyglow" or light pollution that affects day or nighttime views from the Mt. Palomar Observatory, which is located approximately 22.9 miles southeast of the Project site. As shown on SWAP Figure 6 (Southwest Area Plan Mt. Palomar Nighttime Lighting Policy Area), the Project site is located within the limits of "Zone B" of the Mt. Palomar Observatory Lighting Policy Area (Riverside County, 2021b, Figure 6). As such, the Project site is subject to the outdoor lighting policies and requirements specified by Riverside County Ordinance No. 655, which includes specific standards for lighting fixtures installed along public roadways and in other common areas and applies to all new development. Ordinance No. 655 encourages the use of low-pressure sodium lamps where possible, requires the shielding of all nonexempt outdoor lighting fixtures, specifies the hours of operation for non-exempt outdoor lighting fixtures, and regulates lighting fixtures used to illuminate an outdoor advertising display. (Riverside County, 1988)

### E. Riverside County Ordinance No. 915, Regulating Outdoor Lighting

Riverside County has adopted an ordinance regulating outdoor lighting (Ordinance No. 915). Ordinance No. 915 is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure that all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and does not degrade their quality of life. (Riverside County, 2012)

### 4.1.3 Basis for Determining Significance

According to Section I of Appendix G to the CEQA Guidelines, the proposed Project would result in a significant impact to aesthetics if the Project or any Project-related component would:

a. *Have a substantial adverse effect on a scenic vista;*

b. *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;*

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

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

Additionally, the following thresholds are derived from EA No. 42865 (Riverside County's Environmental Assessment Checklist), as revised to reflect the December 2018 updates to the State CEQA Guidelines. As such, the following thresholds are used to evaluate the significance of the proposed Project's impacts on aesthetics. The proposed Project would result in a significant impact to aesthetics if the Project or any Project-related component would:

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

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

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

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

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

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

### 4.1.4 Impact Analysis

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

As previously indicated, there are no officially-designated scenic highways within the Project site's vicinity. The nearest State-designated scenic highway to the Project site is SR-74, located approximately 15.3 miles northeast of the Project site. The nearest "State Eligible" Scenic Highway is I-15, located approximately 7.1 miles southwest of the Project site. There are no "County Designated" Scenic Highways in the Project vicinity. The nearest "County Eligible" Scenic Highway is I-215, located approximately 4.0 miles west of the Project site. The Project site is not prominently visible from any portion of SR-74, I-15, or I-215 due to distance and intervening topography. As such, the Project would not have a substantial effect upon a scenic highway corridor, and no impact would occur. (Google Earth, 2025; Riverside County, 2021b, Figure 10)

| | |
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| **Threshold b:** | **Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?** |
| **Threshold c:** | **In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?** |

According to mapping information available from the United States Census Bureau (USCB), under existing conditions the Project site is not located within an urbanized area (UCSB, 2010)

Under existing conditions, the approximately 196.1-acre Project site is vacant and undeveloped. There are no scenic resources within the Project's boundaries under existing conditions, such as trees, rock outcroppings, or unique or landmark features. With implementation of the proposed Project, approximately 87.37 acres of the Project site would be developed with 694 residential dwelling units, including 77 Medium Density Residential (MDR) dwelling units, 307 Medium-High Density Residential (MHDR) dwelling units, and 310 High Density Residential (HDR) dwelling units. The Project also includes a proposed 8.88-acre park site, 3.49 acres of open space, three water quality/detention basins on 16.00 acres, and 61.42 acres of conserved open space in the northern portions of the site that would be conveyed to the Regional Conservation Authority (RCA) for long-term management as part of the Multiple Species Habitat Conservation Plan (MSHCP). The Project has been designed to incorporate open space and water quality/detention basins along the western and southern boundaries to serve as a buffer from existing residential uses to the west and south, thereby providing a transition between land uses. Although development of the Project site as proposed would represent a substantial change to the visual character of the site, because the Project site does not contain any scenic resources, including but not limited to, trees, rock outcroppings, or landmark features, implementation of the proposed Project would not damage scenic resources, and impacts would be less than significant.

Future development within the Project boundaries would be required to comply with the development standards and design guidelines included as part of SP 380A1, which have been designed to ensure that the property is developed in a manner that is not aesthetically offensive. Design guidelines included as part of SP 380A1 include guidance related to site design, architecture, and landscaping, compliance with which would be assured by the County's future review of implementing applications (e.g., building permits, plot plans). As such, and assuming mandatory compliance with the development standards and design guidelines included as part of SP 380A1, the Project would not result in the creation of an aesthetically offensive site open to public view, and impacts would be less than significant.

The Project site occurs in an area that is transitioning from rural to urban uses, as evidenced by existing and under construction developments located west and south of the Project site. As noted above, mandatory compliance with the development standards and design guidelines included as part of SP 380A1 would ensure that the Project site is developed in a manner that would not substantially degrade the site's existing visual character or quality. In fact, the Project would convert the Project site from agricultural and open space uses to a master-planned mixed-use community, which would be visually compatible with existing and planned development in the area. Although there are hillsides to the west and northeast of the Project site that represent scenic resources, and based on a viewshed analysis conducted in Google Earth, the hills to the northeast of the Project site are not prominently visible from the Project site under existing conditions due to the existing hillsides that occur in the northern portions of the Project site (Google Earth, 2025). While implementation of the Project as proposed would obstruct some views of the surrounding area, including views of nearby hillsides to the west of the Project site, public views of these visual resources within the Project's viewshed still would be available from areas surrounding the Project site. As such, the Project would not obstruct any prominent scenic vista or view open to the public, and impacts would be less than significant. Based on the preceding analysis, the Project would not conflict with applicable zoning or other regulations governing scenic quality, and impacts would be less than significant.

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

As shown on Figure 6, *Mount Palomar Nighttime Lighting Policy Area*, of the SWAP, the Project site is located within the limits of "Zone B" of the Mt. Palomar Observatory Lighting Policy Area (Riverside County, 2021b, Figure 6). All development projects within Zone B of the Mt. Palomar Nighttime Lighting Policy Area are required to adhere to the requirements of Riverside County Ordinance No. 655, which controls artificial lighting sources to protect the Observatory. Ordinance No. 655 states that low-pressure sodium lamps are the preferred illuminating source, and that outdoor lighting fixtures are required to be shielded. Pursuant to Section 7 of Ordinance No. 655, future building permits would be required to include specific information with regards to lighting, as follows: 1) the location of the site where outdoor light fixtures would be installed; 2) plans indicating the location and type of fixtures of the premises; and 3) a description of the outdoor light fixtures, including, but not limited to, manufacturer's catalog cuts and drawings. The required plans and descriptions would enable the County to determine whether compliance with the requirements of the ordinance is met. No building permits would be issued by the County unless the building permit applications demonstrate consistency with the various provisions of Ordinance No. 655. As such, the Project has no

potential to interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655, and impacts would be less than significant. (Riverside County, 1988)

| | |
|---|---|
| **Threshold e:** | **Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?** |
| **Threshold f:** | **Would the Project expose residential property to unacceptable light levels?** |

In addition to Riverside County Ordinance No. 655, which is addressed above under the analysis of Threshold d., future development on the Project site would be subject to Riverside County Ordinance No. 915 as well as the development standards and design guidelines of SP 380A1. Ordinance No. 915 requires that all outdoor luminaires in shall be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way. Compliance with Ordinance No. 915 would be assured through future review of building permit applications by Riverside County, and would ensure that the Project does not expose residential property to unacceptable light levels. Impacts would be less than significant. Additionally, SP 380A1 includes design guidelines that serve to prevent the creation of substantial light that could adversely affect day or nighttime views in the area and the exposure of residential properties to unacceptable light levels. Accordingly, Riverside County would review future implementing building permit applications for compliance with the Specific Plan design guidelines related to lighting.

Construction of the proposed Project would occur during daytime hours, in accordance with the timing restrictions imposed by Section 2.i. of Riverside County Ordinance No. 847 (Regulating Noise). As such, the Project would not require the use of nighttime lighting during construction activities, and no nighttime lighting impacts would occur during Project-related construction activities.

Furthermore, none of the Project's proposed building materials would consist of reflective materials, except for the proposed windows, which would not be mirrored and would have similar low-potential glare characteristics as do other glass windows on buildings in the surrounding area. The proposed Project does not include any components that would generate substantial amounts of glare from reflective surfaces; therefore, impacts associated with glare would be less than significant.

Mandatory compliance with the development standards and design guidelines of SP 380A1 and Riverside County Ordinance Nos. 348 and 915 would ensure that all lighting and building design elements proposed by the Project are designed to prevent the creation of substantial light or glare that could affect day or nighttime views in the area. Accordingly, implementation of the Project would result in a less-than-significant impact related to new sources of light or glare. Based on the foregoing analysis, and because the Project would be required to comply with the lighting standards in SP 380A1 as well as lighting provisions of Riverside County Ordinance Nos. 348, 655, and 915, impacts due to Project lighting and glare and due to the exposure of residential property to unacceptable light levels would be less than significant.

### 4.1.5 Cumulative Impact Analysis

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

As discussed under the analysis of Threshold a., there are no officially-designated or eligible State or County scenic highway corridors within the Project's viewshed. As such, the Project would not have a substantial effect on a scenic highway corridor, and no cumulatively-considerable impacts would occur.

The Project would not damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features, and impacts would therefore be less-than-cumulatively considerable. Based on the Project site's topography relative to surrounding areas, future development is not anticipated to obstruct views of any scenic vistas or views open to public review; thus, impacts would be less-than-cumulatively considerable. Additionally, because the Project would be developed in compliance with the design guidelines and development standards of proposed SP 380A1, the Project would not contribute to the creation of an aesthetically offensive site open to public view, and impacts would therefore be less-than-cumulatively considerable. In addition, with mandatory compliance with the design guidelines and development standards of proposed SP 380A1, the Project would not contribute to the substantial degradation of the existing visual character or quality of the site or its surroundings, and impacts would be less-than-cumulatively considerable. Furthermore, the Project would comply with the SP 380A1 zoning ordinance as well as all applicable Riverside County ordinances governing scenic quality, which would further ensure that cumulatively-considerable impacts associated with scenic resources would be less than significant.

The Project and other cumulative developments within the Project's viewshed would be required to comply with Riverside County Ordinance No. 655 requirements pertaining to Zone B. Compliance with Ordinance No. 655 would be assured through future County review of building permit applications. As such, cumulatively-considerable impacts due to a conflict with Ordinance No. 655 would be less than significant.

The proposed Project as well as other cumulative developments within the Project's viewshed would be subject to compliance with Riverside County Ordinance Nos. 655 and 915. Additionally, future development on site would be subject to the SP 380A1 lighting design guidelines, while the existing residential developments to the south and west of the Project site were developed in a manner consistent with Ordinance Nos. 655 and 915. Future development on lands to the east and north of the Project site also would be subject to compliance with Ordinance Nos. 655 and 915. Although the Project and cumulative developments may incorporate building materials with the potential to create glare, only limited building materials such as glass would have the potential to create glare impacts, and such impacts would be minor and would not adversely affect day or nighttime views in the area. Impacts due to light and glare would be less-than-cumulatively considerable.

### 4.1.6 Significance of Impacts Before Mitigation

Threshold a.: No Impact. The Project site is not located within the viewshed of any officially designated scenic highways, and would not be visually prominent from any State- or County-eligible scenic highways. No impacts would occur to scenic highway corridors.

Thresholds b. and c.: Less-than-Significant Impact. The Project would not substantially damage scenic resources; obstruct any prominent scenic vista or view open to the public; result in the creation of an aesthetically offensive site open to public view; substantially degrade the existing visual quality or character of the site or its surroundings; or conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

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

Thresholds e. and f.: Less-than-Significant Impact. Mandatory compliance with the SP 380A1 design guidelines related to lighting, along with compliance with Riverside County Ordinance Nos. 348, 655, and 915, would ensure that Project-related lighting and glare would not adversely affect day or nighttime views in the area, and also would ensure the Project does not expose residential property to unacceptable light levels. Although the Project would incorporate building materials with the potential to create glare, only limited building materials such as glass would have the potential to create glare impacts, and such impacts would be minor and would not adversely affect day or nighttime views in the area. Impacts would be less than significant.

### 4.1.7 Regulations, Design Requirements, and Mitigation

***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 Riverside County Ordinance No. 655, which is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce "skyglow" or light pollution that affects day or nighttime views from the Mount Palomar Observatory (located approximately 22.9 miles southeast of the Project site in northern San Diego County). Pursuant to the requirements of Ordinance No. 655, all lighting shall consist of low-pressure sodium lighting, or other lamp types that emit 4050 lumens or less. If light fixtures are proposed above 4050 lumens, then the lighting shall be fully shielded in conformance with the requirements of Ordinance No. 655.

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

- The Project is required to comply with the Design Guidelines of SP 380A1. Compliance with these Design Guidelines would be assured by the County's future review of implementing building permit applications for compliance with the Specific Plan's design features that would serve to reduce and/or avoid impacts relating to aesthetics.

***Mitigation***

Impacts would be less than significant; therefore, mitigation is not required.

### 4.1.8 References


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| UCSB, 2010 | United States Census Bureau, 2010. *USA Urban Areas (below 1:500k)* (GIS layer). Based on 2010 Census Data. Accessed June 17, 2025. Available on-line at: https://hub.arcgis.com/datasets/esri::usa-urban-areas/explore?layer=3&location=0.013850%2C-115.436540%2C0.00 |

# 4.2 AGRICULTURE AND FORESTRY RESOURCES

The information and analysis in this Subsection 4.2 are based in part on information obtained from the California Department of Conservation (CDC) Farmland Mapping & Monitoring Program (FMMP) (CDC, 2023), Riverside County GIS (RCIT, n.d.), and the Riverside County General Plan Amendment 960 Final EIR No. 521 (Riverside County, 2015). Refer to Section 7.0, *References*, for a complete list of these and other reference sources.

## 4.2.1 Existing Conditions

### A. Forestry Resources

The Project site is located in the French Valley area of unincorporated Riverside County, a rapidly urbanizing region that generally contains dry, sparsely-vegetated terrain in the natural condition. As shown in Figure 4.5.2 of the Riverside County General Plan Update Draft EIR No. 521, aside from sparsely scattered lowland forests/woodlands, there are no forestry resources in the Project's vicinity under existing conditions. The nearest forest land to the Project site occurs within the Cleveland National Forest, located approximately 12.1 miles southwest of the Project site; however, no timber production occurs in association with the Cleveland National Forest. (Riverside County, 2015, Figure 4.5.2)

### B. Agriculture Resources

*1. Regional Agriculture Setting*

According to the Riverside County Agricultural Commissioner's Office, in a document entitled, "Riverside County Agricultural Production Report 2023," the top three categories of agricultural resources cultivated in Riverside County (by value) are nursery stock, dates, and eggs. In 2023 (the most recent year for which data is available), the total gross value of agricultural production in Riverside County was approximately $1.54 billion, which represents a 3.3% increase from 2022 when total values were $1.49 billion. (Agricultural Commissioner's Office, 2023)

The CDC reports that agricultural lands face continuing pressure from urbanization and rising production costs. The CDC's "2016-2018 California Farmland Conversion Report" summarizes land use conversion between 2016 and 2018 (the most recent years for which information has been reported by the CDC), and states that Riverside County as a whole experienced a net loss of 5,980 acres of farmland, including 1,152 acres of Important Farmland, between 2016 and 2018, representing a decline of 1.4% (or a decline of 0.6% for Important Farmlands) (CDC, n.d., Table A-25). Important Farmlands, as defined by State CEQA Guidelines Appendix G and by Riverside County, include Prime Farmland, Statewide Important Farmland, and Unique Farmland.

*2. Historic and Existing Site Conditions*

According to the Project's Phase I Environmental Site Assessment ("ESA"; *Technical Appendix H1*), the lower elevations of the Project site have been used for agricultural production (dry farming) beginning in at least

1938. The higher elevations in the northeastern portions of the Project site consist of largely undisturbed open space that has not been subject to agricultural activities. (Tetra Tech, 2020)

*3. Zoning*

As described in EIR Section 2.0, *Environmental Setting*, the approximately 196.1-acre Project site is zoned for "Specific Plan Zone (SP Zone)," indicating that the property is within the boundaries of an adopted specific plan. The adopted Keller Crossing Specific Plan No. 380 (SP 380) designates the property for future development with 3 "Very Low Density Residential (VLDR)" dwelling units on 9.9 acres; 25 "Low Density Residential (LDR)" dwelling units on 18.3 acres; 42 "Medium Density Residential (MDR)" dwelling units on 13.9 acres; 39.5 acres of "Mixed Use," including 250 dwelling units and 250,000 square feet (s.f.) building area; 400,000 s.f. of "Commercial Retail (CR)" uses on 37.8 acres; 61.1 acres of "Open Space-Conservation (OS-C)" uses; and 20.6 acres of major circulation facilities. The Project site is not zoned for agricultural production under existing conditions. The Project site is surrounded by Rural Residential (RR) land uses to the north, east, west, and south; however, pursuant to Riverside County Ordinance No. 625, lands designated for RR uses are not considered "land zoned for primarily agricultural purposes." The nearest property zoned primarily for agricultural production (as defined by Riverside County Ordinance No. 625) occurs east of Highway 79 and north of Keller Road approximately 150 feet east of the Project site, and is zoned "Light Agriculture (A-1)." (RCIT, n.d.)

*4. Agriculture Land Designations*

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

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

- **Prime Farmland (P):** Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and

moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. (CDC, 2004, p. 6)

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

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

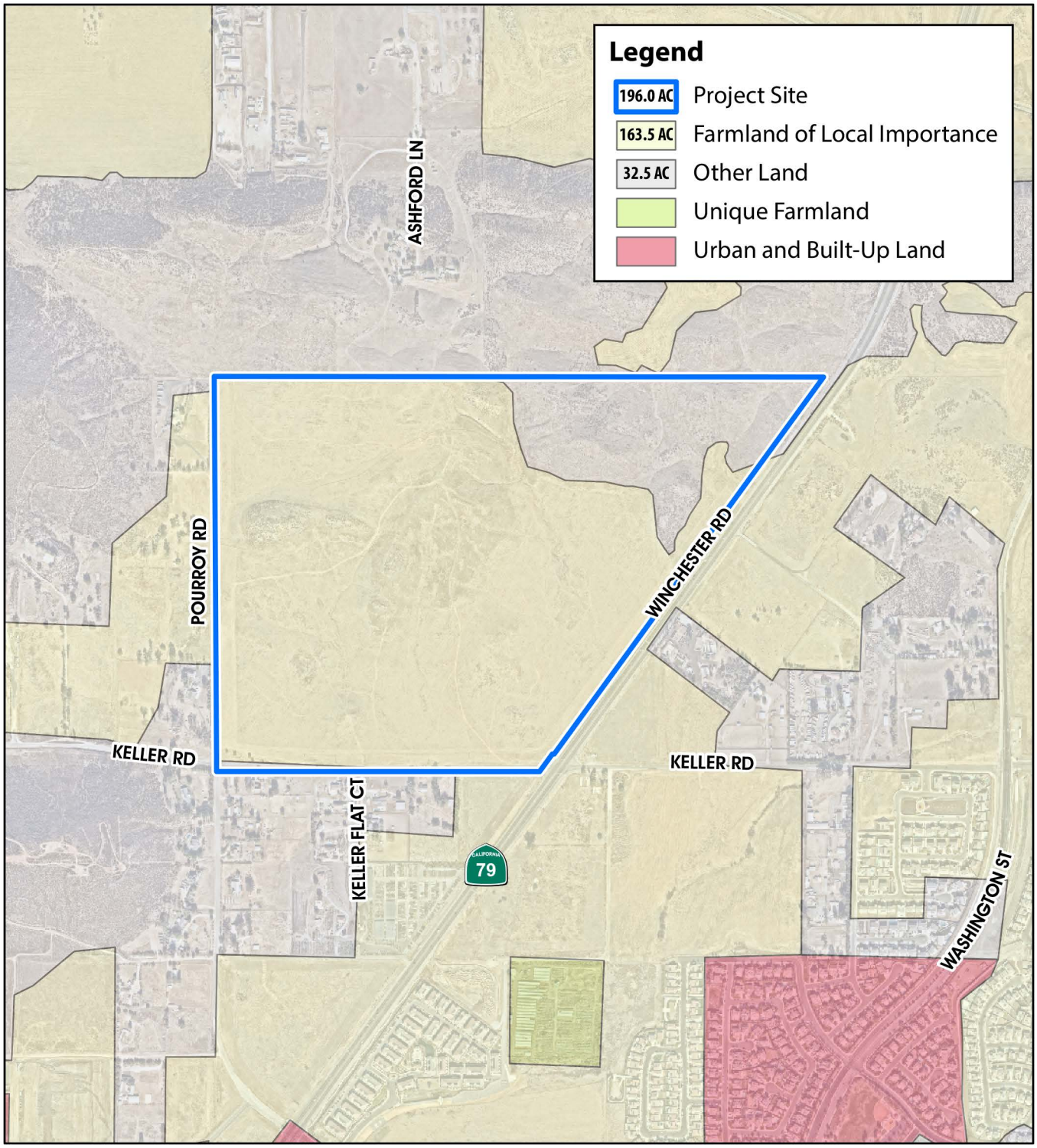
- **Farmland of Local Importance (L):** Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. (CDC, 2004, p. 6)

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

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

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

As shown on Figure 4.2-1, *FMMP Farmland Map*, approximately 163.48 acres of the Project site are mapped as containing "Farmland of Local Importance," while approximately 32.57 acres of the Project site are mapped as containing "Other Lands." "Farmland" is defined in Section II (a) of Appendix G of the State CEQA Guidelines to mean "Prime Farmland," "Farmland of Statewide Importance," or "Unique Farmland." Thus, there is no "Farmland" on the Project site under existing conditions as defined by Appendix G of the State CEQA Guidelines. (CDC, 2023)




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.; CDC, 2020

Figure 4.2-1

FMMP Farmland Map

*5. Williamson Act Land Preserves and Agricultural Preserves*

Agricultural preserves are the result of Riverside County's participation in the California Land Conservation Act (CLCA) of 1965, also known as the Williamson Act, CA Gov. Code § 51200, et seq. This program allows owners of agricultural land to have their properties assessed for tax purposes on the basis of agricultural production rather than current market value. The main purpose of the Act is to encourage property owners to continue to farm their land, and to prevent the premature conversion of farmland to urban uses. According to Riverside County GIS, the Project site is not included in any agricultural preserves, and is not subject to a Williamson Act Contract. The nearest land within an Agricultural Preserve or subject to a Williamson Act Contract occurs approximately 0.6-mile east of the Project site ("Winchester No. 2") (RCIT, n.d.).

### 4.2.2 Applicable Environmental Regulations

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

#### A. State Regulations

*1. California Land Conservation Act (CLCA)*

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

review and approval process, and the payment of a fee by the landowner equal to 12.5 percent of the full market value of the property in question.

*2. Farmland Mapping and Monitoring Program (FMMP)*

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

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

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

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

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

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

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

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

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

*3. California Forest Practice Act*

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

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

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

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

## B. Local Regulations

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

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

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

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

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

### 4.2.3 Basis for Determining Significance

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

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

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

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

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

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

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section II of Appendix G to the State CEQA Guidelines (as most recently amended in December 2018), and state that the proposed Project would have a significant impact on forestry or agricultural resources if construction and/or operation of the Project would:

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

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

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

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

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

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

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

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

### 4.2.4 Impact Analysis

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

As mapped by the CDC's FMMP (see Figure 4.2-1), the Project site is mapped as containing approximately 163.48 acres of "Farmland of Local Importance" and 32.57 acres of "Other Lands." Based on the FMMP, the Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Accordingly, the Project would not convert any land designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (i.e., FMMP-designated Farmland) to a non-agricultural use, and no impact would occur.

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

As defined by Riverside County Ordinance No. 625, "lands primarily zoned for agricultural use" include properties that are zoned for A-1 (Light Agriculture), A-P (Light Agriculture with Poultry), A-2 (Heavy Agriculture), A-D (Agriculture-Dairy), or C/V (Citrus/Vineyard). Under existing conditions, the Project site is zoned for "Specific Plan Zone (SP Zone)." The adopted Keller Crossing Specific Plan No. 380 Zoning Ordinance allows for residential, mixed use, commercial retail, and open space land uses, and does not zone any portion of the Project site for agricultural production. The existing zoning classifications are not considered agricultural zones pursuant to Section 4.b of Riverside County Ordinance No. 625, and are intended to allow for non-agricultural uses. As such, the Project would not conflict with existing agricultural zoning, and no impact would occur.

Under existing conditions, agricultural activities occur across the flatter portions of the southern portions of the Project site. With implementation of the Project, agricultural uses on site would be precluded. Although the Project would conflict with existing agricultural uses on site, the Project site is designated for urban development by the Riverside County General Plan, Southwest Area Plan (SWAP), and SP 380. Thus, while the Project would preclude future agricultural uses on site, such conversion was anticipated by the General Plan, SWAP, and SP 380. Furthermore, impacts associated with development of the Project site as proposed have been evaluated throughout this EIR, and mitigation measures have been identified to reduce the Project's impacts to the maximum feasible extent. Accordingly, Project impacts due to the elimination of existing agricultural uses on site would be less than significant.

According to Riverside County GIS, the Project site is not included in any agricultural preserves, and is not subject to a Williamson Act contract. The nearest land within an Agricultural Preserve or subject to a Williamson Act Contract occurs approximately 0.6-mile east of the Project site ("Winchester No. 2") (RCIT, n.d.). Due to distance between the Project site and the Winchester No. 2 Agricultural Preserve, the Project

has no potential to conflict with a Williamson Act contract or land within a Riverside County Agricultural Preserve, and impacts would be less than significant.

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

Riverside County Ordinance No. 625 defines "land zoned for primarily agricultural purposes" as including the following zone classifications established by the Riverside County Land Use Ordinance No. 348: A-1 (Light Agriculture); A-P (Light Agriculture with Poultry); A-2 (Heavy Agriculture); A-D (Agriculture-Dairy); and C/V (Citrus/Vineyard). According to Riverside County GIS, the nearest property that allows for agriculture use as defined by Ordinance No. 625 occurs approximately 150 feet east of the Project site (east of Highway 79) and is zoned "Light Agriculture (A-1)" (RCIT, n.d.). However, the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. Mandatory compliance with Ordinance No. 625 would ensure that Project-related construction and operational activities would not indirectly cause or contribute to the conversion of off-site farmland to non-agricultural use. Based on the mandatory compliance with Ordinance No, 625, impacts would be less than significant.

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

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

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

The Project site and surrounding areas are not zoned for forest land (as defined in Public Resources Code 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)) (RCIT, n.d.). As such, the Project has no potential to conflict with such zoning, and no impact would occur.

According to Figure 4.5.2 (Forestry Resources Western Riverside County) of Riverside County EIR No. 521, which was prepared in conjunction with the County's 2015 General Plan Update, the Project site does not contain any forestry resources under existing conditions. The nearest areas containing forests occur within the Cleveland National Forest, located approximately 12.1 miles southwest of the Project site; however, no timber production occurs in association with the Cleveland National Forest. (Riverside County, 2015, Figure 4.5.2). Based on a review of aerial imagery, there are no forestry-related uses within the vicinity of the Project site (Google Earth, 2025). As such, the Project has no potential to result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

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

### 4.2.5 Cumulative Impact Analysis

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

As discussed under Threshold a., the Project would not convert any land designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use as defined by State CEQA Guidelines Appendix G Section II(a) and the FMMP, and no impact would occur. As such, cumulatively-considerable impacts would not occur.

The Project site is not currently zoned for agricultural production. Thus, the Project would not result in a conflict with existing agricultural zoning, and impacts would therefore be less-than-cumulatively considerable. Although the Project would result in the discontinuation of agricultural activities on the southern portions of the Project site, the Project site is designated for urban development by the General Plan, SWAP, and SP 380. Thus, while the Project would preclude future agricultural uses on site, such conversion was anticipated by the General Plan, SWAP, and SP 380. Although other cumulative developments could result in the future conversion of areas planned for agricultural use to non-agricultural use, because the Project site is designated for future urban development, impacts due to the loss of agricultural uses on site would be less than significant on a cumulatively-considerable basis.

According to Riverside County GIS, the Project site is not included in any agricultural preserves, and is not subject to a Williamson Act contract. The nearest land within an Agricultural Preserve or subject to a Williamson Act Contract occurs approximately 0.6-mile east of the Project site ("Winchester No. 2") (RCIT, n.d.). Due to distance between the Project site and the Winchester No. 2 site, the Project has no potential to conflict with a Williamson Act contract or land within a Riverside County Agricultural Preserve, and impacts would be less than significant on a cumulatively-considerable basis.

The Project would involve development of non-agricultural uses within 300 feet of agriculturally-zoned property. Other cumulative developments within the region also have the potential to introduce non-agricultural uses within 300 feet of agriculturally-zoned property. However, the Project and other cumulative developments within the County would be subject to the provisions of Riverside County Ordinance No. 625. As such, impacts due to a conflict with Riverside County Ordinance No. 625 would be less-than-cumulatively considerable.

There are no components of the proposed Project that could indirectly result in the conversion of nearby Farmland to non-agricultural uses. As such, Project impacts due to such conversion would be less-than-cumulatively considerable.

No lands in the Project vicinity are 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, cumulatively-considerable impacts due to a conflict with existing zoning for, or rezoning of, forest land would not occur. The Project also would not result in the loss of forest land or conversion of forest land to non-forest use, and cumulatively-considerable impacts would not occur. There are no components of the Project that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use; thus, cumulatively-considerable impacts would not occur.

### 4.2.6 Significance of Impacts Before Mitigation

Threshold a.: No Impact. The Project would result in direct and indirect permanent impacts to 163.48 acres of "Farmland of Local Importance," and 32.57 acres of "Other Lands." Accordingly, the Project would not convert any land designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use as defined by the FMMP, and no impact would occur.

Threshold b.: Less-than-Significant Impact. The Project site is not zoned for agricultural production. As such, the Project would not conflict with existing agricultural zoning, and no impact would occur. Under existing conditions, agricultural activities occur across the flatter areas within the southern portions of the Project site. With implementation of the Project, agricultural uses on site would be precluded. Although the Project would conflict with existing agricultural uses on site, the Project site is designated for urban development by the Riverside County General Plan, SWAP, and SP 380. Thus, while the Project would preclude future agricultural uses on site, such conversion was anticipated by the General Plan, SWAP, and SP 380. Accordingly, Project impacts due to the elimination of existing agricultural uses on site would be less than significant. Additionally, the Project site is not subject to a Williamson Act contract and is not located within any County Agricultural Preserves, and there are no components of the proposed Project that have the potential to adversely affect agricultural operations at the nearest agricultural preserve/Williamson Act-contracted lands. As such, Project impacts to agricultural preserves and Williamson Act-contracted lands would be less than significant.

Threshold c.: Less-than-Significant Impact. The Project would result in the introduction of non-agricultural uses within 300 feet of agriculturally zoned property. However, the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. Mandatory compliance with Ordinance No. 625 would ensure that Project-related construction and operational activities would not indirectly cause or contribute to the conversion of off-site farmland to non-agricultural use.

Threshold d.: Less-than-Significant Impact. The Project would be subject to Riverside County Ordinance No. 625, which would ensure that the urban land uses proposed by the Project would not conflict with existing agricultural operations in the surrounding area, and also would ensure the Project does not result in the conversion of the surrounding agricultural lands to non-agricultural use. There are no components of the Project that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use. Accordingly, impacts would be less than significant.

Thresholds e., f., and g.: No Impact. 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)). The Project would not result in the conversion of forest land to non-forest use. No impact would occur.

### 4.2.7 Regulations, Design Requirements, and Mitigation

***Applicable Regulations and Design Requirements***

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

- The Project is required to comply with Riverside County Ordinance No. 625, which requires that when residential uses are developed adjacent to properties zoned primarily for agricultural purposes (that support agricultural operations that have been in place for at least three years and not considered a nuisance operation at the time the operation began), future homebuyers must be notified of any agricultural operations that are on-going in the area, and mandate that such agricultural uses shall not be the subject of nuisance complaints.

***Mitigation***

The Project would result in less than significant impacts to agriculture and forestry resources; therefore, mitigation measures are not required.

### 4.2.8 References


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# 4.3 AIR QUALITY

This Subsection 4.3 is based on two technical reports prepared by Urban Crossroads, Inc. (herein, "Urban Crossroads"). The first report addresses the Project's potential to result in regional and localized air quality impacts, is titled, "Keller Crossing Air Quality Impact Analysis" (herein, "AQIA"), is dated January 27, 2026, and is included as *Technical Appendix B1* to this EIR (Urban Crossroads, 2026). The second report addresses the Project's potential to result in near-term construction-related health risk impacts to nearby sensitive receptors, is titled, "Keller Crossing Specific Plan Construction Health Risk Assessment" (herein "HRA"), is dated April 3, 2025, and is included as *Technical Appendix B2* to this EIR (Urban Crossroads, 2025a). Refer to Section 7.0, References, for a complete list of reference sources.

## 4.3.7 Existing Conditions

### E. South Coast Air Basin

The Project site is located in the South Coast Air Basin (SCAB) within the jurisdiction of SCAQMD. The SCAQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and state air quality standards. As noted above, the Project site is located within the SCAB, a 6,745-square-mile subregion of the SCAQMD, which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the San Diego Air Basin to the south. (Urban Crossroads, 2026, p. 9)

### F. Regional Climate

The regional climate has a substantial influence on air quality in the SCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence the air quality. The annual average temperatures throughout the SCAB vary from the low to mid 60 degrees Fahrenheit (°F). Due to a decreased marine influence, the eastern portion of the SCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SCAB have recorded maximum temperatures above 100°F. (Urban Crossroads, 2026, p. 9)

Although the climate of the SCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SCAB climate. Humidity restricts visibility in the SCAB, and the conversion of sulfur dioxide ($SO_2$) to sulfates ($SO_4$) is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity within the SCAB is 71% along the coast and 59% inland. Since the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast. (Urban Crossroads, 2026, p. 9)

More than 90% of the SCAB's rainfall occurs from November through April. The annual average rainfall varies from approximately nine inches in Riverside to fourteen inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SCAB with frequency being higher near the coast. Due to its generally clear weather, about three-quarters of available sunshine is received in the SCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. On the shortest day of the year, there are approximately 10 hours of possible sunshine, and on the longest day of the year, there are approximately 14½ hours of possible sunshine. (Urban Crossroads, 2026, pp. 9-10)

The importance of wind to air pollution is considerable. The direction and speed of the wind determines the horizontal dispersion and transport of the air pollutants. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. Nighttime drainage begins with the radiational cooling of the mountain slopes. Heavy, cool air descends the slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean. Another characteristic wind regime in the SCAB is the "Catalina Eddy," a low level cyclonic (counterclockwise) flow centered over Santa Catalina Island which results in an offshore flow to the southwest. On most spring and summer days, some indication of an eddy is apparent in coastal sections. (Urban Crossroads, 2026, p. 10)

In the SCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level. (Urban Crossroads, 2026, p. 10)

A second inversion-type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter, when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as nitrogen oxides ($NO_X$) and carbon monoxide (CO) from vehicles, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline. (Urban Crossroads, 2026, p. 10)

### G. Wind Patterns

The distinctive climate of the Project area and the SCAB is determined by its terrain and geographical location. The SCAB is located in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter. Wind patterns across the south coastal region are characterized by westerly and southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Winds are characteristically light although the speed is somewhat greater during the dry summer months than during the rainy winter season. (Urban Crossroads, 2026, pp. 10-11)

### H. Criteria Pollutants

Criteria pollutants are pollutants that are regulated through the development of human health based and/or environmentally based criteria for setting permissible levels. Criteria pollutants, their typical sources, and health effects are identified in Table 4.3-2, *Criteria Pollutants*. (Urban Crossroads, 2026, p. 11)

**Table 4.3-2 Criteria Pollutants**

| Criteria Pollutant | Description | Sources | Health Effects |
|---|---|---|---|
| CO | CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone ($O_3$), motor vehicles operating at slow speeds are the primary source of CO in the SCAB. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. | Any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment and residential heating. | Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of decreased oxygen ($O_2$) supply to the heart. Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with $O_2$ transport and competing with $O_2$ to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for $O_2$ supply can be adversely affected by exposure to CO. Individuals most at risk include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia ($O_2$ deficiency) as seen at high altitudes. |
| $SO_2$ | $SO_2$ is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from | Coal or oil burning power plants and industries, refineries, diesel | A few minutes of exposure to low levels of $SO_2$ can result in airway constriction in some asthmatics, all of whom are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well |

| Criteria Pollutant | Description | Sources | Health Effects |
|---|---|---|---|
| | chemical processes occurring at chemical plants and refineries. When $SO_2$ oxidizes in the atmosphere, it forms $SO_4$. Collectively, these pollutants are referred to as sulfur oxides ($SO_X$). | engines | as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to $SO_2$. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of $SO_2$.<br><br>Animal studies suggest that despite $SO_2$ being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.<br><br>Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient $SO_2$ levels. In these studies, efforts to separate the effects of $SO_2$ from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically, or one pollutant alone is the predominant factor. |
| $NO_X$ | $NO_2$ is a key component of nitrogen oxides ($NO_X$), which also includes nitric oxide (NO) and nitrous oxide ($N_2O$). $NO_X$ compounds are primarily produced during combustion processes when nitrogen ($N_2$) reacts with oxygen ($O_2$). Both NO and $NO_2$ serve as precursors in the formation of $O_3$ and $PM_{2.5}$, making their monitoring crucial for air quality assessments.<br><br>$NO_2$, being the more abundant form of $NO_X$ in the atmosphere, has a relatively short lifespan of one to seven days, which enhances its significance as a major air pollutant. | Any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment and residential heating. | Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to $NO_2$ at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to $NO_2$ in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater |

| Criteria Pollutant | Description | Sources | Health Effects |
|---|---|---|---|
| | As a criteria air pollutant, $NO_2$ poses various health risks, including respiratory issues and increased vulnerability to infections. It also absorbs blue light, imparting a brownish-red hue to the atmosphere and contributing to reduced visibility and smog formation.<br><br>Given that NO emissions largely convert to $NO_2$, the examination of $NO_X$ emissions becomes essential when assessing potential air quality impacts. The concentrations of $NO_2$ are closely related to traffic density, often resulting in higher exposure levels for commuters in heavy traffic compared to what regional monitoring stations may indicate. | | susceptibility of these sub-groups.<br><br>In animals, exposure to levels of $NO_2$ considerably higher than ambient concentrations result in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of $O_3$ exposure increases when animals are exposed to a combination of $O_3$ and $NO_2$. |
| $O_3$ | $O_3$ is a highly reactive and unstable gas that is formed when VOCs and $NO_X$, both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. $O_3$ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. | Formed when ROGs and $NO_X$ react in the presence of sunlight. ROG sources include any source that burns fuels, (e.g., gasoline, natural gas, wood, oil) solvents, petroleum processing and storage and pesticides. | Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible subgroups for $O_3$ effects. Short term exposure (lasting for a few hours) to $O_3$ at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated $O_3$ levels are associated with increased school absences. In recent years, a correlation between elevated ambient $O_3$ levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple outdoor sports and reside in communities with high $O_3$ levels. |

| Criteria Pollutant | Description | Sources | Health Effects |
|---|---|---|---|
| | | | $O_3$ exposure under exercising conditions is known to increase the severity of the responses described above. Animal studies suggest that exposure to a combination of pollutants that includes $O_3$ may be more toxic than exposure to $O_3$ alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes. |
| Particulate Matter | $PM_{10}$: A major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. Particulate matter pollution is a major cause of reduce visibility (haze) which is caused by the scattering of light and consequently the significant reduction air clarity. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects. Additionally, it should be noted that $PM_{10}$ is considered a criteria air pollutant.<br><br>$PM_{2.5}$: A similar air pollutant to $PM_{10}$ consisting of tiny solid or liquid particles which are 2.5 microns or smaller (which is often referred to as fine particles). These particles are formed in the atmosphere from primary gaseous emissions that include $SO_4$ formed from $SO_2$ release from power plants and industrial facilities and nitrates that are formed from $NO_X$ release from power plants, automobiles, and other types of combustion sources. The chemical composition of fine | Sources of $PM_{10}$ include road dust, windblown dust and construction. Also formed from other pollutants (acid rain, $NO_X$, $SO_X$, organics). Incomplete combustion of any fuel.<br><br>$PM_{2.5}$ comes from fuel combustion in motor vehicles, equipment, and industrial sources, residential and agricultural burning. Also formed from reaction of other pollutants (acid rain, $NO_X$, $SO_X$, organics). | A consistent correlation between elevated ambient fine particulate matter ($PM_{10}$ and $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in lifespan, and an increased mortality from lung cancer.<br><br>Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long term exposure to particulate matter.<br><br>The elderly, people with preexisting respiratory or cardiovascular disease, and children appear to be more |

| Criteria Pollutant | Description | Sources | Health Effects |
|---|---|---|---|
| | particles highly depends on location, time of year, and weather conditions. $PM_{2.5}$ is a criteria air pollutant. | | susceptible to the effects of high levels of $PM_{10}$ and $PM_{2.5}$. |
| VOC | VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form $O_3$ to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to $O_3$, which is a criteria pollutant. The terms VOC and ROG (see below) interchangeably. | Organic chemicals are widely used as ingredients in household products. Paints, varnishes, and wax all contain organic solvents, as do many cleaning, disinfecting, cosmetic, degreasing and hobby products. Fuels are made up of organic chemicals. All of these products can release organic compounds while you are using them, and, to some degree, when they are stored. | Breathing VOCs can irritate the eyes, nose, and throat, can cause difficulty breathing and nausea, and can damage the central nervous system as well as other organs. Some VOCs can cause cancer. Not all VOCs have all these health effects, though many have several. |
| ROG | Similar to VOC, ROGs are also precursors in forming $O_3$ and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and $NO_X$ react in the presence of sunlight. ROGs are a criteria pollutant since they are a precursor to $O_3$, which is a criteria pollutant. The terms ROG and VOC (see | Sources similar to VOCs. | Health effects similar to VOCs. |

| Criteria Pollutant | Description | Sources | Health Effects |
|---|---|---|---|
| | previous) interchangeably. | | |
| Lead (Pb) | Pb is a heavy metal that is highly persistent in the environment and is considered a criteria pollutant. In the past, the primary source of Pb in the air was emissions from vehicles burning leaded gasoline. The major sources of Pb emissions are ore and metals processing, particularly Pb smelters, and piston-engine aircraft operating on leaded aviation gasoline. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. It should be noted that the Project does not include operational activities such as metal processing or Pb acid battery manufacturing. As such, the Project is not anticipated to generate a quantifiable amount of Pb emissions. | Metal smelters, resource recovery, leaded gasoline, deterioration of Pb paint. | Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased Pb levels are associated with increased blood pressure.<br><br>Pb poisoning can cause anemia, lethargy, seizures, and death; although it appears that there are no direct effects of Pb on the respiratory system. Pb can be stored in the bone from early age environmental exposure, and elevated blood Pb levels can occur due to breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland) and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of Pb because of previous environmental Pb exposure of their mothers. |
| Odor | Odor means the perception experienced by a person when one or more chemical substances in the air come into contact with the human olfactory nerves. | Odors can come from many sources including animals, human activities, industry, natures, and vehicles. | Offensive odors can potentially affect human health in several ways. First, odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Second, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system. Finally, unpleasant odors can trigger memories or attitudes linked to unpleasant odors, causing cognitive and emotional effects such as stress. |

(Urban Crossroads, 2026, Table 2-1 and Table 2-2)

## I. Existing Air Quality

Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect are shown in Table 4.3-3, *Ambient Air Quality Standards*. (Urban Crossroads, 2026, p. 18)

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the state and federal standards. At the time of this AQIA, the most recent state and federal standards were updated by CARB on July 16, 2024, and are presented in Table 4.3-3. The air quality in a region is considered to be in attainment by the state if the measured ambient air pollutant levels for $O_3$, CO (except 8-hour Lake Tahoe), $SO_2$ (1 and 24 hour), $NO_2$, $PM_{10}$, and $PM_{2.5}$ are not to be exceeded. All others are not to be equaled or exceeded. It should be noted that the three-year period is presented for informational purposes and is not the basis for how the state assigns attainment status. Attainment status for a pollutant means that the SCAQMD meets the standards set by the EPA or the California EPA (CalEPA). Conversely, nonattainment means that an area has monitored air quality that does not meet the NAAQS or CAAQS standards. In order to improve air quality in nonattainment areas, a State Implementation Plan (SIP) is drafted by CARB. The SIP outlines the measures that the state will take to improve air quality. Once nonattainment areas meet the standards and additional redesignation requirements, the EPA will designate the area as a maintenance area. (Urban Crossroads, 2026, p. 18)

## J. Regional Air Quality

Air pollution contributes to a wide variety of adverse health effects. The EPA has established NAAQS for seven of the most common air pollutants: CO, Pb, $O_3$, $PM_{10}$, $PM_{2.5}$, $NO_2$, and $_{SO2}$, which are known as criteria pollutants. The SCAQMD monitors levels of various criteria pollutants at 35 permanent monitoring stations and 2 single-pollutant source Pb air monitoring sites throughout the air district. On January 25, 2024, CARB adopted the proposed 2023 amendments to the State and national area designations. Table 4.3-4, *Attainment Status of Criteria Pollutants in the SCAB*, shows the attainment designations for the SCAB. (Urban Crossroads, 2026, p. 21)

## K. Local Air Quality

The SCAQMD has designated general forecast areas and air monitoring areas (referred to as Source Receptor Areas [SRA]) throughout the district in order to provide information regarding air quality conditions to Southern California residents. The Project site is located within SRA 26. It should be noted that the monitoring station within SRA 26 only reports air quality data for $O_3$; as such the following stations have been used to report air quality data for CO, $NO_2$, $PM_{10}$, and $PM_{2.5}$:

- SRA 26, Temecula Valley, is located 3.30 miles southeast of the Project site), and was used to obtain local air quality data related to $O_3$;

**Table 4.3-3 Ambient Air Quality Standards**

| Ambient Air Quality Standards | | | | | | |
|---|---|---|---|---|---|---|
| **Pollutant** | **Averaging Time** | **California Standards** [1] | | **National Standards** [2] | | |
| | | **Concentration** [3] | **Method** [4] | **Primary** [3,5] | **Secondary** [3,6] | **Method** [7] |
| **Ozone ($O_3$)**[8] | 1 Hour | 0.09 ppm (180 µg/m³) | Ultraviolet Photometry | — | Same as Primary Standard | Ultraviolet Photometry |
| | 8 Hour | 0.070 ppm (137 µg/m³) | | 0.070 ppm (137 µg/m³) | | |
| **Respirable Particulate Matter (PM10)**[9] | 24 Hour | 50 µg/m³ | Gravimetric or Beta Attenuation | 150 µg/m³ | Same as Primary Standard | Inertial Separation and Gravimetric Analysis |
| | Annual Arithmetic Mean | 20 µg/m³ | | — | | |
| **Fine Particulate Matter(PM2.5)**[9] | 24 Hour | — | — | 35 µg/m³ | Same as Primary Standard | Inertial Separation and Gravimetric Analysis |
| | Annual Arithmetic Mean | 12 µg/m³ | Gravimetric or Beta Attenuation | 9.0 µg/m³ | 15.0 µg/m³ | |
| **Carbon Monoxide (CO)** | 1 Hour | 20 ppm (23 mg/m³) | Non-Dispersive Infrared Photometry (NDIR) | 35 ppm (40 mg/m³) | — | Non-Dispersive Infrared Photometry (NDIR) |
| | 8 Hour | 9.0 ppm (10 mg/m³) | | 9 ppm (10 mg/m³) | — | |
| | 8 Hour (Lake Tahoe) | 6 ppm (7 mg/m³) | | — | — | |
| **Nitrogen Dioxide ($NO_2$)**[10] | 1 Hour | 0.18 ppm (339 µg/m³) | Gas Phase Chemiluminescence | 100 ppb (188 µg/m³) | — | Gas Phase Chemiluminescence |
| | Annual Arithmetic Mean | 0.030 ppm (57 µg/m³) | | 53 ppb (100 µg/m³) | Same as Primary Standard | |
| **Sulfur Dioxide ($SO_2$)**[11] | 1 Hour | 0.25 ppm (655 µg/m³) | Ultraviolet Fluorescence | 75 ppb (196 µg/m³) | — | Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method) |
| | 3 Hour | — | | — | 0.5 ppm(1300 µg/m³) | |
| | 24 Hour | 0.04 ppm (105 µg/m³) | | 0.14 ppm(for certain areas)[11] | — | |
| | Annual Arithmetic Mean | — | | 0.030 ppm(for certain areas)[11] | — | |
| **Lead**[12,13] | 30 Day Average | 1.5 µg/m³ | Atomic Absorption | — | — | High Volume Sampler and Atomic Absorption |
| | Calendar Quarter | — | | 1.5 µg/m³(for certain areas)[12] | Same as Primary Standard | |
| | Rolling 3-Month Average | — | | 0.15 µg/m³ | | |
| **Visibility Reducing Particles**[14] | 8 Hour | See footnote 14 | Beta Attenuation and Transmittance through Filter Tape | **No** | | |
| **Sulfates** | 24 Hour | 25 µg/m³ | Ion Chromatography | **National** | | |
| **Hydrogen Sulfide** | 1 Hour | 0.03 ppm (42 µg/m³) | Ultraviolet Fluorescence | **Standards** | | |
| **VinylChloride**[12] | 24 Hour | 0.01 ppm (26 µg/m³) | Gas Chromatography | | | |

**See footnotes on next page ...**

**Table 4.3-3 Ambient Air Quality Standards (Cont'd)**

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter ($PM_{10}$, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m3 is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. On February 7, 2024, the national annual PM2.5 primary standard was lowered from 12.0 µg/m3 to 9.0 µg/m3. The existing national 24- hour PM2.5 standards (primary and secondary) were retained at 35 µg/m3, as was the annual secondary standard of 15.0 µg/m3. The existing 24-hour PM10 standards (primary and secondary) of 150 µg/m3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour SO2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

    Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

(CARB, 2024)

**Table 4.3-4 Attainment Status of Criteria Pollutants in the SCAB**

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

Note: See Appendix 2.1 to the Project's AQIA (*Technical Appendix B1*) for a detailed map of State/National Area Designations within the SCAB
"-" = No standard.
(Urban Crossroads, 2026, Table 2-4)

- SRA 25, Lake Elsinore Area, is located 13.63 miles northwest of the Project site), and was used to obtain local air quality data related to CO, $NO_2$, and $PM_{10}$.
- SRA 23, Metropolitan Riverside County 1, is located 31.15 miles northwest of the Project site), and was used to obtain local air quality data related to $PM_{2.5}$.

Data from the Lake Elsinore Area and Metropolitan Riverside County 1 monitoring stations were utilized only in instances where data was not available from the Temecula Valley monitoring station. (Urban Crossroads, 2026, p. 21)

The most recent three (3) years of data available is shown in Table 4.3-5, *Project Area Air Quality Monitoring Summary 2021-2023*, and identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the Project site. Data for $O_3$, CO, $NO_2$, $PM_{10}$, and $PM_{2.5}$ for 2021 through 2023 was obtained from the SCAQMD Air Quality Data Tables. Additionally, data for $SO_2$ has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure $SO_2$ concentrations. (Urban Crossroads, 2026, p. 22)

### 4.3.8 Applicable Regulatory Requirements

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

[1] The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB.

**Table 4.3-5 Project Area Air Quality Monitoring Summary 2021-2023**

| Pollutant | Standard | Year | | |
|---|---|---|---|---|
| | | 2021 | 2022 | 2023 |
| $O_3$ | | | | |
| Maximum Federal 1-Hour Concentration (ppm) | | 0.095 | 0.087 | 0.088 |
| Maximum Federal 8-Hour Concentration (ppm) | | 0.083 | 0.079 | 0.082 |
| Number of Days Exceeding State 1-Hour Standard | > 0.09 ppm | 11 | 0 | 0 |
| Number of Days Exceeding State/Federal 8-Hour Standard | > 0.070 ppm | 1 | 4 | 3 |
| CO | | | | |
| Maximum Federal 1-Hour Concentration | > 35 ppm | 0.9 | 0.9 | 1.3 |
| Maximum Federal 8-Hour Concentration | > 20 ppm | 0.8 | 0.6 | 0.7 |
| $NO_2$ | | | | |
| Maximum Federal 1-Hour Concentration | > 0.100 ppm | 0.044 | 0.037 | 0.042 |
| Annual Federal Standard Design Value | | 0.007 | 0.007 | 0.007 |
| $PM_{10}$ | | | | |
| Maximum Federal 24-Hour Concentration (µg/m$^3$) | > 150 µg/m$^3$ | 89 | 91 | 186 |
| Annual Federal Arithmetic Mean (µg/m$^3$) | | 21.4 | 19.8 | 20.8 |
| Number of Days Exceeding Federal 24-Hour Standard | > 150 µg/m$^3$ | 0 | 0 | 1 |
| Number of Days Exceeding State 24-Hour Standard | > 50 µg/m$^3$ | 4 | 1 | 5 |
| $PM_{2.5}$ | | | | |
| Maximum Federal 24-Hour Concentration (µg/m$^3$) | > 35 µg/m$^3$ | 82.1 | 38.5 | 48.7 |
| Annual Federal Arithmetic Mean (µg/m$^3$) | > 12 µg/m$^3$ | 12.58 | 10.80 | 10.47 |
| Number of Days Exceeding Federal 24-Hour Standard | > 35 µg/m$^3$ | 10 | 1 | 1 |

ppm = Parts Per Million
µg/m$^3$ = Microgram per Cubic Meter
Source: Data for $O_3$, CO, $NO_2$, $PM_{10}$, and $PM_{2.5}$ was obtained from SCAQMD Air Quality Data Tables.
(Urban Crossroads, 2026, Table 2-5)

## A. Federal Regulations

### *1. Federal Clean Air Act*

The Clean Air Act (CAA; 42 U.S.C. § 7401 et seq.) is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes the Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) to protect public health and public welfare and to regulate emissions of hazardous air pollutants, which include ozone ($O_3$), carbon monoxide (CO), nitrogen dioxide ($NO_x$), sulfur dioxide ($SO_2$), particulate matter ($PM_{10}$), $PM_{2.5}$, and lead (Pb).

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

The sections of the federal CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions address the urban air pollution problems of $O_3$ (smog), CO, and $PM_{10}$. Specifically, it clarifies how areas are designated and re-designated "attainment." It also allows EPA to define the boundaries of "nonattainment" areas: geographical areas whose air quality does not meet Federal air quality standards designed to protect public health (EPA, 2024). Mobile source emissions are regulated in accordance with the CAA Title II provisions. These standards are intended to reduce tailpipe emissions of hydrocarbons, CO, and $NO_X$ on a phased-in basis that began in model year 1994. Automobile manufacturers also are required to reduce vehicle emissions resulting from the evaporation of gasoline during refueling. These provisions further require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas.

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

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

### *2. National Emissions Standards for Hazardous Air Pollutants (NESHAPS) Program*

National Emission Standards for Hazardous Air Pollutants (NESHAP) are stationary source standards for hazardous air pollutants. Hazardous air pollutants (HAPs) are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. The EPA develops national enforcement initiatives that focus on significant environmental risks and noncompliance patterns. For Fiscal Years 2014 to 2016, the Cutting Hazardous Air Pollutants National Initiatives Strategy focuses on categories of sources that emit HAPs.

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

## B. State Regulations

### *1. California Clean Air Act (CCAA)*

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

### *2. Air Toxic Hot Spots Act*

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

### *3. Air Quality Management Planning*

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

to State and federal ambient air quality standards; coordination with local agencies on transportation plans and strategies; and providing assistance to local districts and transportation agencies.

### *4. California Air Resources Board Rules*

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

- CARB Rule 2480 (13 CCR 2480): Airborne Toxics Control Measure to Limit School Bus Idling and Idling at Schools, which limits nonessential idling for commercial trucks and school buses within 100 feet of a school.
- CARB Rule 2485 (13 CCR 2485): Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling, which limits nonessential idling to five minutes or less for commercial trucks.
- CARB Rule 2449 (13 CCR 2449): In-Use Off-Road Diesel Idling Restricts, which limits nonessential idling to five minutes or less for diesel-powered off-road equipment.

### *5. South Coast Air Quality Management District Rules*

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

- SCAQMD Rule 201: Permit to Construct
- SCAQMD Rule 402: Nuisance Odors
- SCAQMD Rule 403: Fugitive Dust
- SCAQMD Rule 431.2: Low Sulfur Fuel
- SCAQMD Rule 1113: Table of Standards
- SCAQMD Rule 1186: $PM_{10}$ Emissions from Paved and Unpaved Roads, and Livestock Operations
- SCAQMD Rule 1403: Asbestos Emissions from Demolition/Renovation Activities

### *6. Truck & Bus Regulation*

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

gross vehicle weight rating of 14,001 to 26,000 pounds) adhered to a similar schedule and were all replaced by 2020.

### *7. Disadvantaged Communities (Senate Bill 535; 2012)*

Senate Bill 535 ("SB 535"; De León, Chapter 830, 2012) recognizes the potential vulnerability of low-income and disadvantaged communities to poor air quality. Disadvantaged communities in California are specifically targeted for investment of proceeds from the State's cap-and-trade program. These investments are aimed at improving public health, quality of life, and economic opportunity in California's most burdened communities while at the same time reducing pollution that causes climate change. Authorized by the California Global Warming Solutions Act of 2006 (AB 32), the State's cap-and-trade program is one of several strategies that California uses to reduce greenhouse gas emissions that cause climate change. The funds must be used for programs that further reduce emissions of greenhouse gases. SB 535 requires that 25 percent of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. The California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen).

### *8. Environmental Justice in Local Land Use Planning (Senate Bill 1000; 2016)*

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

### *9. Community Air Protection Program (Assembly Bill 617; 2017)*

Assembly Bill 617 (AB 617) was enacted into law in 2017 as an environmental justice initiative aimed at reducing air pollution from sources other than vehicles in communities most burdened by poor air quality. In response to AB 617, the CARB established the Community Air Protection Program (CAPP or Program). Since its enactment, CARB has selected multiple communities across California for focused action under

AB 617. These communities have developed and implemented Community Emissions Reduction Programs (CERPs) tailored to their specific needs and pollution sources and aimed at emission reductions and improved air quality monitoring. The program has also facilitated greater community involvement in air quality decision-making processes. AB 617 also included new requirements for accelerated retrofit of pollution controls on industrial sources, increased penalty fees, and greater transparency and availability of air quality and emissions data, which is helping to advance air pollution control efforts throughout the State. (CARB, 2023)

## C. Regional Regulations

### *1. SCAQMD Air Quality Management Plan*

The NAAQS and CAAQS are exceeded in most parts of the SCAB. In response, and in conformance with California Health & Safety Code Section 40702 *et seq*. and the CCAA, the South Coast Air Quality Management District (SCAQMD) adopted an AQMP to plan for the improvement of regional air quality. AQMPs are updated regularly in order to reduce emissions and accommodate growth more effectively. Each version of the plan is an update of the previous plan and has a 20-year horizon with a revised baseline. The SCAQMD's most recent iteration of the AQMP, *2022 Air Quality Management Plan (2022 AQMP)*, was adopted in December 2022.

## D. Local Regulations

### *1. Riverside County General Plan Air Quality Element*

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

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

**AQ 1.4**: Coordinate with the SCAQMD and [Mojave Desert Air Quality Management District (MDAQMD)] to ensure that all elements of air quality plans regarding reduction of air pollutant emissions are being enforced.

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

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

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

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

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

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

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

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

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

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

### 4.3.9 Basis for Determining Significance

#### A. Thresholds of Significance

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

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

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

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

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

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

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

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

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

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

Threshold c. addresses Section III.c of Appendix G to the State CEQA Guidelines. Under this threshold, impacts would be potentially significant if emissions are projected to exceed the Localized Significance Thresholds (LSTs) established by the State of California and the SCAQMD for criteria pollutants, if the Project would cause or contribute to CO "Hot Spots," or if the Project would result in near-term construction-related health risk impacts exceeding the SCAQMD thresholds of significance of 10 in one million for cancer risks and 1.0 for non-cancer health risks.

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

### B. Regional Thresholds

The SCAQMD has developed regional and localized significance thresholds for other regulated pollutants, as summarized in Table 4.3-6, *Regional Emissions Significance Thresholds*. The SCAQMD's CEQA Air Quality Significance Thresholds (March 2023) indicate that any projects in the SCAB with daily emissions that

exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact. (Urban Crossroads, 2026, p. 28)

**Table 4.3-6 Regional Emissions Significance Thresholds**

| Pollutant | Construction | Operations |
|---|---|---|
| **Regional Significance Thresholds** | | |
| $NO_X$ | 100 lbs/day | 55 lbs/day |
| VOC | 75 lbs/day | 55 lbs/day |
| $PM_{10}$ | 150 lbs/day | 150 lbs/day |
| $PM_{2.5}$ | 55 lbs/day | 55 lbs/day |
| $SO_X$ | 150 lbs/day | 150 lbs/day |
| CO | 550 lbs/day | 550 lbs/day |
| Pb | 3 lbs/day | 3 lbs/day |

lbs/day = Pounds Per Day
(Urban Crossroads, 2026, Table 3-1)

### C. Localized Thresholds

#### *1. Localized Thresholds for Construction Activity*

As described in further detail in Subsection 3.6 of the Project's AQIA (*Technical Appendix B*), the analysis of localized air quality impacts makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (LST Methodology). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as Localized Significance Thresholds (LSTs). Table 4.3-7, *Localized Significance Thresholds*, shows the LSTs that were used to evaluate the Project's potential localized construction- and operational-related air quality impacts. (Urban Crossroads, 2026, pp. 39-40)

**Table 4.3-7 Localized Significance Thresholds**

| Pollutant | Construction | Operations |
|---|---|---|
| $NO_X$ | 0.18 ppm | 0.18 ppm |
| CO (1-hour average) | 20 ppm | 20 ppm |
| CO (8-hour average) | 9 ppm | 9 ppm |
| $PM_{10}$ | 10.4 µg/m$^3$ | 2.5 µg/m$^3$ |
| $PM_{2.5}$ | 10.4 µg/m$^3$ | 2.5 µg/m$^3$ |

ppm = Parts Per Million
µg/m$^3$ = Micrograms Per Cubic Meter
(Urban Crossroads, 2026, Table 3-1)

#### *2. Localized Thresholds for CO Emissions*

Based on the SCAQMD's CEQA Air Quality Handbook (1993), a CO hotspot is defined as a localized concentration of carbon monoxide exceeding the State one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm. Accordingly, Project impacts due to localized CO emissions that could

result in a CO hotspot would be significant if the Project's emissions combined with background CO emissions exceed the following California standards for localized CO concentrations: (Urban Crossroads, 2026, p. 45)

- 1-hour CO standard of 20.0 parts per million (ppm)
- 8-hour CO standard of 9.0 ppm

#### *3. Thresholds of Significance for Construction-Related Cancer and Non-Cancer Health Risks*

In accordance with guidelines published by SCAQMD in their publication, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, the proposed Project's localized construction-related incremental cancer risk would be considered significant if it were to exceed the SCAQMD threshold of significance of 10 in one million, or if the Project's non-cancer health risks were to exceed the SCAQMD threshold of 1.0. (SCAQMD, 2003b)

### D. Methodology

#### *1. California Emissions Estimator Model (CalEEMod)*

Land uses such as the Project affect air quality through construction-source and operational- source emissions. In May 2022, the California Air Pollution Control Officers Association (CAPCOA) conjunction with the SCAQMD and other California air districts, released the latest version of the California Emissions Estimator Model (CalEEMod) Version 2022. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, $NO_X$, $SO_X$, CO, $PM_{10}$, and $PM_{2.5}$) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation. Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational air quality emissions. Output from the model runs for both construction and operational activity are provided in Appendices 3.1 of the Project's AQIA (*Technical Appendix B1)*. (Urban Crossroads, 2026, p. 29)

#### *2. Construction Emissions*

Refer to Subsection 3.4 of the Project's AQIA (*Technical Appendix B1*) for a discussion of construction activities, construction duration, and construction equipment assumed as inputs in the analysis of the Project's construction-related air quality impacts. (Urban Crossroads, 2026, pp. 30-36)

#### *3. Operational Emissions*

Refer to Subsection 3.5 of the Project's AQIA (*Technical Appendix B1*) for a discussion of operational emissions sources, mobile-source emission sources, and on-site equipment-related sources that were assumed as inputs in the analysis of the Project's operational-related air quality impacts. (Urban Crossroads, 2026, pp. 36-39)

### *4. Sensitive Receptors*

LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable NAAQS and CAAQS at the nearest residence or sensitive receptor. Receptor locations are off-site locations where individuals may be exposed to emissions from Project activities. Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as "sensitive receptors." These structures typically include uses such as residences, hotels, and hospitals where an individual can remain for 24 hours. Consistent with the LST Methodology, the nearest land use where an individual could remain for 24 hours to the Project site has been used to determine construction and operational air quality impacts for emissions of $PM_{10}$ and $PM_{2.5}$, since $PM_{10}$ and $PM_{2.5}$ thresholds are based on a 24-hour averaging time. (Urban Crossroads, 2026, p. 41)

LSTs apply, even for non-sensitive land uses, consistent with LST Methodology and SCAQMD guidance. Per the LST Methodology, commercial and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain on-site for a full 24 hours but are typically on-site for 8 hours or less. However, LST Methodology explicitly states that "LSTs based on shorter averaging periods, such as the $NO_2$ and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours." Therefore, any adjacent land use where an individual could remain for 1 or 8 hours, that is located at a closer distance to the Project site than the receptor used for $PM_{10}$ and $PM_{2.5}$ analysis, must be considered to determine construction and operational LST air impacts for emissions of $NO_2$ and CO since these pollutants have an averaging time of 1 and 8 hours. (Urban Crossroads, 2026, p. 41)

Receptors in the Project area are described below and shown on Figure 4.3-1, *Sensitive Receptor Locations*. Localized air quality impacts were evaluated at receptor land uses nearest the Project site. All distances are measured from the Project site boundary to the outdoor living areas (e.g., backyards) or at the building façade, whichever is closer to the Project site. (Urban Crossroads, 2026, pp. 41-42)

- Location R1: Location R1 represents the existing residence at 33250 Ashford Lane, approximately 668 feet north of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R1 is placed at the residential building façade.
- Location R2: Location R2 represents the existing residence at 33525 Pourroy Road, approximately 227 feet west of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R2 is placed at the residential building façade.
- Location R3: Location R3 represents the existing residence at 33975 Pourroy Road, approximately 145 feet west of the Project site. R3 is placed at the private outdoor living areas (backyard) facing the Project site.

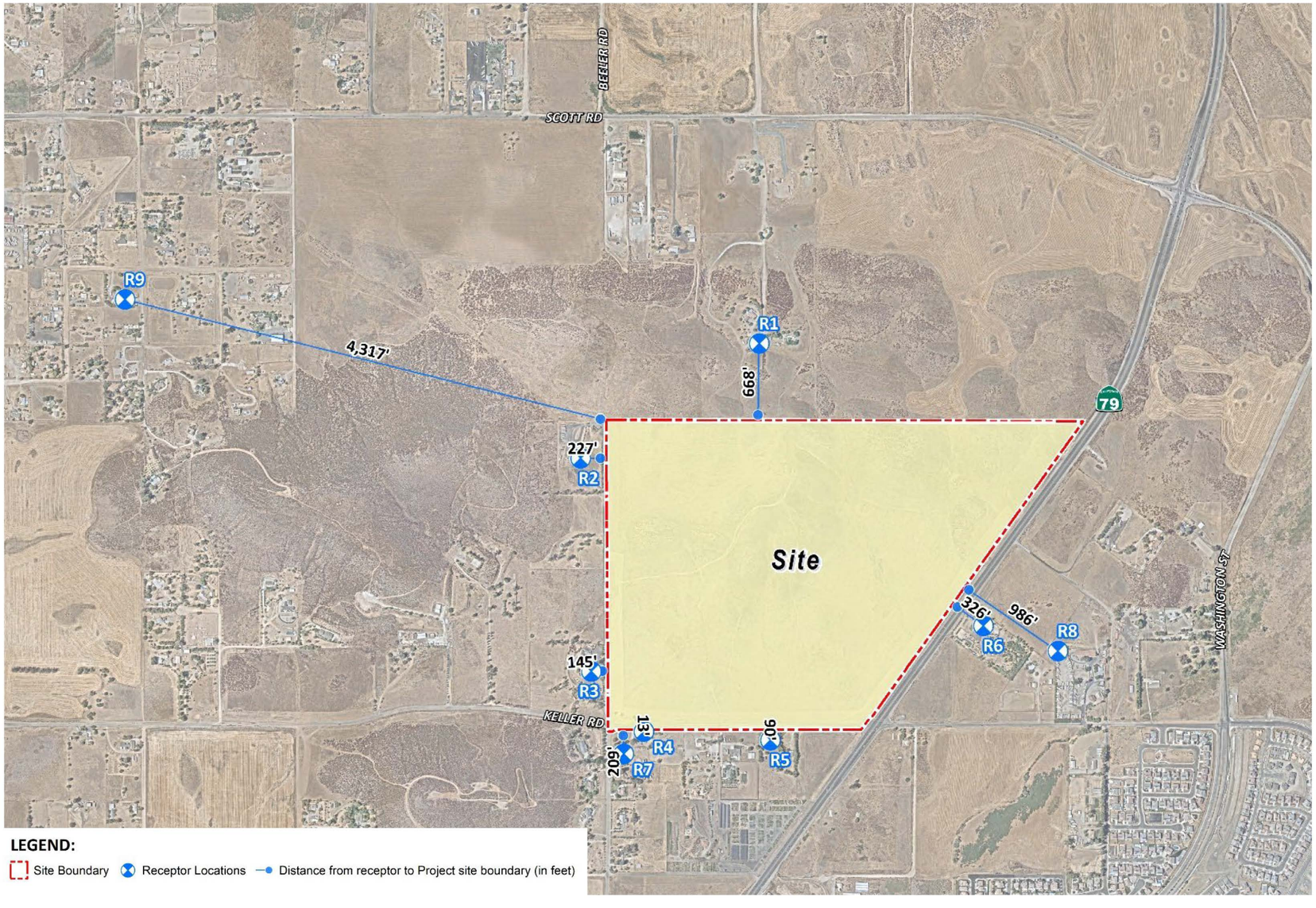
- Location R4: Location R4 represents the existing residence at 32025 Keller Road, approximately 13 feet south of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R4 is placed at the residential building façade.
- Location R5: Location R5 represents the existing residence at 32187 Keller Road, approximately 90 feet south of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R5 is placed at the residential building façade.
- Location R6: Location R6 represents the existing commercial building at 33900 Winchester Road, approximately 326 feet east of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R6 is placed at the building façade.
- Location R7: Location R7 represents the existing residence at 34044 Winchester Road, approximately 209 feet south of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R7 is placed at the residential building façade.
- Location R8: Location R8 represents the existing commercial building, Bill and Dave's Landscape, at 32750 Keller Road, approximately 986 feet east of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R8 is placed at the building façade.
- Location R9: Location R9 represents the existing school. MESI Ranch Academy, at 33303 Louise Road, approximately 4,317 feet northwest of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R9 is placed at the building façade.

The SCAQMD recommends that the nearest sensitive receptor be considered when determining a Project's impact. The nearest land use where an individual could remain for 24 hours to the Project site has been used to determine localized construction and operational air quality impacts for emissions of $PM_{10}$ and $PM_{2.5}$ (since $PM_{10}$ and $PM_{2.5}$ thresholds are based on a 24-hour averaging time). As previously stated, and consistent with LST Methodology, the nearest industrial/commercial use to the Project site is used to determine construction and operational LST air impacts for emissions of $NO_X$ and CO as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assumed that an individual could be present at these sites for periods of one to 8 hours. (Urban Crossroads, 2026, p. 42)

### *5. Methodology for Evaluating Construction-Related Health Risks*

#### *Exposure Quantification*

The analysis herein has been conducted in accordance with the guidelines in the Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (SCAQMD, 2003b). The Environmental Protection Agency's (U.S. EPA's) AERMOD model has been utilized. For purposes of this analysis, the Lakes AERMOD View (Version 13.0.0) was used to calculate annual average particulate concentrations associated with site operations. Lakes AERMOD View was utilized to incorporate the U.S. EPA's latest AERMOD Version 24142. (Urban Crossroads, 2025a, p. 14)




Source(s): Urban Crossroads, 2026

Figure 4.3-1

Not to Scale

Sensitive Receptor Locations

The model offers additional flexibility by allowing the user to assign an initial release height and vertical dispersion parameters for mobile sources representative of a roadway. For the evaluation of Project construction-related health risks, the roadways were modeled as adjacent volume sources. Roadways were modeled using the U.S. EPA's haul route methodology for modeling construction haul truck and vendor truck movement. More specifically, the Haul Road Volume Source Calculator in Lakes AERMOD View has been utilized to determine the release height parameters. Based on the US EPA methodology, the Project's modeled sources would result in a release height of 3.49 meters and an initial lateral dimension of 4.0 meters, and an initial vertical dimension of 3.25 meters. (Urban Crossroads, 2025a, p. 14)

Model parameters are presented in Table 4.3-8, *AERMOD Model Parameters*. The model requires additional input parameters including emission data and local meteorology. Meteorological data from the SCAQMD's Perris Airport monitoring station was used to represent local weather conditions and prevailing winds. (Urban Crossroads, 2025a, p. 14)

**Table 4.3-8 AERMOD Model Parameters**

| | |
|---|---|
| Dispersion Coefficient (Urban/Rural) | Urban (population 2,189,641) |
| Terrain (Flat/Elevated) | Elevated (Regulatory Default) |
| Averaging Time | 1 year (5-year Meteorological Data Set) |
| Receptor Height | 0 meters (Regulatory Default) |

(Urban Crossroads, 2025a, Table 2-3)

Universal Transverse Mercator (UTM) coordinates for World Geodetic System (WGS) 84 were used to locate the Project site boundaries, each volume source location, and receptor locations in the Project vicinity. The AERMOD dispersion model summary output files for the Project are presented in Appendix 2.2. Modeled sensitive receptors were placed at residential and nonresidential locations. (Urban Crossroads, 2025a, p. 14)

Receptors may be placed at applicable structure locations for residential property and not necessarily the boundaries of the properties containing these uses because the human receptors spend a majority of their time at the residence's building, and not on the property line. It should be noted that the primary purpose of receptor placement is focused on long-term exposure. For example, the construction-related health risk analysis evaluates the potential health risks to residents, workers and school children over a period of 30, 25, or 9 years of exposure, respectively. Notwithstanding, as a conservative measure, receptors were placed at either the outdoor living area or the building façade, whichever is closer to the Project site. (Urban Crossroads, 2025a, p. 14)

For purposes of evaluating construction-related health risks, receptors include both residential, non-residential (worker) and school land uses in the vicinity of the Project. These receptors are included in the HRA since residents and workers may be exposed at these locations over a long-term duration of 30, 25 and 9 years respectively. This methodology is consistent with SCAQMD and Office of Environmental Health Hazard Assessment (OEHHA) recommended guidance. (Urban Crossroads, 2025a, pp. 14-15)

Any impacts to residents, workers or school children located further away from the Project site than the modeled residents or workers would have a lesser impact than what has already been disclosed in the Project's HRA at the Maximally Exposed Individual Receptor (MEIR), Maximally Exposed Individual Worker (MEIW), and Maximally Exposed Individual School Child (MEISC) because concentrations dissipate with distance. (Urban Crossroads, 2025a, p. 15)

All receptors were set to existing elevation height so that only ground-level concentrations are analyzed. United States Geological Survey (USGS) Digital Elevation Model (DEM) terrain data based on a 7.5-minute topographic quadrangle map series using AERMAP was utilized in the HRA modeling to set elevations. (Urban Crossroads, 2025a, p. 15)

Discrete variants for daily breathing rates, exposure frequency, and exposure duration were obtained from relevant distribution profiles presented in the 2015 OEHHA Guidelines. Tables 2-4 through 2-6 of the Project's HRA (*Technical Appendix B2*) summarize the Exposure Parameters for residents, workers, and school children based on 2015 OEHHA Guidelines. Appendix 2.3 to the Project's HRA includes the detailed risk calculation. (Urban Crossroads, 2025a, p. 15)

***Carcinogenic Chemical Risk***

Excess cancer risks are estimated as the upper-bound incremental probability that an individual will develop cancer over a lifetime as a direct result of exposure to potential carcinogens over a specified exposure duration. The estimated risk is expressed as a unitless probability. The cancer risk attributed to a chemical is calculated by multiplying the chemical intake or dose at the human exchange boundaries (e.g., lungs) by the chemical-specific cancer potency factor (CPF). A risk level of 10 in one million implies a likelihood that up to 10 people, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. (Urban Crossroads, 2025a, p. 16)

Guidance from CARB and OEHHA recommends a refinement to the standard point estimate approach when alternate human body weights and breathing rates are utilized to assess risk for susceptible subpopulations such as children. For the inhalation pathway, the procedure requires the incorporation of several discrete variates to effectively quantify dose. Once determined, contaminant dose is multiplied by the cancer potency factor (CPF) in units of inverse dose expressed in milligrams per kilogram per day (mg/kg/day)-1 to derive the cancer risk estimate. Therefore, to assess exposures, the dose algorithm provided in Subsection 2.4 of the Project's HRA (*Technical Appendix B2*) was utilized. (Urban Crossroads, 2025a, p. 16)

***Non-Carcinogenic Exposures***

An evaluation of the potential noncarcinogenic effects of chronic exposures was also conducted. Adverse health effects are evaluated by comparing a compound's annual concentration with its toxicity factor or Reference Exposure Level (REL). The REL for diesel particulates was obtained from OEHHA for this analysis. The chronic reference exposure level (REL) for DPM was established by OEHHA as 5 $\mu g/m^3$. Non-cancer health effects are expressed as a hazard index (HI), which is calculated using the equation presented in Subsection 2.5 of the Project's HRA (*Technical Appendix B2*). (Urban Crossroads, 2025a, p. 16)

### 4.3.10 Impact Analysis

| **Threshold a.: Would the Project conflict with or obstruct implementation of the applicable air quality plan?** |
|---|

The Project site is located within the SCAB, which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743 square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the SCAG, county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet State and federal ambient air quality standards. (Urban Crossroads, 2026, p. 46)

Currently, these State and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. (Urban Crossroads, 2026, p. 46)

In December 2022, the SCAQMD released the Final 2022 AQMP (2022 AQMP). The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the CAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements[2]. The Project's consistency with the AQMP will be determined using the 2022 AQMP as discussed below. (Urban Crossroads, 2026, p. 46)

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993). These indicators are discussed below. (Urban Crossroads, 2026, p. 47)

- ***Consistency Criterion No. 1****: The proposed Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

[2] Although SCAG has since adopted the 2024-2050 version of the RTP/SCS, the 2022 SCAQMD AQMP based its assumptions, in part, on the 2020-2045 version of the RTP/SCS.

The violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if Regional or localized significance thresholds were exceeded. (Urban Crossroads, 2026, p. 47)

***Construction Impacts – Consistency Criterion 1***

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if LSTs or regional significance thresholds were exceeded. As indicated under the discussion of Thresholds b) and c), although the Project's localized emissions during construction would be less than significant, the Project's construction-related Regional emissions would result in emissions of $NO_X$ that would exceed the SCAQMD's threshold of significance. Accordingly, prior to mitigation, the Project's near-term construction-related Regional emissions of $NO_X$ would conflict with the AQMP with respect to this criterion. (Urban Crossroads, 2026, p. 47)

***Operational Impacts – Consistency Criterion 1***

As indicated under the analysis of Thresholds b. and c., long-term operation of the proposed Project would not exceed any of the SCAQMD LSTs or Regional thresholds of significance. Accordingly, the proposed Project would be consistent with the AQMP for long-term operational activities, and impacts would be less than significant. (Urban Crossroads, 2026, p. 47)

On the basis of the preceding discussion, because the Project's construction emissions would exceed the SCAQMD Regional Thresholds for $NO_X$, the Project has the potential to conflict with the AQMP. This is evaluated as a potentially significant impact for which mitigation would be required. (Urban Crossroads, 2026, p. 47)

- ***Consistency Criterion No. 2:*** *The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.*

The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in County of Riverside General Plan is considered to be consistent with the AQMP. (Urban Crossroads, 2026, p. 47)

***Construction Impacts – Consistency Criterion 2***

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. However, as noted under the discussion and analysis of Threshold b), near-term construction activities associated with the Project would result in emissions of $NO_X$ that would exceed the SCAQMD Regional threshold for this pollutant. Accordingly, prior to

mitigation, the Project's near-term construction-related Regional emissions of $NO_X$ would conflict with the AQMP with respect to this criterion. (Urban Crossroads, 2026, pp. 47-48)

***Operational Impacts – Consistency Criterion 2***

The County of Riverside General Plan designates the Project site Specific Plan (SP). The adopted Keller Crossing Specific Plan No. 380 (SP 380) designates the property for future development with 3 "Very Low Density Residential (VLDR)" dwelling units on 9.9 acres; 25 "Low Density Residential (LDR)" dwelling units on 18.3 acres; 42 "Medium Density Residential (MDR)" dwelling units on 13.9 acres; 39.5 acres of "Mixed Use," including 250 dwelling units and 250,000 square feet (s.f.) building area; 400,000 s.f. of "Commercial Retail (CR)" uses on 37.8 acres; 61.1 acres of "Open Space-Conservation (OS-C)" uses; and 20.6 acres of major circulation facilities. The proposed Project includes an application for Amendment No. 1 to SP 380, which would redesignate the approximately 196.1-acre Project site for future development with up to 694 residential dwelling units, including 77 "Medium-Density Residential (MDR)" units on 16.03 acres, 307 "Medium-High-Density Residential (MHDR)" units on 44.63 acres, and 310 "High-Density Residential (HDR)" units, 80 of which are designated as age-restricted, on 26.71 acres. The Project would also include approximately 8.88 acres of "Open Space–Recreation" (OS-R), 16.00 acres of "Open Space–Water" (OS-W), 61.42 acres of "Open Space–Conservation Habitat" (OS-CH), 3.49 acres of "Open Space–Conservation" (OS-C), and 18.89 acres of major circulation facilities. While the Project would require a General Plan Amendment, the purpose of the amendment is to allow a reconfiguration of the land use plan to more appropriately locate uses and actually results in a slight reduction in land use intensity and fewer vehicular trips and thus less VMT. Specifically, and as shown in Table 4.3-9, *Approved SP 380 and Proposed Project Trip Generation* Comparison, as compared to the approved SP 380, the proposed Project would result in a net reduction in daily vehicular trips by approximately 14,349 trips per day. As the majority of the Project's air quality emissions are associated with vehicular traffic, and because the Project would result in a substantial reduction in traffic as compared to the approved land uses for the site, it can be concluded that the land uses proposed as part of the Project are consistent with the County of Riverside growth projections. On the basis of the preceding discussion, the Project's long-term emissions are determined to be consistent with the second criterion. (Urban Crossroads, 2026, p. 48)

**Table 4.3-9 Approved SP 380 and Proposed Project Trip Generation Comparison**

| | AM Peak Hour | | | PM Peak Hour | | | Daily |
|---|---|---|---|---|---|---|---|
| | In | Out | Total | In | Out | Total | |
| Proposed Project | 107 | 291 | 398 | 334 | 204 | 538 | 5,968 |
| Approved Specific Plan | 664 | 257 | 921 | 896 | 1,193 | 2,089 | 20,317 |
| **Variance (Proposed - Approved)** | **-557** | **34** | **-523** | **-562** | **-989** | **-1,551** | **-14,349** |

(Urban Crossroads, 2025g, Table 4)

***AQMP Consistency Conclusion***

Based on the preceding analysis, the Project's long-term operational air quality emissions would be consistent with the AQMP based on the Project's less-than-significant operational air quality impacts and due to the substantial reduction in the amount of traffic and traffic-related air quality emissions that would

be generated as compared to the approved SP 380 land uses. However, although the Project's localized construction emissions would not exceed any of the SCAQMD LSTs, the Project's near-term emissions of $NO_X$ during construction activities would exceed the SCAQMD Regional threshold for this pollutant. Accordingly, prior to mitigation, the proposed Project would have the potential to conflict with the AQMP. This is evaluated as a potentially significant impact for which mitigation would be required.

| | |
|---|---|
| **Threshold b:** | **Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?** |

The Project has the potential to result in a cumulatively-considerable net increase of criteria pollutants for which the Project region is non-attainment during both construction and long-term operations, both of which are discussed below.

❑ **Construction Emissions (Regional Thresholds)**

Construction activities associated with the Project would result in emissions of VOCs, $NO_x$, $SO_x$, CO, $PM_{10}$, and $PM_{2.5}$. As described in Section 3.4.1 of the Project's AQIA (*Technical Appendix B1*), emissions would result from various construction activities including grading, utility installations, street improvements, building construction, paving, and architectural coating. Construction is planned in multiple phases, including both on-site and off-site improvements. Fugitive dust emissions, which are typically a concern during grading, were modeled using CalEEMod based on Project-specific parameters, including soil conditions, equipment usage, and the extent of ground disturbance. No import or export of soil is anticipated during grading, as the site is expected to balance cut and fill volumes (Urban Crossroads, 2026, pp. 30-34)

As shown in Table 4.3-10, *Overall Construction Emissions Summary – Without Mitigation*, the estimated maximum daily unmitigated construction emissions would exceed the SCAQMD regional threshold for $NO_x$, but would remain below thresholds for VOC, CO, $SO_x$, $PM_{10}$, and $PM_{2.5}$. As such, the Project's near-term regional construction-related emissions would result in a cumulatively-considerable net increase of a criteria pollutant ($NO_X$) for which the Project region is non-attainment (i.e., $O_3$) under an applicable federal or State ambient air quality standard, and impacts would be potentially significant prior to mitigation. (Urban Crossroads, 2026, pp. 34-35)

❑ **Operational Emissions (Regional Thresholds)**

Operational activities associated with the Project would result in emissions of VOCs, $NO_x$, $SO_x$, CO, $PM_{10}$, and $PM_{2.5}$. Operational emissions would be generated from area sources (e.g., architectural coatings, consumer products, landscape equipment), energy use (e.g., natural gas consumption), and mobile sources (e.g., vehicular traffic associated with residential uses). As described in Section 3.5 of the Project's AQIA (*Technical Appendix B1*), emissions were modeled using CalEEMod Version 2022, incorporating trip data from the Project's Traffic Analysis (*Technical Appendix L2*) and land uses proposed as part of the Project. (Urban Crossroads, 2026, pp. 36-37)

**Table 4.3-10 Overall Construction Emissions Summary – Without Mitigation**

| Year | Emissions (lbs/day) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| **Summer** | | | | | | |
| 2026 | 13.11 | 109.53 | 121.64 | 0.25 | 19.15 | 9.64 |
| 2027 | 4.32 | 27.80 | 61.76 | 0.08 | 6.43 | 2.16 |
| 2028 | 43.80 | 30.37 | 65.08 | 0.08 | 6.80 | 2.28 |
| 2029 | 46.40 | 18.92 | 42.37 | 0.05 | 4.70 | 1.51 |
| **Winter** | | | | | | |
| 2025 | 3.94 | 36.56 | 30.84 | 0.08 | 4.45 | 2.38 |
| 2026 | 16.40 | 140.83 | 142.03 | 0.33 | 23.29 | 11.78 |
| 2027 | 13.11 | 108.25 | 116.57 | 0.27 | 19.05 | 9.57 |
| 2028 | 43.71 | 30.65 | 59.01 | 0.08 | 6.80 | 2.28 |
| 2029 | 46.22 | 19.10 | 38.26 | 0.05 | 4.70 | 1.51 |
| 2030 | 46.12 | 18.53 | 37.49 | 0.05 | 4.66 | 1.48 |
| **Maximum Daily Emissions** | **46.40** | **140.83** | **142.03** | **0.33** | **23.29** | **11.78** |
| SCAQMD Regional Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| **Threshold Exceeded?** | **NO** | **YES** | **NO** | **NO** | **NO** | **NO** |

(Urban Crossroads, 2026, Table 3-5)

Operational emissions for both summer and winter scenarios are summarized in Table 4.3-11, *Summary of Peak Operational Emissions*. As shown, the Project's maximum daily emissions during long-term operations would not exceed SCAQMD regional thresholds for any criteria pollutant, including VOCs. Detailed model outputs are provided in Appendices 3.9 and 3.10 of the Project's AQIA (*Technical Appendix B1*). Therefore, operational emissions would not result in a cumulatively considerable net increase of any criteria pollutant for which the SCAB is in non-attainment under State or federal standards, and operational air quality impacts would be less than significant requiring no mitigation. (Urban Crossroads, 2026, p. 37)

❑ **Potential Overlap of Construction and Operational Activity**

Based on the assumed construction and buildout schedule of the proposed Project, there is potential for overlap between construction and operational activity. However, the SCAQMD has not developed or published a combined construction and operational emission significance threshold. Combining the construction emissions with the operational emissions would present a maximum daily emission representing peak building construction activity and half of the Project site operational activity, a scenario that may not occur. (Urban Crossroads, 2025a, p. 39)

As such, construction and operational emissions have been totaled to show the theoretical overlap of the construction and operational activities. It should be noted that because the SCAQMD does not have different thresholds for overlapping activities, the potential emissions from overlapping construction and operational activity shown in Table 4.3-12, *Potential Overlap of Construction and Operation Activity*, is provided for informational purposes only. Notwithstanding, Table 4.3-12 shows that if the Project's combined construction and operational emissions were to be compared against the SCAQMD regional threshold for construction activities, the Project's combined construction and operational emissions would

## Table 4.3-11 Summary of Peak Operational Emissions

| Phase | Source | Emissions (lbs/day) | | | | | |
|---|---|---|---|---|---|---|---|
| | | VOC | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| 1 | **Summer** | | | | | | |
| | Mobile Source | 8.66 | 7.46 | 71.17 | 0.19 | 17.00 | 4.40 |
| | Area Source | 12.34 | 4.76 | 17.76 | 0.03 | 0.38 | 0.38 |
| | Energy Source | 0.12 | 2.04 | 0.87 | 0.01 | 0.16 | 0.16 |
| | **Total Maximum Daily Emissions** | **21.12** | **14.25** | **89.80** | **0.23** | **17.55** | **4.95** |
| | SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| | **Threshold Exceeded?** | **NO** | **NO** | **NO** | **NO** | **NO** | **NO** |
| | **Winter** | | | | | | |
| | Mobile Source | 8.13 | 7.99 | 60.11 | 0.18 | 17.00 | 4.40 |
| | Area Source | 10.96 | 4.61 | 1.96 | 0.03 | 0.37 | 0.37 |
| | Energy Source | 0.12 | 2.04 | 0.87 | 0.01 | 0.16 | 0.16 |
| | **Total Maximum Daily Emissions** | **19.21** | **14.63** | **62.94** | **0.22** | **17.54** | **4.94** |
| | SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| | **Threshold Exceeded?** | **NO** | **NO** | **NO** | **NO** | **NO** | **NO** |
| Project Buildout | **Summer** | | | | | | |
| | Mobile Source | 19.92 | 17.52 | 175.14 | 0.48 | 45.86 | 11.85 |
| | Area Source | 29.66 | 11.88 | 44.41 | 0.08 | 0.95 | 0.94 |
| | Energy Source | 0.28 | 4.78 | 2.03 | 0.03 | 0.39 | 0.39 |
| | **Total Maximum Daily Emissions** | **49.85** | **34.18** | **221.58** | **0.59** | **47.20** | **13.18** |
| | SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| | **Threshold Exceeded?** | **NO** | **NO** | **NO** | **NO** | **NO** | **NO** |
| | **Winter** | | | | | | |
| | Mobile Source | 18.80 | 18.77 | 147.25 | 0.45 | 45.86 | 11.85 |
| | Area Source | 26.25 | 11.51 | 4.90 | 0.07 | 0.93 | 0.93 |
| | Energy Source | 0.28 | 4.78 | 2.03 | 0.03 | 0.39 | 0.39 |
| | **Total Maximum Daily Emissions** | **45.33** | **35.06** | **154.19** | **0.56** | **47.18** | **13.17** |
| | SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| | **Threshold Exceeded?** | **NO** | **NO** | **NO** | **NO** | **NO** | **NO** |

(Urban Crossroads, 2026, Table 3-7)

## Table 4.3-12 Potential Overlap of Construction and Operation Activity

| Emissions | Emissions (lbs/day) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| Summer | | | | | | |
| Construction (Phase 2) | 46.17 | 18.55 | 44.23 | 0.05 | 4.60 | 1.42 |
| Operations (Phase 1) | 21.12 | 14.25 | 89.80 | 0.23 | 17.55 | 4.95 |
| **Total Maximum Daily Emissions** | **67.28** | **32.81** | **134.03** | **0.28** | **22.15** | **6.37** |
| Winter | | | | | | |
| Construction (Phase 2) | 45.99 | 18.74 | 40.13 | 0.05 | 4.60 | 1.42 |
| Operations (Phase 1) | 19.21 | 14.63 | 62.94 | 0.22 | 17.54 | 4.94 |
| **Total Maximum Daily Emissions** | **65.21** | **33.37** | **103.07** | **0.27** | **22.14** | **6.37** |
| **SCAQMD Construction Regional Threshold** | **75** | **100** | **550** | **150** | **150** | **55** |
| **SCAQMD Operational Regional Threshold** | **55** | **55** | **550** | **150** | **150** | **55** |

Source: CalEEMod localized operational-source emissions are presented in Appendices 3.5 through 3.10 of the Projects AQIA (*Technical Appendix B1*).
(Urban Crossroads, 2026, Table 3-8)

not exceed any of the SCAQMD regional thresholds of significance. However, if compared against the SCAQMD regional threshold for operational activities, the Project's combined construction and operational emissions would exceed the SCAQMD regional threshold for VOCs, but would be below the regional thresholds for all other criteria pollutants. However, given that the SCAQMD has not published thresholds of significance for combined construction and operational emissions, no significant impact is identified beyond the Project's significant impact due to construction-related emissions, as identified above. (Urban Crossroads, 2025a, p. 39)

**Threshold c.: Would the Project expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?**

The Project has the potential to expose nearby sensitive receptors to substantial pollutant concentrations during both construction and long-term operational activities. The following provides an analysis based on the applicable LSTs established by the State of California and SCAQMD, an analysis of the Project's potential to result in or contribute to CO "hot spots," and an analysis of potential Project impacts due to toxic air contaminants (TACs).

***Localized Significance Thresholds (LSTs)***

❑ **Construction-Source Emissions LST Analysis**

In order to account for a conservative condition, the peak day construction emissions were modeled based on a review of all construction subphases (e.g., site preparation, grading, building construction, paving, coatings). Additionally, based on the SCAQMD LST Methodology, the background concentrations for CO and $NO_2$ are to be added to the model concentrations. However, because the SCAB exceeds the federal or State $PM_{10}$ and $PM_{2.5}$ standards, background concentrations for these pollutants are not considered. (Urban Crossroads, 2026, p. 44)

Table 4.3-13, *Localized Significance Summary Peak Construction – Without Mitigation*, presents the modeled construction emissions and compares them to the SCAQMD's construction-related LSTs. As shown, the Project's construction-related emissions at the nearest receptor would not exceed any of the applicable LSTs, even without mitigation. All other modeled locations in the study area would experience a lesser concentration and consequently would have a lesser impact. Therefore, the Project's localized construction emissions would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. (Urban Crossroads, 2026, p. 44)

❑ **Operational-Source Localized Emissions**

As discussed in Section 3.8 of the AQIA, according to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed Project does not include such uses, as the Project only would accommodate residential, recreational, and open space land uses. Thus, due to the lack of significant stationary source emissions, no

**Table 4.3-13 Localized Significance Summary Peak Construction – Without Mitigation**

| Peak Construction | CO | | $NO_2$ | $PM_{10}$ | $PM_{2.5}$ |
|---|---|---|---|---|---|
| | Averaging Time | | | | |
| | 1-Hour | 8-Hour | 1-Hour | 24-Hours | 24-Hours |
| Peak Day Localized Emissions | 0.02 | 0.01 | 1.37E-02 | 0.65 | 0.34 |
| Background Concentration [A] | 1.3 | 0.7 | 0.042 | | |
| **Total Concentration** | **1.32** | **0.71** | **0.06** | **0.65** | **0.34** |
| SCAQMD Localized Significance Threshold | 20 | 9 | 0.18 | 10.4 | 10.4 |
| **Threshold Exceeded?** | **NO** | **NO** | **NO** | **NO** | **NO** |

[A] Highest concentration from the last three years of available data. Per SCAQMD LST guidance, PM10 and PM2.5 background concentrations are not considered.
Notes: $PM_{10}$ and $PM_{2.5}$ concentrations are expressed in $\mu g/m^3$. All others are expressed in ppm. Threshold based on SCAQMD guidance: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25
(Urban Crossroads, 2026, Table 3-9)

long-term localized significance threshold analysis is needed. Therefore, operational activities would not expose sensitive receptors to substantial pollutant concentrations, and localized operational air quality impacts would be less than significant. (Urban Crossroads, 2026, p. 45)

❑ **CO "Hot Spot" Analysis**

A CO hotspot is defined as a localized concentration of carbon monoxide exceeding the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. At the time the most recent CEQA Air Quality Handbook (1993) was published by SCAQMD, the air basin was designated as non-attainment for CO, requiring projects to perform hotspot analyses to ensure they did not worsen the existing conditions. Over the last two decades, background CO concentrations have been reduced significantly due to regulatory controls on tailpipe emissions, which have culminated in the air basin achieving attainment status for CO. (Urban Crossroads, 2026, p. 45)

The 2003 AQMP's findings underscore that CO hotspots are highly unlikely due to the reduced background concentrations and the effectiveness of California's air quality management strategies. The substantial reduction in CO levels from the vehicle fleet and the state's attainment status for CO further diminish the need for detailed microscale hotspot analyses, reinforcing that existing monitoring and regulatory frameworks adequately address potential air quality concerns. (Urban Crossroads, 2026, pp. 45-46)

In 2003, the SCAQMD as part of its AQMP development process, prepared modeling to determine the potential for CO Hotspots at the four busiest intersections in the air basin. As summarized in the 2003 AQMP, even at one of the busiest intersections at that time, only 0.7 ppm of CO is attributable to vehicular traffic and the remaining 7.7 ppm were due to ambient background conditions. As shown on Table 2-5 of the Project's AQIA (*Technical Appendix B1*), the background 1-hour and 8-hour concentrations are well below the applicable AAQS. The 2003 AQMP's findings underscore that CO hotspots are highly unlikely due to the reduced background concentrations and the effectiveness of California's air quality management strategies. The substantial reduction in CO levels from the vehicle fleet and the state's attainment status for

CO further diminish the need for detailed microscale hotspot analyses, reinforcing that existing monitoring and regulatory frameworks adequately address potential air quality concerns. (Urban Crossroads, 2026, p. 46)

As such, Project-related traffic at any intersections within the Project area would not cause or contribute to a CO hotspot since the background concentrations are low and any contribution from Project traffic would be negligible. As such, Project impacts due to CO hotspots would be less than significant. (Urban Crossroads, 2026, p. 46)

❑ **Toxic Air Contaminants (TACs)**

***Construction Activities***

In order to evaluate whether the proposed Project would result in significant impacts due to localized air quality emissions during Project construction, a Project-specific Health Risk Analysis (HRA) was prepared for the Project and is included as EIR *Technical Appendix B2*. Refer to Section 2 of the HRA for a detailed discussion of modeling inputs and methodology used to evaluate the Project's near-term construction-related emissions. As noted therein, the analysis is based in part on the emission calculations prepared as part of the Project's AQIA (*Technical Appendix B1*). In addition, for purposes of analysis it was conservatively assumed that Project-related construction activities would include off-site roadway improvements and utility construction that would include the installation of approximately 23,760 linear feet (4.50 miles) of utility infrastructure and over 35.2 acres of off-site ground disturbance during construction. (Urban Crossroads, 2025a, p. 10)

Provided below is an assessment of the Project's potential Diesel Particulate Matter (DPM)-source cancer and non-cancer health risks at the Maximally Exposed Individual Receptor (MEIR), Maximally Exposed Individual Worker (MEIW), and the Maximally Exposed Individual School Child (MEISC).

Residential Exposure Scenario

The land use with the greatest potential exposure to Project construction-source DPM emissions is Location R7 which is located approximately 209 feet south of the Project site at an existing residence located at 34044 Winchester Road (refer to Figure 4.3-1). Since there are no private outdoor living areas (backyards) facing the Project site, Receptor R7 was placed at the residential building façade. Without mitigation, the maximum incremental cancer risk attributable to Project construction-source DPM emissions affecting the MEIR is estimated at 5.79 in one million, which is less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be less than ≤0.01, which would not exceed the applicable threshold of 1.0. Although Location R5 is not the nearest residential receptor to the Project site, it would experience the highest concentrations of DPM during Project construction due to meteorological conditions at the site. As such, based on the previous discussion n, a less-than-significant impact is expected for cancer and non-cancer risk and no mitigation is required. Because all other modeled receptors would experience lower concentrations of DPM during Project construction, all other receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk

than what is identified for this location. Accordingly, Project impacts to the MEIR due to cancer and non-cancer health risks would be less than significant requiring no mitigation. (Urban Crossroads, 2025a, pp. 17-18)

Worker Exposure Scenario[3]

The worker receptor land use with the greatest potential exposure to Project construction-source DPM emissions is Location R8, which represents the potential worker receptor, Bill and Dave's Landscape located at 32750 Keller Road approximately 986 east of the Project site (refer to Figure 4.3-1). Location R8 is the worker receptor that would experience the highest concentrations of DPM during Project construction due to meteorological conditions at the site. Without mitigation, at the MEIW, the maximum incremental cancer risk impact would be 0.05 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location would be ≤0.01, which would not exceed the applicable significance threshold of 1.0.All other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. Accordingly, Project impacts to the MEIW due to cancer and non-cancer health risks would be less than significant requiring no mitigation. (Urban Crossroads, 2025a, pp. 18-19)

School Child Exposure Scenario

Proximity to sources of toxics is critical to determining whether an impact is likely to occur. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70-percent drop-off in particulate pollution levels at 500 feet. Based on CARB and SCAQMD emissions and modeling analyses, an 80-percent drop-off in pollutant concentrations is expected at approximately 1,000 feet from a source. The 1,000-foot evaluation distance is supported by research-based findings concerning TAC emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources. A one-quarter mile radius, or 1,320 feet, is commonly utilized for identifying sensitive receptors, such as schools, that may be impacted by a proposed project. This radius is more robust than, and therefore provides a more health protective scenario for evaluation than, the 1,000-foot impact radius identified above. Notwithstanding, for full disclosure purposes, the nearest school was also evaluated. (Urban Crossroads, 2025a, p. 19)

The nearest school and location of the MEISC is MESI Ranch Academy located at 33303 Louise Road, approximately 4,317 feet northwest of the Project site and represented by Receptor R9 (refer to Figure 4.3-1. At the MEISC, the maximum incremental cancer risk impact attributable to the Project is calculated to be 0.03 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Project were calculated to be ≤0.01, which would not exceed the

[3] SCAQMD guidance does not require assessment of the potential health risk to on-site workers. Excerpts from the document OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines—The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA 2003), also indicate that it is not necessary to examine the health effects to on-site workers unless required by RCRA (Resource Conservation and Recovery Act) / CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) or the worker resides on-site.

applicable significance threshold of 1.0. As such, based on the previous discussion, a less-than-significant impact is expected for cancer and non-cancer risk and no mitigation is required.

***Operational Activities***

TACs analysis apply to the operational phase of a proposed project, if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed Project does not include such uses, and thus, due to the lack of significant stationary source emissions, no TAC analysis is needed for operations.

❑ **Community Health**

Most local agencies, including the County of Riverside, lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally-specific thresholds of significance based on potential health impacts from an individual development project. The use of national or "generic" data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in causing asthma), existing scientific tools cannot accurately estimate health impacts of the Project's air emissions without undue speculation. Instead, readers are directed to the above analysis of the Project's air quality impacts, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project's construction and long-term operation. (Urban Crossroads, 2026, p. 49)

Notwithstanding, the Project's AQIA does evaluate the proposed Project's localized impact to air quality for emissions of CO, $NO_X$, $PM_{10}$, and $PM_{2.5}$ by comparing the proposed Project's on-site emissions to the SCAQMD's applicable LST thresholds. The LST analysis above determined that the Project would not result in emissions exceeding SCAQMD's LSTs during construction or long-term operation. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or State ambient air quality standards for emissions of CO, $NO_X$, $PM_{10}$, and $PM_{2.5}$. (Urban Crossroads, 2026, p. 49)

As the Project's emissions would comply with federal, State, and local air quality standards, the proposed Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level and would not provide a reliable indicator of health effects if modeled. (Urban Crossroads, 2026, p. 49)

**Threshold d: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

Land uses generally associated with odor complaints include: agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The Project does not include any land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project

may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors and other emissions (such as those leading to odors) associated with construction and operations activities of the proposed Project would be less than significant and no mitigation is required. (Urban Crossroads, 2026, pp. 49-50)

### 4.3.11 Cumulative Impact Analysis

With exception of the issue of odors, the cumulative study area for air quality includes Riverside County and the SCAB. The SCAB is designated as a nonattainment area for State standards of $O_3$, $PM_{10}$, and $PM_{2.5}$. The region also is designated as a nonattainment area for federal standards of $O_3$ and $PM_{2.5}$. Cumulative growth in population, vehicle use, and industrial activity could inhibit efforts to improve regional air quality and attain the ambient air quality standards. Thus, with exception of odors, the setting for this cumulative analysis consists of the SCAB and associated growth and development anticipated in the air basin. For the issue of odors, the cumulative study area includes the Project site and lands in close proximity to the Project site, as odors diminish rapidly with distance from the source.

As discussed under the analysis of Threshold a., Project construction-related emissions of $NO_X$ would exceed the SCAQMD Regional threshold for this pollutant. As such, prior to mitigation, the proposed Project would not be consistent with the SCAQMD AQMP. As other cumulative developments within the SCAB region also have the potential to conflict with the SCAQMD AQMP, the Project's impacts due to a potential conflict with the AQMP would be cumulatively considerable.

As previously shown in Table 4.3-4, the CAAQS designate the Project area as nonattainment for $O_3$, $PM_{10}$, and $PM_{2.5}$ while the NAAQS designates the Project area as nonattainment for $O_3$ and $PM_{2.5}$. The AQMD has published a report on how to address cumulative impacts from air pollution: White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. In this report the AQMD clearly states (Page D-3): (Urban Crossroads, 2026, p. 50)

> "*...the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both*

> *of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts*. (Urban Crossroads, 2026, p. 50)
>
> *Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant." Therefore, individual projects that do not exceed SCAQMD daily regional significance thresholds for criteria pollutants are generally assumed to have a less than cumulatively considerable impact on regional air quality*. (Urban Crossroads, 2026, p. 50)

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions exceeding the SCAQMD's thresholds also would not cause a cumulatively-considerable increase in emissions for those pollutants for which SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual Project-related construction and operational emissions that exceed SCAQMD thresholds would be considered cumulatively considerable. (Urban Crossroads, 2026, pp. 50-51)

The Project-specific evaluation of emissions presented in the Project's AQIA (*Technical Appendix B1*) and summarized herein under the analysis of Threshold b) determined that the Project's near-term construction activities would exceed the SCAQMD Regional threshold for $NO_X$. Therefore, prior to mitigation, the Project's emissions of $NO_X$ would exceed the SCAQMD regional threshold for this pollutant. Thus, prior to mitigation, Project-related construction activities would result in a cumulatively-considerable impact due to a net increase of any criteria pollutant ($NO_X$) for which the Project region is non-attainment ($O_3$) under an applicable federal or State ambient air quality standard, and impacts would be significant requiring mitigation.

The Project-specific evaluation of emissions presented in the Project's AQIA (*Technical Appendix B1*) and summarized herein under the analysis of Threshold b) determined that the Project's long-term operational emissions would not exceed any of the SCAQMD Regional Thresholds. Therefore, Project regional operational-source emissions would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, and impacts would be less than significant on a cumulatively-considerable basis.

As indicated under the analysis of Threshold c), the Project's near-term construction and long-term operational emissions would not exceed any of the SCAQMD LSTs. In addition, the Project has no potential to cause or contribute to any CO hotspots. In addition, Project-related construction emissions would not expose any nearby sensitive receptors, including the MEIR, MEIW, and MEISC, to cancer and non-cancer health risks exceeding the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively. Therefore, the Project would not expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations, and cumulatively-considerable impacts would be less than significant.

With respect to odors, and as discussed under the analysis of Threshold d., the proposed Project would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances (including odors) during both construction and long-term operation, and would be subject to Riverside County's solid waste regulations. The Project also would be required to comply with CCR, Title 13, Sections 2449(d)(3) and 2485, which minimize the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. The Project also would also comply with the SCAQMD (Southern Coast Air Quality Management District) Regulation XI, Rule 1113 – Architectural Coating, which would minimize odor impacts from VOC emissions during architectural coating. Other developments within the cumulative study area similarly would be required to comply with SCAQMD Rule 402, CCR, Title 13, Sections 2449(d)(3) and 2485, SCAQMD Rule 1113, and the solid waste regulations of the applicable jurisdictions. Therefore, Project impacts due to other emissions (such as those leading to odors) would be less-than-cumulatively considerable.

### 4.3.12 Significance of Impacts Before Mitigation

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The proposed Project would be consistent with the regional growth forecasts used to inform the SCAQMD 2022 AQMP, the Project's long-term operational emissions would not exceed the assumptions made by the SCAQMD the AQMP, and the Project's near-term construction activities would not exceed any of the SCAQMD LSTs. However, the Project's construction-related activities would result in emissions of $NO_X$ that would exceed the applicable SCAQMD Regional threshold for this pollutant. As such, prior to mitigation, the Project has the potential to conflict with the AQMP. This is evaluated as a significant direct and cumulatively-considerable impact of the proposed Project for which mitigation would be required.

Threshold b.: Significant Direct and Cumulatively-Considerable Impact. As indicated in Table 4.3-11, the Project's long-term operational emissions would not exceed any of the SCAQMD Regional thresholds of significance. However, and as noted in Table 4.3-10, near-term construction activities would exceed the SCAQMD Regional threshold for $NO_X$. As such, the Project would result in a cumulatively considerable net increase of a criteria pollutant ($NO_X$) for which the project region is non-attainment ($O_3$) under an applicable federal or State ambient air quality standard. The Project's operational emissions of $NO_X$ would represent a significant direct and cumulatively-considerable impact.

Threshold c.: Less-than-Significant Impact. As shown in Table 4.3-13, the Project's construction-related localized emissions of $NO_2$, CO, $PM_{10}$, and $PM_{2.5}$ would not exceed the applicable SCAQMD LSTs at the nearest sensitive receptors. A localized analysis for operational emissions was not required, as the Project does not include substantial stationary sources or long-term idling that would trigger LST evaluation under SCAQMD guidance. The Project would also not cause or contribute to a CO "hot spot," as anticipated traffic volumes would not approach levels identified in prior SCAQMD studies as having the potential to exceed CO ambient air quality standards. Additionally, the Project's Construction HRA demonstrates that the Project's near-term construction-related activities would not expose the MEIR, MEIW, or MEISC to cancer or non-cancer risks exceeding the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively.

Accordingly, the Project would not expose sensitive receptors that are located within one (1) mile of the Project site to substantial pollutant concentrations, and impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. The proposed Project does not include land uses typically associated with the generation of substantial or objectionable odors, such as wastewater treatment plants, landfills, or industrial facilities. During construction, temporary odors may be generated from diesel equipment and application of architectural coatings; however, these activities would be short-term and intermittent in nature. The Project would be required to comply with SCAQMD Rule 402 (Nuisance) and Rule 1113 (Architectural Coatings), which limit odor emissions and ensure best practices during construction. During operation, the Project would consist primarily of residential uses, which are not typically associated with odor impacts. Solid waste would be stored in covered containers and removed regularly in compliance with Riverside County solid waste regulations. Given the nature of the land uses and required compliance with applicable air quality and waste regulations, construction- and operation-related odor impacts would be less than significant, and no mitigation is required.

### 4.3.13 Regulations, Design Requirements, and Mitigation

***Applicable Regulations and Design Requirements***

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

- The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 1113, Architectural Coatings, by requiring that all architectural coatings must consist of low VOCs (i.e., VOCs of less than 50 grams per liter [g/L]) unless otherwise specified in the SCAQMD Table of Standards.

- The Project is required to comply with applicable SCAQMD rules for construction activities on the Project site. In addition to the SCAQMD requirements listed above, additional SCAQMD rules that are currently applicable during construction activity for this Project include Rule 431.2 (Low Sulfur Fuel) and Rule 1186/1186.1 (Street Sweepers).

- The Project is required to comply with the provisions of SCAQMD Rule 402, "Nuisance" which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public.

- In accordance with SCAQMD Rule 445, no wood burning devices shall be installed in any dwelling units.

- The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 403, "Fugitive Dust" by implementing the following dust control measures during construction activities, such as earth-moving activities, grading, and equipment travel on unpaved roads. Prior to

grading permit issuance, Riverside County shall verify that the following notes are included on the grading plan. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors.

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at an interval of 2.1 hours (i.e., 4 times per day) or a movable sprinkler system shall be in place to ensure minimum soil moisture of 12% is maintained for actively graded or disturbed areas. Moisture content shall be verified with use of a moisture probe by the grading contractor.
- All access points to the Project site shall have track-out devices installed.
- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 mph or less.

***Mitigation***

MM 4.3-1 During construction, all off-road diesel-powered equipment with a rated horsepower of 150 or greater shall meet EPA Tier 4 Final engine standards, where commercially available. Documentation demonstrating compliance with this requirement (e.g., equipment specification sheets, contracts, and/or certification from equipment suppliers) shall be submitted to the County of Riverside prior to the issuance of each applicable grading or building permit.

### 4.3.14 Significance of Impacts After Mitigation

Threshold a: Less Than Significant Impact with Mitigation Incorporated. As indicated in Table 4.3-14, *Overall Construction Emissions Summary (With Mitigation)*, implementation of Mitigation Measure MM 4.3-1 would reduce the Project's construction-related emissions of $NO_X$ to below the SCAQMD Regional threshold for this pollutant. Accordingly, with implementation of Mitigation Measure MM 4.3-1, the Project would be fully consistent with the SCAQMD 2022 AQMP, the Project's impacts due to a potential conflict with the AQMP would be reduced to below a level of significance.

Threshold b: Less Than Significant Impact with Mitigation Incorporated. As indicated in Table 4.3-14, implementation of Mitigation Measure MM 4.3-1 would reduce the Project's construction-related emissions of $NO_X$ to below the SCAQMD Regional threshold for this pollutant. Accordingly, with implementation of Mitigation Measure MM 4.3-1, the Project would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, and impacts would be reduced to below a level of significance.

**Table 4.3-14 Overall Construction Emissions Summary (With Mitigation)**

| Year | Emissions (lbs/day) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| Summer | | | | | | |
| 2026 | 4.91 | 72.01 | 152.98 | 0.25 | 15.54 | 6.35 |
| 2027 | 3.61 | 27.81 | 66.16 | 0.08 | 6.20 | 1.94 |
| 2028 | 43.36 | 29.20 | 68.73 | 0.08 | 6.59 | 2.09 |
| 2029 | 46.17 | 18.55 | 44.23 | 0.05 | 4.60 | 1.42 |
| Winter | | | | | | |
| 2025 | 1.07 | 21.95 | 44.73 | 0.08 | 3.16 | 1.21 |
| 2026 | 5.75 | 90.42 | 187.46 | 0.33 | 18.63 | 7.54 |
| 2027 | 4.99 | 73.78 | 152.41 | 0.27 | 15.59 | 6.42 |
| 2028 | 43.26 | 29.48 | 62.66 | 0.08 | 6.59 | 2.09 |
| 2029 | 45.99 | 18.74 | 40.13 | 0.05 | 4.60 | 1.42 |
| 2030 | 45.90 | 18.27 | 39.36 | 0.05 | 4.57 | 1.39 |
| **Maximum Daily Emissions** | **46.17** | **90.42** | **187.46** | **0.33** | **18.63** | **7.54** |
| SCAQMD Regional Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| **Threshold Exceeded?** | **NO** | **NO** | **NO** | **NO** | **NO** | **NO** |

Source: CalEEMod construction-source (mitigated) emissions are presented in Appendices 3.5 through 3.8 of the Project's AQIA (*Technical Appendix B1*).
(Urban Crossroads, 2026, Table 3-6)

## 4.3.15 References


| Cited As | Reference |
|---|---|
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| EPA, 2024 | United States Environmental Protection Agency, 2024. *1990 Clean Air Act Amendment Summary: Title I* (web site). November 12, 2024. Accessed June 18, 2025. Available on-line at: https://www.epa.gov/clean-air-act-overview/1990-clean-air-act-amendment-summary-title-i |
| SCAQMD, 2003b | South Coast Air Quality Management District, 2003b. *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. August 2003. Accessed June 18, 2025. Available on-line: |

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|---|---|
| | https://www.aqmd.gov/docs/default-source/ceqa/handbook/mobile-source-toxics-analysis.doc?sfvrsn=a86e1d61_2 |
| SCAQMD, 2008 | South Coast Air Quality Management District, 2008. *Final Localized Significance Threshold Methodology*. July 2008. Accessed June 18, 2025. Available on-line at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf |
| Urban Crossroads, 2026 | Urban Crossroads, Inc., 2026. *Keller Crossing Specific Plan Air Quality Impact Analysis County of Riverside*. January 27, 2026. Included as EIR *Technical Appendix B1*. |
| Urban Crossroads, 2025a | Urban Crossroads, Inc., 2025a. *Keller Crossing Specific Plan Construction Health Risk Assessment County of Riverside*. April 3, 2025. Included as EIR *Technical Appendix B2*. |
| Urban Crossroads, 2025f | Urban Crossroads, Inc., 2025f. *Keller Crossing TTM No. 38163 Traffic Analysis*. April 7, 2025. Included as EIR *Technical Appendix L2*. |
| Urban Crossroads, 2025g | Urban Crossroads, Inc., 2025g. *Keller Crossing TTM No. 38163 Trip Generation Assessment*. June 12, 2025. Included as EIR *Technical Appendix L3*. |

# 4.4 BIOLOGICAL RESOURCES

The analysis in this Subsection is based, in part, on information from several technical reports prepared by Glenn Lukos Associates, Inc. (herein, "GLA"). The first report is titled "Biological Technical Report for Keller Crossing Residential Development Project and Off Site Improvements" (herein, "BTR"), , is dated September 2025, and is included as *Technical Appendix C1* to this EIR (GLA, 2025). The Project's BTR represents an update to a previous biological technical report that was prepared in March 2022, and addresses the current Project's potential impacts associated with development as proposed, as well as potential impacts associated with off-site improvements, as described in EIR subsection 3.6.1. In addition, the information in this Subsection is based in part on the Project's, "Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis for Impacts to MSHCP Riparian/Riverine Areas, Keller Crossing Residential Development Project and Off Site Improvements," also prepared by GLA, dated June 2024, and included as *Technical Appendix C2* to this EIR (GLA, 2024). Additionally, a separate technical report was prepared by GLA to address the addition of a 0.13-acre off-site improvement area associated with Project drainage improvements. This report is titled, "Biological Technical Report Addendum for Keller Crossing Residential Development Project and Offsite Improvements," is dated March 19, 2026, and is included as EIR *Technical Appendix C3* (GLA, 2026). Refer to EIR Section 7.0, *References*, for a complete list of reference sources.

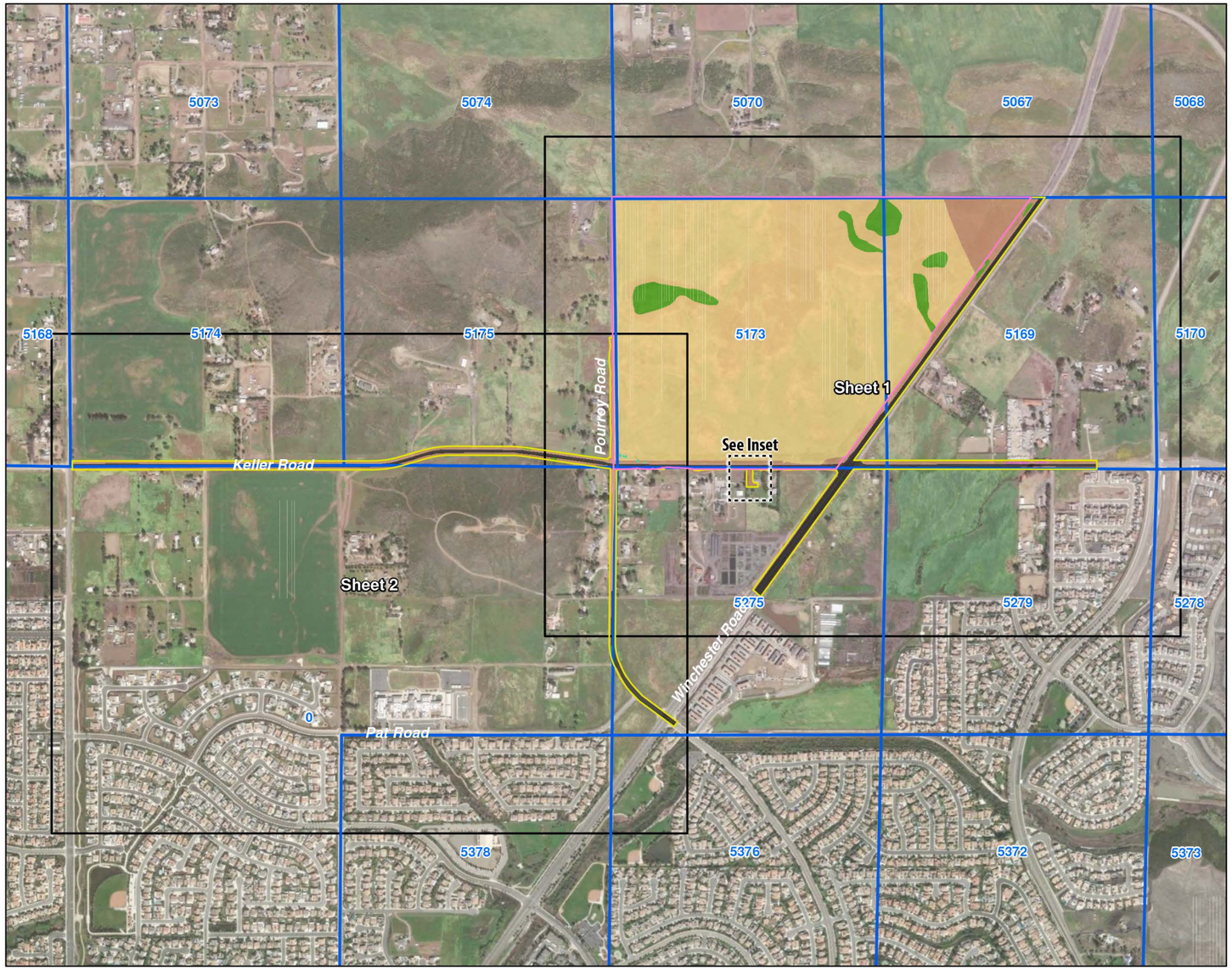
## 4.4.1 Existing Conditions

Based on historical aerial photography dating back to the 1960s, the onsite Project has been developed for agricultural uses resulting in extensive ground disturbance, and has been maintained by regular mowing and disking. The topography within the onsite Project slopes downward from the north to south from 1,587 feet to 1,422 feet above mean sea level (amsl). The Project's offsite impact areas generally consist of developed roads and disturbed roadside areas. (GLA, 2025, p. 41)

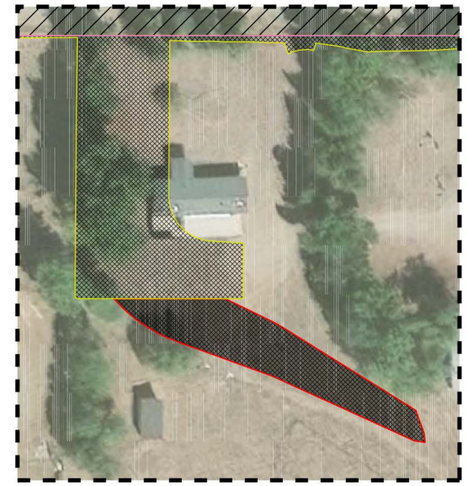
Under existing conditions, the Project site exhibits previously graded and highly compacted soils. Due to the decades of agriculture practices and disturbances throughout the Project site, the hydrology has been modified. However, the topography conveys storm flows in a general west to east direction, depending on rainfall amounts, through the site towards Warm Springs Creek and eventually to Murrieta Creek. The Project contains ephemeral earthen drainages. (GLA, 2025, pp. 41-42)

### A. Vegetation/Land Use Mapping

The Project site and off-site improvement areas (herein, "Study Area") support the following vegetation/land cover types: agriculture, developed, disturbed, disturbed buckwheat scrub, ornamental, and disturbed mulefat scrub. Table 4.4-1, *Summary of Vegetation/Land Use Types*, provides a summary of the vegetation types and their corresponding acreages, which are depicted on Figure 4.4-1, *Vegetation/Land Use Map*. Photographs depicting the Project site are included in Exhibit 8 of the Project's BTR (*Technical Appendix C1*).




Inset



- Project – Offsite (Addendum Area)
- Project - Onsite
- Project - Offsite
- Criteria Cells
- Agriculture
- Developed
- Disturbed
- Disturbed Buckwheat Scrub
- Disturbed Mulefat Scrub
- Ornamental

Source(s): Glenn Lukos Associates, 2025

Figure 4.4-1

Not to Scale

Vegetation/Land Use Map

**Table 4.4-1 Summary of Vegetation/Land Use Types**

| Vegetation/Land Use Type | Inside Criteria Cell | | Outside Criteria Cell | | Total Project (Acres) |
|---|---|---|---|---|---|
| | Onsite (acres) | Offsite (acres) | Onsite (acres) | Offsite (acres) | |
| Agriculture | 175.23 | 0 | 0 | 0 | 175.23 |
| Developed | 1.44 | 13.18 | 0 | 0.96 | 15.58 |
| Disturbed | 10.47 | 13.30 | 0.02 | 3.73 | 27.51 |
| Disturbed Buckwheat Scrub | 8.64 | 0.39 | 0 | 0.08 | 9.11 |
| Ornamental | 0.08 | 0.34 | 0 | 0.13 | 0.55 |
| Disturbed Mulefat Scrub | 0.05 | 0 | 0 | 0 | 0.05 |
| **Total** | **195.92** | **27.21** | **0.02** | **4.89** | **228.02** |

*Sum of individual parts may not equal total Project acres due to rounding error.
(GLA, 2025, Table 4-1; GLA, 2026, p. 18)

### *2. Agriculture*

Approximately 175.23 acres of the Project site previously consisted of active agriculture lands in 2021, and agriculture practices have been noted on the Project site historically. However, based on field visits conducted in 2025, the active agricultural lands were no longer under cultivation and were instead best characterized as *Hirschfeldia incana – Centaurea melitensis Herbaceous Semi-Natural Alliance*. The *Hirschfeldia incana – Centaurea melitensis Herbaceous Semi-Natural Alliance*, as it occurs on the Project site, is dominated by summer mustard and tocalote. Co-dominant herbaceous species in order of descending dominance include ripgut brome (*Bromus diandrus*), foxtail barley (*Hordeum murinum*), cheeseweed (*Malva neglecta*), paniculate tarplant (*Deinandra paniculata*), stinknet (*Oncosiphon pilulifer*), red brome (*Bromus rubens*), rattail fescue (*Festuca myuros*), sacred datura (*Datura wrightii*), vinegarweed (*Trichostema lanceolatum*), miniature lupine (*Lupinus bicolor*), Russian thistle (*Salsola tragus*), and black mustard (*Brassica nigra*). (GLA, 2025, p. 42)

### *3. Developed*

Approximately 15.58 acres of developed areas (1.44 acres onsite and 14.14 acres offsite) occur within the Study Area in the form of unpaved access roads, paved vehicular roads, and developed infrastructure such as buildings. These areas are routinely maintained and are primarily unvegetated. (GLA, 2025, p. 43)

### *4. Disturbed*

Approximately 27.51 acres of disturbed areas occur within the Study Area. A total of 10.49 acres occur onsite and 17.03 acres occur offsite. The northeastern portion of the onsite Project was burned in a brushfire immediately prior to the 2021 vegetation mapping effort and contained only the charred remains of vegetation. In 2025, vegetation had regrown in the burned area, and the previously burned area along with the other onsite areas mapped as disturbed are consistent with the *Hirschfeldia incana – Centaurea melitensis* Herbaceous Semi-Natural Alliance. A portion of the vegetated roadside areas in the onsite and offsite area mapped as disturbed are best characterized as *Hordeum murinum* Herbaceous Semi-Natural

Alliance (Foxtail Barley Grasslands). The *Hordeum murinum* Herbaceous Semi-Natural Alliance, as it occurs on the project site, is dominated by foxtail barley. Codominant herbaceous species in order of descending dominance include common stork's bill (*Erodium cicutarium*), summer mustard, black mustard, cheeseweed, vinegarweed, miniature lupine, arroyo lupine (*Lupinus succulentus*), and sacred datura. (GLA, 2025, p. 43; GLA, 2026, p. 18)

### *5. Disturbed Buckwheat Scrub*

Approximately 9.11 acres of disturbed buckwheat scrub occur in patches throughout the Study Areas, with the largest area occurring along the northeastern and northwestern portion of the Project site. A total of 8.64 acres of disturbed buckwheat scrub occurs onsite and a total of 0.47-acre occurs offsite. (GLA, 2025, p. 43)

While the majority of the Project site has been disturbed due to agricultural uses, these areas remained primarily undisturbed due to the steepness of the terrain. These areas are dominated by California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*), brittlebush (*Encelia farinosa*), ripgut brome (*Bromus diandrus*), and red brome (*Bromus madritensis ssp. rubens*). Of the areas mapped in 2021 as disturbed buckwheat scrub, *Eriogonum fasciculatum* Shrubland Alliance (California Buckwheat Scrub) and *Encelia farinosa* Shrubland Alliance (Brittle Bush Scrub) are present in different portions of this vegetation community. (GLA, 2025, p. 43)

The *Eriogonum fasciculatum* Shrubland Alliance, as it occurs within the Study Area, is dominated by California buckwheat. Co-dominant shrubs in order of descending dominance include cane cholla (*Cylindropuntia bernardina*), wishbone bush (*Mirabilis laevis*), brittle bush, California sagebrush, and coastal prickly pear (*Opuntia littoralis*). In many areas, the interstitial spaces between shrubs are occupied by herbaceous species such as coast morning glory (*Calystegia macrostegia*), climbing milkweed (*Funastrum cynanchoides* var. *hartwegii*), summer mustard, ripgut brome, foxtail barley, tocalote, cheeseweed, stinknet, red brome, rattail fescue, sacred datura, miniature lupine, and Russian thistle. (GLA, 2025, p. 44)

The *Encelia farinosa* Shrubland Alliance was previously lumped into the classification "Disturbed Buckwheat Scrub," but the relative cover of mapped brittle bush in a portion of the mapped Disturbed Buckwheat Scrub satisfies the membership rules for the Encelia farinosa Shrubland Alliance. These areas are dominated by brittle bush. Co-dominant shrubs include California buckwheat. In many areas, the interstitial spaces between shrubs are occupied by herbaceous species such as coast morning glory, climbing milkweed, summer mustard, ripgut brome, foxtail barley, tocalote, cheeseweed, stinknet, red brome, rattail fescue, sacred datura, miniature lupine, and Russian thistle. (GLA, 2025, p. 44)

### *6. Disturbed Mulefat Scrub*

The Study Area supports 0.05-acre of disturbed mulefat scrub, all of which is onsite in association with Drainage A. Based on the minimal riparian vegetation and scattered shrubs, this area does not comprise a distinct community, but it was categorized as such for consistency with riparian mapping as part of the Project's jurisdictional delineation. Component species include a single red willow (*Salix laevigata*) and a

small number of mulefat (*Baccharis salicifolia*) shrubs, with an understory of non-native grasses and forbs including summer mustard, foxtail barley, and annual brome grasses. This area of vegetation consists of a few scattered mulefat individuals and a single red willow tree spread along a drainage segment, and it does not clearly meet the membership rules for any particular riparian habitat type. The presence of a single willow without a contiguous canopy indicates that this area does not function as a woodland or forest community, and as such a red willow riparian woodland and forest designation would not be appropriate. One of the three membership rules for the Baccharis salicifolia Shrubland Alliance (mulefat thickets) states that Baccharis salicifolia comprises greater than 50 percent relative cover in shrub canopy. Given the predominance of mulefat in the mapped polygon, the *Baccharis salicifolia* Shrubland Alliance is the best fit. (GLA, 2025, p. 44)

#### *7. Ornamental*

The Study Area contains 0.55-acre of ornamental plantings, including 0.08-acre onsite and 0.47-acre offsite. Ornamental plantings predominantly consist of non-native horticultural plants and trees, including introduced trees, shrubs, and annual plants. Ornamental plantings are associated with residential land use adjacent to proposed off-site improvements. Species observed include Aleppo pine (*Pinus halepensis*), oleander (*Nerium oleander*), blue gum (*Eucalyptus globulus*), orange (*Citrus* x *sinensis*), and Peruvian pepper (*Schinus molle*). (GLA, 2025, pp. 44-45)

### B. Special-Status Vegetation Communities

The California Natural Diversity Database (CNDDB) identifies the following nine special-status vegetation communities for the Winchester and surrounding quadrangle maps: Desert Fan Palm Oasis Woodland, Southern Coast Live Oak Riparian Forest, Southern Cottonwood Willow Riparian Forest, Southern Interior Basalt Flow Vernal Pool, Southern Mixed Riparian Forest, Southern Riparian Scrub, Southern Sycamore Alder Riparian Woodland, Southern Willow Scrub, and Valley Needlegrass Grassland. The Study Area does not contain any special-status vegetation communities. (GLA, 2025, p. 45)

### C. Special-Status Plants

As noted in Section 1.5.2 of the Project's BTR (*Technical Appendix C1*), portions of the Study Area occur within a Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Narrow Endemic Plant Species Survey Area (NEPSSA) as well as the MSHCP Criteria Area Plant Species Survey Area (CAPSSA); therefore, pursuant to the MSHCP, those target species were evaluated. Surveys were conducted during the appropriate blooming period for special-status plants including NEPSSA and CAPSSA species that have potential to occur. Table 4-2 of *Technical Appendix C1* provides a list of special-status plants evaluated for the Study Area through general biological surveys and habitat assessments. Species were evaluated based on the following factors: 1) species identified by the CNDDB and California Native Plant Society (CNPS) as occurring (either currently or historically) on or in the vicinity of the Study Area, and 2) any other special status plants that are known to occur within the vicinity of the Study Area, or for which potentially suitable habitat occurs within the Study Area.

Only one special-status plant, paniculate tarplant (*Deinandra paniculata*, CNPS 4.2), was observed within the Study Area in 2021 and 2025 (GLA, 2025, p. 45).

#### *1. Paniculate Tarplant*

GLA observed several paniculate tarplant (CNPS 4.2) individuals within the Project site in association with the agricultural and disturbed buckwheat scrub areas. This species is a member of the aster family (Asteraceae) and is designated as a CNPS List 4.2 species. This annual herb is known to occur in vernally mesic, sometimes sandy soils in coastal scrub, valley and foothill grassland, and vernal pools from 80 to 3,085 feet (25 to 940 meters) amsl. This is known to occur from the central coast and southern California counties and is known to bloom from March through November. The population occurs in multiple discrete patches and was initially observed during the focused rare plant survey visit on May 5, 2021, and again during a focused plant survey visit on May 22, 2025, with additional individuals observed incidentally during burrowing owl survey visits in June and July 2025. (GLA, 2025, p. 51)

### D. Special-Status Animals

Table 4-3 of the Project's BTR (Technical Appendix C1) provides a list of special-status animals evaluated for the Study Area through general biological surveys, habitat assessments, and focused surveys. Species were evaluated based on the following factors, including: 1) species identified by the CNDDB as occurring (either currently or historically) on or in the vicinity of the Study Area, 2) applicable MSHCP survey areas, and 3) any other special-status animals that are known to occur within the vicinity of the Study Area or for which potentially suitable habitat occurs within the Study Area. (GLA, 2025, p. 51)

The following special-status animals were detected within the Study Area: California horned lark (*Eremophila alpestris actia*, California Department of Fish and Wildlife [CDFW]-Watch List [WL]) and northern harrier (*Circus cyaneus*, CDFW-Species of Special Concern [SSC]). (GLA, 2025, p. 51)

#### *1. Special-Status Animal Species Observed within the Study Area*

##### *Northern Harrier*

The northern harrier is designated by CDFW as an SSC when nesting and is a covered species under the MSHCP. The northern harrier frequents open wetlands, upland prairies, mesic grasslands, drained marshlands, croplands, shrub-steppe, meadows, grasslands, desert sinks, fresh and saltwater emergent wetlands, and is seldom found in wooded areas. Harriers nest on the ground in marshland habitats and prefer dense areas of grasses, willows, and cattails. Threats to northern harriers include conversion of native grassland to agriculture, habitat fragmentation, and loss of wetland/marsh habitats. (GLA, 2025, p. 57)

GLA biologists observed an individual northern harrier foraging on four separate visits to the onsite Project in 2021. This species is not expected to nest within the Project site due to the lack of suitable nesting habitat. A total of 211.71 acres of foraging habitat for the northern harrier is present. (GLA, 2025, p. 57)

***California Horned Lark***

The California horned lark is designated by CDFW as a WL when nesting and is a covered species under the MSHCP as well as a planning species for the Southwest Area Plan Subunit 5 – French Valley/Lower Sedco Hills. This species is found in a variety of open habitats, usually where trees and large shrubs are absent. Found from grasslands along the coast and deserts near sea level to alpine dwarf-shrub habitat above tree line. This species nests on the ground in open habitats with low, sparse vegetation. (GLA, 2025, p. 58)

GLA biologists observed individuals foraging on the Project site in 2021 and 2025. This species is also expected to nest within the Project site. A total of 202.61 acres of foraging habitat for the horned lark is present. (GLA, 2025, p. 58)

***American Badger***

The American badger is designated as an SSC and is not a covered species under the MSHCP. This species prefers open areas and may also frequent brushlands with little groundcover. When inactive, it occupies underground burrow. Young are born in underground burrows. (GLA, 2025, p. 58)

GLA biologists observed a single dead American badger as roadkill in 2025 in the Project's offsite improvement areas north of Keller Road along the western shoulder of Winchester Road. This species may occasionally occur on the site for foraging and for local/regional movement. However, this species is not expected to utilize the Project site for live-in habitat, including for natal denning, as burrows suitable for badgers were not incidentally observed during surveys. A total of 211.71 acres of potential foraging habitat for the American badger is present. (GLA, 2025, p. 58)

***2. Special-Status Wildlife Species Not Observed but with a Potential to Occur within the Study Area***

***Coast Horned Lizard***

The coast horned lizard is designated by CDFW as an SSC and is a covered species under the MSHCP. In California, the coast horned lizard ranges from the Transverse Ranges south to the Mexican border west of the deserts, although the taxon occurs on scattered sites along the extreme western desert slope of the Peninsular Ranges. The known elevation range of this species is from 33 feet (10 meters) to approximately 7,000 feet (2,130 meters) in the San Jacinto Mountains, in Riverside County. This species is found in a wide variety of vegetation types including coastal sage scrub, annual grassland, chaparral, oak woodland, riparian woodland and coniferous forest. In inland areas, this species is restricted to areas with pockets of open microhabitat, created by disturbance (e.g., floods, fire, roads, grazed areas, fire breaks). Extensive habitat loss from agriculture and urbanization, have been the main reasons cited for the decline of this species. This species been known to occur within the vicinity of the Project and it has a low to moderate potential to occur within the disturbed buckwheat scrub, disturbed, agriculture, and disturbed mulefat scrub habitats. A total of 211.76 acres of habitat for the coast horned lizard is present. (GLA, 2025, p. 58)

***Coastal Whiptail***

The coastal whiptail is designated by CDFW as an SSC and is a covered species under the MSHCP. The coastal whiptail ranges through the semi-arid lowlands of coastal southern California. The coastal whiptail is often found open areas of grassland, sage scrub, chaparral, and alluvial wash habitats. This species is known to occur in the vicinity of the Study Area and has moderate potential to occur within the disturbed buckwheat scrub, agriculture, and disturbed habitats. A total of 211.71 acres of habitat for the coastal whiptail is present. (GLA, 2025, p. 59)

***Orange-throat Whiptail***

The orange-throat whiptail is designated by CDFW as a WL and is a covered species under the MSHCP. This species is often found in coastal sage scrub, chaparral, non-native grassland, oak woodland, and juniper woodland. This species is known to occur in the vicinity of the Project and has low to moderate potential to occur within the disturbed buckwheat scrub, agriculture, and disturbed habitats. A total of 211.71 acres of habitat for the orange-throat whiptail is present. (GLA, 2025, p. 59)

***Red-Diamond Rattlesnake***

The red-diamond rattlesnake is designated by CDFW as an SSC and is a covered species under the MSHCP. From an ecological standpoint, this rattlesnake species has a wide tolerance for varying environments. Although this species is recorded from a number of vegetation types, it is most commonly associated with heavy brush with large rocks or boulders. Threats include habitat loss due to development, fragmentation, off-road vehicle use, and the deliberate removal of individuals near residential and recreational lands. This species is known to occur in the vicinity of the Study Area and has a moderate potential to occur within the rock outcrops, buckwheat scrub, agriculture, and disturbed habitats. A total of 211.71 acres of habitat for the red diamond rattlesnake is present within the Project. (GLA, 2025, p. 59)

***Bell's Sage Sparrow***

The Bell's sage sparrow is designated by CDFW as WL and is a covered species under the MSHCP as well as a planning species for the Southwest Area Plan Subunit 5 – French Valley/Lower Sedco Hills. This species is often found in chaparral and coastal sage scrub along the coastal lowlands, inland valleys, and in the lower foothills of local mountains. This species is known to occur in the vicinity of the Study Area and has moderate potential to occur within the disturbed buckwheat scrub and disturbed habitats. A total of 36.75 acres of habitat for the sage sparrow is present. (GLA, 2025, p. 59)

***Golden Eagle***

The golden eagle is designated by CDFW as Fully Protected (FP) and is a covered species under the MSHCP. This species is often found in grasslands, brushlands, deserts, oak savannas, open coniferous forests, and montane valleys. This species nests on rock outcrops and ledges. This species is known to occur in the vicinity of the Study Area and has low potential to forage within the Study Area within the agriculture and disturbed habitats. A total of 202.61 acres of foraging habitat for the golden eagle is present. (GLA, 2025, pp. 59-60)

***Loggerhead Shrike***

The loggerhead shrike is designated as an SSC when nesting and is a covered species under the MSHCP. This species is found throughout the foothills and lowlands of California as a resident. This species is known to forage over open ground within areas of short vegetation, pastures with fence rows, grasslands, riparian areas, open woodland, agricultural fields, desert washes, and desert scrub. This species commonly nests within dense, mainly thorny, vegetation and may use areas where tumbleweed has concentrated. This species is known to occur in the vicinity of the Study Area and has low potential to forage and nest within the Study Area. A total of 211.71 acres of habitat for the shrike is present. (GLA, 2025, p. 60)

***Southern California Rufous-Crowned Sparrow***

The Southern California rufous-crowned sparrow is designated as a WL when nesting and is a covered species under the MSHCP as well as a planning species for the MSHCP Southwest Area Plan Subunit 5 – French Valley/Lower Sedco Hills. This species is found grass covered hillsides, coastal sage scrub, and chaparral. This species commonly nests on the ground at the base of a shrub. This species is known to occur in the vicinity of the Study Area and has moderate potential to forage and nest within the Study Area. A total of 211.71 acres of foraging habitat for the rufous-crowned sparrow is present. (GLA, 2025, p. 60)

***White-Tailed Kite***

The white-tailed kite is designated by CDFW as a FP species, is considered locally rare when nesting, and is a covered species under the MSHCP. This species inhabits low elevation, open grasslands, savannah-like habitats, agricultural areas, wetlands, and oak woodlands. Riparian areas and forest edges adjacent to open areas are used for nesting. This species is known to occur in the vicinity of the Study Area and has moderate potential to forage and nest within the Study Area. A total of 211.71 acres of habitat for the kite is present. (GLA, 2025, p. 60)

### *3. Special-Status Wildlife Species Confirmed Absent Through Focused Surveys*

***Burrowing Owl***

The Project occurs within the MSHCP Burrowing Owl Survey Area; however, burrowing owl was confirmed absent from the Project during the 2021 and 2025 focused breeding season surveys. No burrowing owls were observed within the Project, and no burrowing owl sign was detected in association with burrows. (GLA, 2025, p. 60)

***Crotch's Bumble Bee***

Crotch's bumble bee is a candidate for listing as endangered under the California Endangered Species Act (CESA). Focused surveys conducted in 2025 did not detect the Crotch's bumble bee. This species is considered absent from the Study Area. (GLA, 2025, p. 61)

## E. Raptor Use

The Study Area provides suitable foraging habitat for a number of raptor species, including special-status raptors as discussed above (GLA, 2025, p. 61).

Southern California contains a diversity of birds of prey (raptors), many species of which are in decline. For most of the declining species, foraging requirements include extensive open, undisturbed, or lightly disturbed areas, especially grasslands. This type of habitat has declined severely in the region, affecting many species but especially raptors. A few species such as American kestrel (*Falco sparverius*) and red-tailed hawk (*Buteo jamaicensis*) are somewhat adaptable to low-level human disturbance and can be readily observed adjacent to neighborhoods and other types of development. These species still require appropriate foraging habitat and low levels of disturbance in the vicinity of nesting sites. (GLA, 2025, p. 61)

Many of the raptors that would be expected to forage and nest within western Riverside are fully covered species under the MSHCP, with the MSHCP providing the necessary conservation of both foraging and nesting habitats. Some common raptor species (e.g., American kestrel and red-tailed hawk) are not covered by the MSHCP but are expected to be conserved with implementation of the MSHCP due to the parallel habitat needs with those raptors covered under the MSHCP. The MSHCP does not provide Fish and Game Code take coverage for raptors covered under the Plan. (GLA, 2025, p. 61)

Appendix B (faunal compendium) of the Project's BTR (*Technical Appendix C1*) provides a list of the raptors detected over the course of the field studies. The Study Area lacks potential nesting habitat (e.g., mature trees, shrubs) for raptor species but is expected to provide marginal foraging habitat in the form of insects, spiders, lizards, snakes, small mammals, and other birds. (GLA, 2025, p. 61)

### F. Nesting Birds

The Project contains immature trees, shrubs, and ground cover that provide suitable habitat for nesting migratory birds. Mortality of migratory birds (including eggs) is prohibited under Sections 3505, 3503.5, and 3800 of the California Fish and Game Code (CFGC). Birds anticipated to nest on the Project would be those that are common to disturbed areas and include species such as killdeer (*Charadrius vociferus*) and mourning dove (*Zenaida macroura*). (GLA, 2025, p. 61)

### G. Wildlife Linkages/Corridors and Nursery Sites

Habitat linkages are areas which provide a connection between two or more other habitat areas which are often larger or superior in quality to the linkage. Such linkage sites can be quite small or constricted but can be vital to the long-term health of connected habitats. Linkage values are often addressed in terms of "gene flow" between populations, with movement potentially taking many generations. (GLA, 2025, p. 62)

Corridors are similar to linkages but provide specific opportunities for individual animals to disperse or migrate between generally extensive but otherwise partially or wholly separated regions. Adequate cover and tolerably low levels of disturbance are common requirements for corridors. Habitat in corridors may be quite different from habitat(s) in the connected areas but if used by the wildlife species of interest, the corridor will still function as desired. (GLA, 2025, p. 62)

The Project site occurs within MSHCP Proposed Constrained Linkage 17 (Paloma Valley). Proposed Constrained Linkage 17 is located in the south-central region of the MSHCP Plan area. Proposed Extension of Existing Core 7 (Lake Skinner/Diamond Valley Lake Extension) is located to the east of this Linkage. The Linkage provides Habitat for species and also provides for movement of species. Although this Linkage is constrained by existing urban development and agricultural use along much of its length, planned land uses surrounding the Constrained Linkage are nearly entirely rural. In addition, the Constrained Linkage has a comparatively low Perimeter to Area Ratio. Thus, Edge Effects on this Constrained Linkage may be substantially lower than for other Constrained Linkages. (GLA, 2025, p. 62)

### H. Critical Habitat

The Study Area does not occur within any lands mapped as Critical Habitat by the United States Fish and Wildlife Service (USFWS) (GLA, 2025, p. 62).

### I. Jurisdictional Waters

Potential jurisdictional features analyzed as part of the field investigation include ten ephemeral drainage features that occur within the Study Area, referred to herein as Drainages A, A-1, B, C, D, E, F, G, H, and I. These features extend across the Study Area in a general southerly direction (except for Drainages B and H, which drain in a southwesterly direction). With the exception of Drainages A, A-1, H, and I, the majority of these drainages originate onsite and convey surface runoff and/or storm water runoff from the adjacent hillsides. The drainages occur on vacant agricultural land with a majority of the site being disked on a regular basis. Elevations range from approximately 1,420 to 1,560 feet above mean sea level. Off-site flows ultimately are conveyed east below State Route (SR) 79, southwest to Warm Springs Creek, and onward to Murrieta Creek. (GLA, 2025, pp. 62-63)

#### *1. Overview of Drainages*

***Drainage A***

Drainage A is an ephemeral blue-line drainage that comprises approximately 808 linear feet within the Project site. No wetlands are associated with this feature. (GLA, 2025, p. 63)

Drainage A enters the southwestern corner of the Project site via road runoff and nuisance flows from the surrounding areas. Drainage A meanders in a general easterly/southeasterly direction for a collective 721 linear feet onsite and 87 linear feet offsite, before exiting the Project site southeast towards Winchester Road/SR-79. Flows from Drainage A ultimately are conveyed into the storm drain system west of SR-79, which drains southwest to Warm Springs Creek, and onward to Murrieta Creek. The channel bottom supports a sandy loam substrate and was completely dry during GLA's field delineation despite recent rainfall events. (GLA, 2025, p. 63)

Drainage A is dominated by upland weedy species common throughout the Project, including black mustard (*Brassica nigra*), common barley (*Hordeum vulgare*), tocalote (*Centaurea melitensis*), ripgut brome (*Bromus diandrus*), golden crown beard (*Verbesina enceliodes*) smooth cat's ear (*Hypochaeris glabra*), Russian

thistle (*Salsola ssp.*), dove weed (*Croton setiger*), and wild oat (*Avena fatua*). The westerly drainage reach contains a single red willow (*Salix laevigata*), one palo verde (*Parkinsonia aculeata*), and a few clumps of mulefat (*Baccharis salicifolia*). (GLA, 2025, p. 63)

***Drainage A-1***

Drainage A-1 is an ephemeral drainage that conveys road runoff and nuisance flows through a pipe culvert south of Keller Road in the offsite portion of the Study Area. This feature extends across the onsite portion of the Project site in a southerly direction for approximately 31 linear feet [24 feet onsite and 7 feet offsite] before leaving the Project site and continuing its flow path offsite and eventually converging with Drainage A downstream. Drainage A-1 contains nonnative upland grasses and weeds and was completely dry during the field delineation conducted by GLA. No wetlands or riparian areas are associated with this feature. (GLA, 2025, p. 63)

***Drainage B***

Drainage B is an ephemeral drainage that traverses the northwestern portion of the Project site in a general southwesterly direction for approximately 1,528 linear feet before entering the storm drain system at a small pipe culvert under Pourroy Road. This feature originates in the northwestern portion of the Project site and conveys stormwater runoff from the adjacent hillsides. This feature is somewhat erosional in portions and was completely dry during the field delineation conducted by GLA. No wetlands or riparian areas are associated with this feature. Drainage B is dominated by black mustard, common barley, sparse cocklebur (*Xanthium spinosum*), ripgut brome, and vinegar weed (*Trichostema lanceolatum*). (GLA, 2025, p. 63)

***Drainage C***

Drainage C is an ephemeral drainage that extends across the western portion of the Project site in a southerly direction for approximately 1,725 linear feet before dissipating onsite as sheet flow towards a roadside pipe culvert at the southern Project boundary. This feature originates onsite and conveys stormwater runoff from the adjacent hillsides. This feature is somewhat erosional in portions and was completely dry during the field delineation conducted by GLA. No wetlands or riparian areas are associated with this feature. Drainage C is dominated by black mustard, common barley, sparse cocklebur, ripgut brome, and vinegar weed. (GLA, 2025, p. 64)

***Drainage D***

Drainage D is an ephemeral drainage that extends across the west-central portion of the Project site in a southerly direction for approximately 1,205 linear feet before dissipating onsite as sheet flow towards a roadside pipe culvert at the southern Project boundary. This feature originates onsite and conveys stormwater runoff from the adjacent hillsides. This feature is somewhat erosional in portions and was completely dry during our field delineation. No wetlands or riparian areas are associated with this feature. (GLA, 2025, p. 64)

***Drainage E***

Drainage E is an ephemeral drainage that extends across in central/east-central portion of the site in a southeasterly direction for approximately 2,722 linear feet before dissipating onsite as sheet flow towards a culvert along the eastern project boundary. This feature originates onsite and conveys stormwater runoff from the adjacent hillsides. This feature is somewhat erosional in portions and completely dry during the field delineation conducted by GLA. No wetlands or riparian areas are associated with this feature. Drainage E is dominated by black mustard, common barley, sparse cocklebur, ripgut brome, and vinegar weed. (GLA, 2025, p. 64)

***Drainage F***

Drainage F is an ephemeral drainage that extends across the eastern portion of the Project site in a southerly direction for approximately 888 linear feet before dissipating onsite as sheet flow. This feature originates onsite and conveys stormwater runoff from the adjacent hillsides. This feature is somewhat erosional in portions and was completely dry during our field delineation. No wetlands or riparian areas are associated with this feature. Drainage F is dominated by black mustard, common barley, sparse cocklebur, ripgut brome, and vinegar weed. (GLA, 2025, p. 64)

***Drainage G***

Drainage G is an ephemeral drainage that enters the Project site from the northeast and extends in a southerly direction for approximately 1,009 linear feet (977 feet onsite and 32 feet offsite) before exiting the eastern Project boundary adjacent to SR 79. At this point, flows enter a concrete culvert beneath SR 79 and continue offsite. This feature conveys stormwater runoff from the adjacent hillsides and is somewhat erosional in portions. Drainage G was completely dry during our field delineation and no wetlands are associated with this feature. Drainage G is dominated by similar vegetation with the addition of buckwheat along the banks. (GLA, 2025, pp. 64-65)

***Drainage H***

Drainage H is an ephemeral drainage feature associated with the eastern portion of the offsite Project area along Keller Road. This feature totals approximately 139 linear feet and is completely unvegetated with the exception of planted Peruvian pepper trees (Schinus molle). overhanging the upper banks. Drainage H was completely dry during the field delineation conducted by GLA and no wetlands or riparian areas are associated with this feature. (GLA, 2025, p. 65)

***Drainage I***

Drainage I is an ephemeral drainage feature located on the northwest side of Pourroy Road in the offsite portion of the Study Area. This feature conveys road runoff and totals approximately 77 linear feet. Drainage I is unvegetated and was completely dry during the field delineation conducted by GLA. No wetlands or riparian areas are associated with this feature. (GLA, 2025, p. 65)

### *2. Jurisdictional Waters and Wetlands*

#### *United States Army Corps of Engineers Jurisdictional Waters*

Pursuant to 33 CFR Part 325.9, the onsite and offsite Project does not contain waters of the U.S.; therefore, no Corps jurisdiction is associated with the onsite and offsite Project. (GLA, 2025, p. 65)

The Study Area supports several ephemeral drainage features (Drainages A-I) that flow only in direct response to precipitation (e.g., rain). On April 6, 2021, the Corps issued an Approved Jurisdictional Determination (AJD) for the Project confirming that the none of the drainages in the Study Area are subject to Corps jurisdiction. (GLA, 2025, p. 65)

#### *Regional Water Quality Control Board Jurisdiction*

The San Diego Regional Quality Control Board (RWQCB) jurisdiction associated with Project totals 0.54-acre of waters the State, none of which consists of State wetlands. 0.51-acre of jurisdiction occurs on the Project site with the remaining 0.03-acre occurring offsite. A total of 10,132 linear feet of ephemeral stream is present consisting of 9,790 feet onsite and 342 feet offsite. (GLA, 2025, p. 65)

RWQCB jurisdiction is limited to ten ephemeral drainage features (Drainages A, A-1, B, C, D, E, F, G, H, and I) that convey surface water only in direct response to precipitation (e.g., rain). These features exhibit flow sign indicators as evidenced by changes in soil characteristics and incised channel banks. On April 6, 2021, the Corps issued an AJD for the Project in concurrence with the Navigable Waters Protection Rule (NWPR). Pursuant to the NWPR, ephemeral features are not subject to Corps jurisdiction pursuant to Section 404 of the CWA. Since ephemeral features are not subject to Corps jurisdiction pursuant to Section 404 of the CWA, these features are also not subject to Regional Board jurisdiction pursuant to Section 401 of the CWA. However, since these features convey surface flow with the potential to support beneficial uses, they are considered to be waters of the State that would be regulated by the Regional Board pursuant to Section 13260 of the California Water Code (CWC)/the Porter-Cologne Act. (GLA, 2025, pp. 65-66)

Table 4.4-2, *Summary of Potential Regional Board Jurisdiction*, summarizes RWQCB jurisdictional waters associated with the Study Area, which are described above. The areas subject to RWQCB jurisdiction are depicted on Figure 4.4-2 and Figure 4.4-3, *RWQCB Jurisdictional Delineation Map*. (GLA, 2025, p. 66)

#### *CDFW Jurisdiction*

CDFW jurisdiction associated with the Study Area totals 0.63-acre, of which 0.05-acre consists of riparian stream and 0.58-acre consists of non-riparian stream. A total of 10,132 linear feet of ephemeral stream is present. This includes 136 linear feet of riparian stream and 9,996 linear feet of non-riparian stream and includes all areas within RWQCB jurisdiction. Of the 10,132 linear feet of stream, 9,790 feet is onsite and 342 feet is offsite. (GLA, 2025, p. 66)

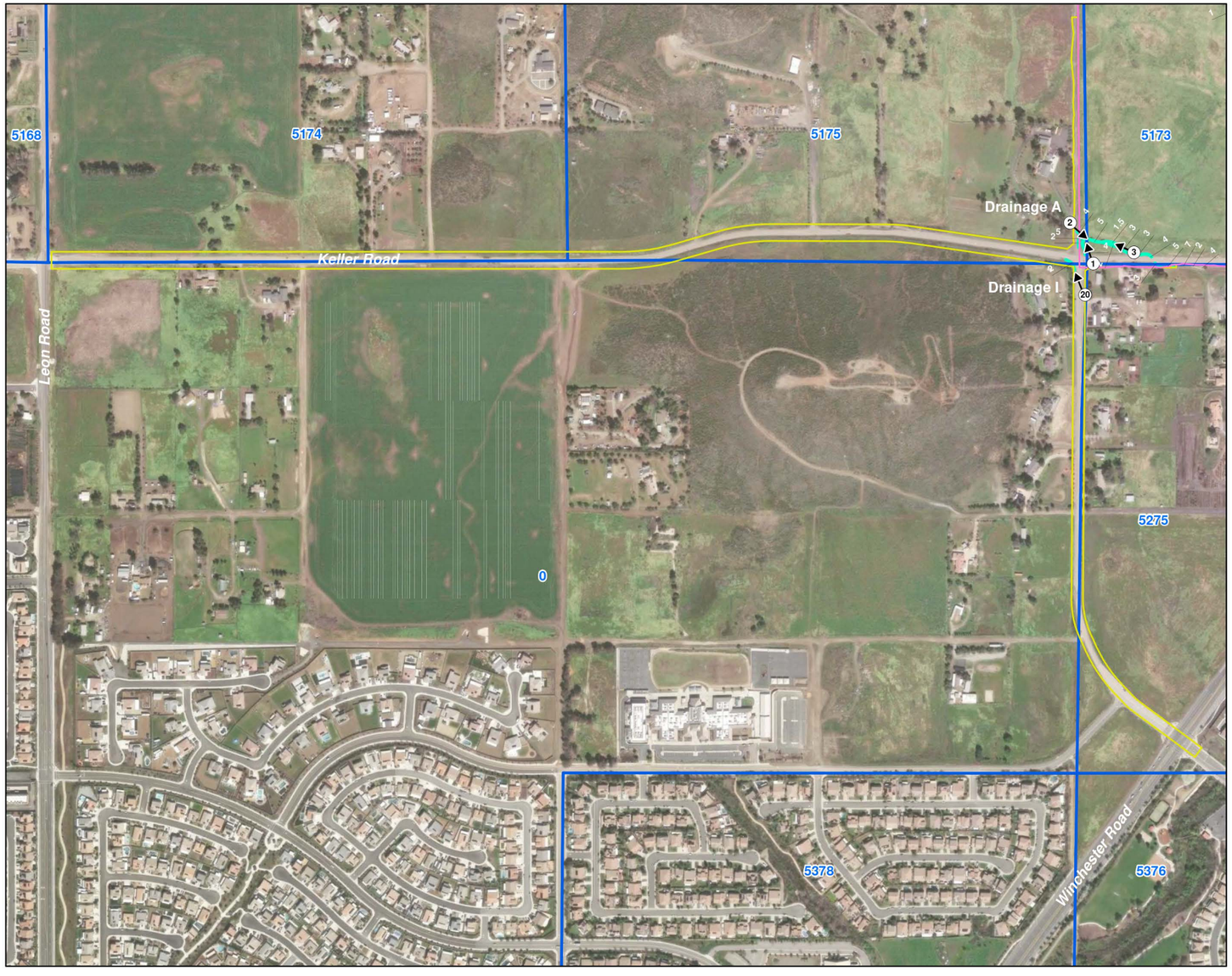



Source(s): Glenn Lukos Associates, 2025

Figure 4.4-2

Not to Scale

RWQCB Jurisdictional Delineation Map (1 of 2)




Source(s): Glenn Lukos Associates, 2025

Figure 4.4-3

Not to Scale

RWQCB Jurisdictional Delineation Map (2 of 2)

**Table 4.4-2 Summary of Potential Regional Board Jurisdiction**

| Drainage Name | Regional Board Non-Wetland Waters of the State (acres) | Regional Board State Wetlands (acres) | Total Regional Board Jurisdiction (acres) | Length (linear feet) |
|---|---|---|---|---|
| Drainage A | 0.07 | 0.00 | 0.07 | 808 |
| Drainage A-1 | 0.004 | 0.00 | 0.004 | 31 |
| Drainage B | 0.04 | 0.00 | 0.04 | 1,528 |
| Drainage C | 0.10 | 0.00 | 0.10 | 1,725 |
| Drainage D | 0.08 | 0.00 | 0.08 | 1,205 |
| Drainage E | 0.15 | 0.00 | 0.15 | 2,722 |
| Drainage F | 0.03 | 0.00 | 0.03 | 888 |
| Drainage G | 0.05 | 0.00 | 0.05 | 1,009 |
| Drainage H | 0.01 | 0.00 | 0.01 | 139 |
| Drainage I | 0.004 | 0.00 | 0.004 | 77 |
| **Total*:** | **0.54** | **0.00** | **0.54** | **10,132** |

*Sum of individual parts may not equal sum total due to rounding error.
(GLA, 2025, Table 4-4)

CDFW jurisdiction within the Study Area includes Drainages A, A-1, B, C, D, E, F, G, H, and I. These features exhibit defined stream flow indictors as evidenced by discernible channel banks, drainage patterns, and changes in soil characteristics. Since these features exhibit a discernable stream course, they are subject to regulation by the CDFW under Section 1602 of the CFGC. (GLA, 2025, p. 66)

The Study Area also contains topographic features, including swales and/or erosional areas that lack a defined stream course and do not convey adequate flow sign or a discernable channel banks. As these areas lack a discernable stream course, they are not subject to regulation by the CDFW under Section 1602 of the CFGC. (GLA, 2025, p. 66)

Table 4.4-3, *Summary of Potential CDFW Jurisdiction*, summarizes CDFW jurisdictional waters associated with the Study Area. Drainage descriptions are provided above. The boundaries of CDFW jurisdiction are depicted on Figure 4.4-4 and Figure 4.4-5, *CDFW Jurisdictional Delineation Map*. (GLA, 2025, p. 66)

***MSHCP Riparian/Riverine Areas and Vernal Pools***

Vegetation communities associated with riparian systems are considered special-status natural vegetation communities because, similar to coastal sage scrub, they have declined throughout southern California during past decades. In addition, they can support a large variety of special-status wildlife species. Most special-status species directly associated with MSHCP riparian/riverine resources are covered species under the MSHCP (under Section 6.1.2 of the Plan). The MSHCP has specific policies and procedures regarding the evaluation and conservation of riparian/riverine resources (including riparian vegetation) because it supports MSHCP covered species. Specifically, the MSHCP states that “riparian/riverine areas




Project - Onsite
Project - Offsite
Criteria Cells
CDFW Non-Riparian Stream
CDFW Riparian
Width of Non-Riparian Stream in Feet
Photo Location

Source(s): Glenn Lukos Associates, 2025

Figure 4.4-4

Not to Scale

CDFW Jurisdictional Delineation Map (1 of 2)




Source(s): Glenn Lukos Associates, 2025

Figure 4.4-5

Not to Scale

CDFW Jurisdictional Delineation Map (2 of 2)

**Table 4.4-3 Summary of Potential CDFW Jurisdiction**

| Drainage Name | CDFW Non-Riparian Stream (acres) | CDFW Riparian Stream (acres) | Total CDFW Jurisdiction (acres) | Length (linear feet) |
|---|---|---|---|---|
| Drainage A | 0.08 | 0.05 | 0.13 | 808 |
| Drainage A-1 | 0.004 | 0.00 | 0.004 | 31 |
| Drainage B | 0.04 | 0.00 | 0.04 | 1,528 |
| Drainage C | 0.10 | 0.00 | 0.10 | 1,725 |
| Drainage D | 0.09 | 0.00 | 0.09 | 1,205 |
| Drainage E | 0.17 | 0.00 | 0.17 | 2,722 |
| Drainage F | 0.03 | 0.00 | 0.03 | 888 |
| Drainage G | 0.05 | 0.00 | 0.05 | 1,009 |
| Drainage H | 0.01 | 0.00 | 0.01 | 139 |
| Drainage I | 0.004 | 0.00 | 0.004 | 77 |
| **Total:** | **0.58** | **0.05** | **0.63** | **10,132** |

*Sum of individual parts may not equal sum total due to rounding error.
(GLA, 2025, Table 4-5)

are natural lands which contain habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year." Thus, the MSHCP classification of riparian/riverine includes both riparian (depleted natural vegetation communities) as well as ephemeral drainages that are natural in origin but may lack riparian vegetation. For this analysis, all features that qualify as State streambeds under CDFW jurisdiction are considered MSHCP riparian/riverine resources. (GLA, 2025, p. 67)

MSHCP jurisdiction associated with the Study Area totals 0.63-acre, of which 0.05-acre consists of riparian stream and 0.58-acre consists of riverine stream. A total of 10,132 linear feet of ephemeral stream is present. This includes 136 linear feet of riparian stream and 9,996 linear feet of non-riparian riverine stream and includes all areas within CDFW jurisdiction. (GLA, 2025, p. 67)

MSHCP jurisdiction within the Study Area includes Drainages A, A-1, B, C, D, E, F, G, H, and I. These features exhibit defined stream flow indictors as evidenced by discernible channel banks, drainage patterns, and changes in soil characteristics. Since these features exhibit a discernable stream course, they are subject to regulation by Section 6.1.2 of the MSHCP. (GLA, 2025, p. 67)

Table 4.4-4, *Summary of Potential MSHCP Jurisdiction*, summarizes MSHCP jurisdictional waters associated with the Study Area. Drainage descriptions are provided above. The boundaries of MSHCP jurisdiction are depicted on Figure 4.4-6 and Figure 4.4-7, *MSHCP Riparian/Riverine Map*. (GLA, 2025, p. 68)

**Table 4.4-4 Summary of Potential MSHCP Jurisdiction**

| Drainage Name | Inside Criteria Cell | | | | Outside Criteria Cell | | | | Total MSHCP Jurisdiction (acres) | Length (linear feet) |
|---|---|---|---|---|---|---|---|---|---|---|
| | Onsite | | Offsite | | Onsite | | Offsite | | | |
| | MSHCP Riverine Stream (acres) | MSHCP Riparian Stream (acres) | MSHCP Riverine Stream (acres) | MSHCP Riparian Stream (acres) | MSHCP Riverine Stream (acres) | MSHCP Riparian Stream (acres) | MSHCP Riverine Stream (acres) | MSHCP Riparian Stream (acres) | | |
| Drainage A | 0.06 | 0.05 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.13 | 808 |
| Drainage A-1 | 0.004 | 0.00 | 0.001 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.004 | 31 |
| Drainage B | 0.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.04 | 1,528 |
| Drainage C | 0.10 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.10 | 1,725 |
| Drainage D | 0.09 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.09 | 1,205 |
| Drainage E | 0.17 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.17 | 2,722 |
| Drainage F | 0.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.03 | 888 |
| Drainage G | 0.05 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.05 | 1,009 |
| Drainage H | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 139 |
| Drainage I | 0.00 | 0.00 | 0.002 | 0.00 | 0.00 | 0.00 | 0.002 | 0.00 | <0.01 | 77 |
| **Total:** | **0.55** | **0.05** | **0.02** | **0.00** | **0.00** | **0.00** | **0.002** | **0.00** | **0.63** | **10,132** |

*Sum of individual parts may not equal the sum total due to rounding error.
(GLA, 2025, Table 4-6)



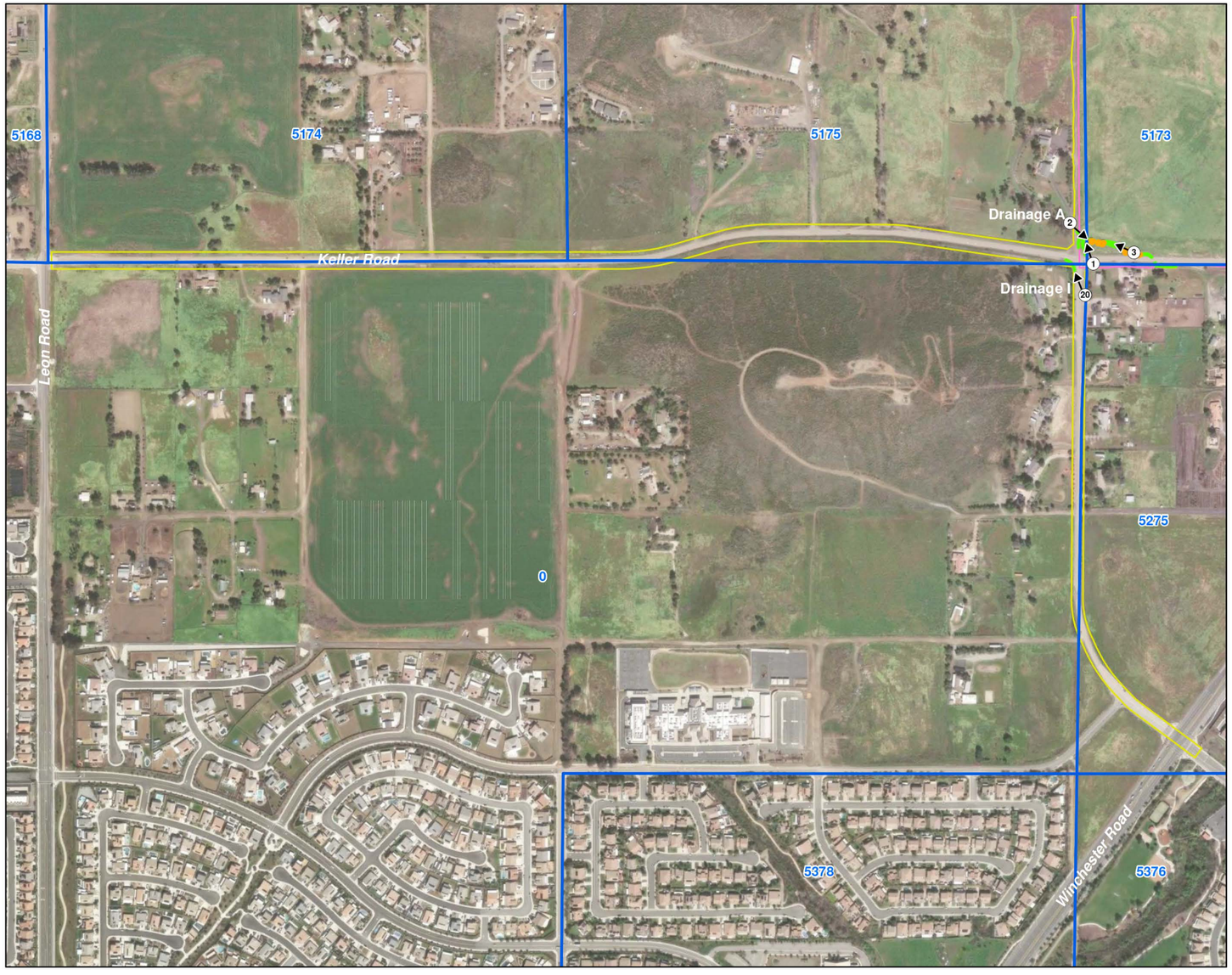

Project - Onsite
Project - Offsite
Criteria Cells
MSHCP Riverine
MSHCP Riparian
Photo Location

Source(s): Glenn Lukos Associates, 2025

Figure 4.4-6

Not to Scale

MSHCP Riparian/Riverine Map (1 of 2)




Source(s): Glenn Lukos Associates, 2025

Figure 4.4-7

Not to Scale

MSHCP Riparian/Riverine Map (2 of 2)

### 4.4.2 Applicable Environmental Regulations

The following is a brief description of the federal, State, and local environmental laws and related regulations governing the protection of biological resources.

#### A. Federal Regulations

##### *1. Endangered Species Act (ESA)*

The purpose of the federal Endangered Species Act (ESA) is to protect and recover imperiled species and the ecosystems upon which they depend. It is administered by the U.S. Fish and Wildlife Service (USFWS) and the Commerce Department's National Marine Fisheries Service (NMFS). The USFWS has primary responsibility for terrestrial and freshwater organisms, while the responsibilities of NMFS are mainly marine wildlife such as whales and anadromous fish such as salmon. Under the ESA, species may be listed as either endangered or threatened. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" means a species is likely to become endangered within the foreseeable future. All species of plants and animals, except pest insects, are eligible for listing as endangered or threatened.

The ESA makes it unlawful for a person to take a listed animal without a permit. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct." Through regulations, the term "harm" is defined as "an act which actually kills or injures wildlife. Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering." Listed plants are not protected from take, although it is illegal to collect or maliciously harm them on federal land. Protection from commercial trade and the effects of federal actions do apply for plants.

Section 7 of the ESA requires federal agencies to use their legal authorities to promote the conservation purposes of the ESA and to consult with the USFWS and NMFS, as appropriate, to ensure that effects of actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of listed species. During consultation, the "action" agency receives a "biological opinion" or concurrence letter addressing the proposed action. In the relatively few cases in which the USFWS or NMFS makes a jeopardy determination, the agency offers "reasonable and prudent alternatives" about how the proposed action could be modified to avoid jeopardy. It is extremely rare that a project ends up being withdrawn or terminated because of jeopardy to a listed species.

Section 10 of the ESA may be used by landowners including private citizens, corporations, tribes, states, and counties who want to develop property inhabited by listed species. Landowners may receive a permit to take such species incidental to otherwise legal activities, provided they have developed an approved habitat conservation plan (HCP). HCPs include an assessment of the likely impacts on the species from the proposed action, the steps that the permit holder will take to avoid, minimize, and mitigate the impacts, and the funding available to carry out the steps. HCPs may benefit not only landowners but also species by securing and managing important habitat and by addressing economic development with a focus on species conservation.

### *2. Clean Water Act Section 401*

Clean Water Act (CWA) § 401 water quality certification provides states and authorized tribes with an effective tool to help protect water quality, by providing them an opportunity to address the aquatic resource impacts of federally issued permits and licenses. Under § 401, a federal agency cannot issue a permit or license for an activity that may result in a discharge to waters of the U.S. until the state or tribe where the discharge would originate has granted or waived § 401 certification. The central feature of CWA § 401 is the state or tribe's ability to grant, grant with conditions, deny, or waive certification. Granting certification, with or without conditions, allows the federal permit or license to be issued consistent with any conditions of the certification. Denying certification prohibits the federal permit or license from being issued. Waiver allows the permit or license to be issued without state or tribal comment. States and tribes make their decisions to deny, certify, or condition permits or licenses based in part on the proposed project's compliance with Environmental Protection Agency (EPA)-approved water quality standards. In addition, states and tribes consider whether the activity leading to the discharge will comply with any applicable effluent limitations guidelines, new source performance standards, toxic pollutant restrictions, and other appropriate requirements of state or tribal law.

Many states and tribes rely on § 401 certification to ensure that discharges of dredge or fill material into a water of the U.S. do not cause unacceptable environmental impacts and, more generally, as their primary regulatory tool for protecting wetlands and other aquatic resources. However, § 401 is limited in scope and application to situations involving federally-permitted or licensed activities that may result in a discharge to a water of the U.S. If a federal permit or license is not required, or would authorize impacts only to waters that are not waters of the U.S., the activity is not subject to the CWA § 401.

### *3. Clean Water Act Section 404*

Section 404 of the CWA establishes a program to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Wetlands subject to Clean Water Act Section 404 are defined as "areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports) and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulation (e.g. certain farming and forestry activities).

The basic premise of the program is that no discharge of dredged or fill material may be permitted if: (1) a practicable alternative exists that is less damaging to the aquatic environment; or (2) the nation's waters would be significantly degraded. Applications for permits must, to the extent practicable: (l) demonstrate steps have been taken to avoid wetland impacts; (2) demonstrate that potential impacts on wetlands have

been minimized; and (3) provide compensation for any remaining unavoidable impacts. Proposed activities are regulated through a permit review process.

An individual permit is required for potentially significant impacts. Individual permits are reviewed by the U.S. Army Corps of Engineers (USACE), which evaluates applications under a public interest review, as well as the environmental criteria set forth in the CWA Section 404(b)(1) Guidelines. However, for most discharges that will have only minimal adverse effects, a general permit may be suitable. General permits are issued on a nationwide, regional, or State basis for particular categories of activities. The general permit process eliminates individual review and allows certain activities to proceed with little or no delay, provided that the general or specific conditions for the general permit are met. States also have a role in Section 404 decisions, through state program general permits, water quality certification, or program assumption.

#### *4. Executive Order 11990 – Protection of Wetlands*

The purpose of Executive Order (EO) 11990 is to "minimize the destruction, loss or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands." To meet these objectives, the Order requires federal agencies, in planning their actions, to consider alternatives to wetland sites and limit potential damage if an activity affecting a wetland cannot be avoided. The Order applies to:

- Acquisition, management, and disposition of federal lands and facilities construction and improvement projects which are undertaken, financed, or assisted by federal agencies;

- Federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities.

The procedures require the determination of whether or not the proposed project will be in or will affect wetlands. If so, a wetlands assessment must be prepared that describes the alternatives considered. The procedures include a requirement for public review of assessments.

#### *5. Migratory Bird Treaty Act (16 USC Section 703-712)*

The Migratory Bird Treaty Act (MBTA) makes it illegal for anyone to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. The migratory bird species protected by the MBTA are listed in 50 CFR 10.13. The USFWS has statutory authority and responsibility for enforcing the MBTA (16 U.S.C. 703-712). The MBTA implements Conventions between the United States and four countries (Canada, Mexico, Japan, and Russia) for the protection of migratory birds.

#### *6. Bald and Golden Eagle Protection Act*

The Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c), enacted in 1940, and amended several times since then, prohibits anyone, without a permit issued by the Secretary of the Interior, from "taking" bald eagles, including their parts, nests, or eggs. The Act provides criminal penalties for persons who "take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or

any manner, any bald eagle … [or any golden eagle], alive or dead, or any part, nest, or egg thereof." The Act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb." "Disturb" means: “to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior."

### B. State Regulations

#### *1. California Endangered Species Act (CESA)*

The California Endangered Species Act (CESA) states that all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation, will be protected or preserved. The California Department of Fish and Wildlife (CDFW) works with interested persons, agencies, and organizations to protect and preserve such sensitive resources and their habitats. CESA prohibits the take of any species of wildlife designated by the California Fish and Game Commission as endangered, threatened, or candidate species. CDFW may authorize the take of any such species if certain conditions are met.

Section 2081 subdivision (b) of the California Fish and Game Code (CFGC) allows CDFW to authorize take of species listed as endangered, threatened, candidate, or a rare plant, if that take is incidental to otherwise lawful activities and if certain conditions are met. These authorizations are commonly referred to as incidental take permits (ITPs).

If a species is listed by both the federal ESA and CESA, CFGC Section 2080.1 allows an applicant who has obtained a federal incidental take statement (federal Section 7 consultation) or a federal incidental take permit (federal Section 10(a)(1)(B)) to request that the Director of CDFW find the federal documents consistent with CESA. If the federal documents are found to be consistent with CESA, a consistency determination (CD) is issued and no further authorization or approval is necessary under CESA.

A Safe Harbor Agreement (SHA) authorizes incidental take of a species listed as endangered, threatened, candidate, or a rare plant, if implementation of the agreement is reasonably expected to provide a net conservation benefit to the species, among other provisions. SHAs are intended to encourage landowners to voluntarily manage their lands to benefit CESA-listed species. California SHAs are analogous to the federal safe harbor agreement program and CDFW has the authority to issue a consistency determination based on a federal safe harbor agreement.

#### *2. Natural Community Conservation Planning Act (NCCP)*

CDFW's Natural Community Conservation Planning (NCCP) program takes a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity. The NCCP program began in 1991 as a cooperative effort to protect habitats and species. It is broader in its orientation and objectives

than the California and Federal Endangered Species Acts, as these laws are designed to identify and protect individual species that have already declined in number significantly.

An NCCP identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. Working with landowners, environmental organizations, and other interested parties, a local agency oversees the numerous activities that compose the development of an NCCP. CDFW and the USFWS provide the necessary support, direction, and guidance to NCCP participants.

There are currently 17 approved NCCPs (includes 6 subarea plans) and more than 9 NCCPs in various stages of planning (includes 2 subarea plans), which together cover more than 8 million acres and will provide conservation for nearly 400 special status species and a wide diversity of natural community types throughout California.

### *3. California Fish and Game Code, Section 1600, et seq.*

CFGC section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or (3) deposit debris, waste or other materials that could pass into any river, stream, or lake. The CFGC indicates that "any river, stream or lake" includes those that are episodic (they are dry for periods of time) as well as those that are perennial (they flow year round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when it determines that the activity, as described in a complete LSA Notification, may substantially adversely affect existing fish or wildlife resources. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify a project that would eliminate or reduce harmful impacts to fish and wildlife resources. Before issuing an LSA Agreement, CDFW must comply with CEQA.

### *4. Native Plant Protection Act (NPPA) of 1977*

The Native Plant Protection Act (NPPA) was enacted in 1977 and allows the Fish and Game Commission to designate plants as rare or endangered. There are 64 species, subspecies, and varieties of plants that are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants, but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations.

### *5. Unlawful Take or Destruction of Nests or Eggs (CFGC Sections 3503.5-3513)*

Section 3503.5 of the CFGC specifically protects birds of prey, stating: “It is unlawful to take, possess, or destroy any . . . [birds-of-prey] or to take, possess, or destroy the nest or eggs of any such bird except as

otherwise provided by this code or any regulation adopted pursuant thereto." Section 3513 of the CFGC duplicates the federal protection of migratory birds, stating: "It is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act."

### C. Local Regulations

#### *1. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)*

The continued loss of habitat to new development and the cumbersome process of environmental review and habitat mitigation on a project-by-project basis led to preparation of the MSHCP. The MSHCP is a multi-jurisdictional accomplishment that provides a regional conservation solution to species and habitat issues. The primary intent of the MSHCP is to provide for the conservation of a range of plants and animals within natural communities characteristic of western Riverside County and in return, provide take coverage and mitigation for projects throughout the plan area to avoid the cost and delays of mitigating biological impacts on a project-by-project basis. (Riverside County, 2015, p. 4.8-49)

The MSHCP was adopted by Riverside County on June 17, 2003, and is a comprehensive, multijurisdictional Habitat Conservation Plan (HCP) pursuant to Section 10(a)(1)(B) of FESA, as well as an NCCP pursuant to the California Fish and Game Code. The USFWS issued a Biological Opinion and Federal ESA Section 10 permit for the MSHCP on June 22, 2004, and CDFW issued a Natural Community Conservation Planning (NCCP) Approval and Take Authorization on the same date. As long as adherence to the policies and requirements of the MSHCP is maintained, participants in the MSHCP, which include the County of Riverside and 18 cities, are allowed to authorize 'incidental take' of covered plant and wildlife species. (Riverside County, 2015, p. 4.8-49)

The MSHCP provides for the long-term survival of protected and sensitive species by designating a contiguous system of habitat to be added to existing public/quasi-public lands. The Plan includes an impact fee collected by the permittees and used in part to acquire these lands. Depending on the location of the private or public development project, certain biological studies are required for Plan compliance. These studies may identify the need for specific measures to avoid, minimize and reduce impacts to covered species and their habitat. (Riverside County, 2015, pp. 4.8-49 and 4.8-50)

The MSHCP defines two distinct consistency processes for development projects based on their location within the MSHCP's coverage area, with separate processes for projects located outside of Criteria Areas and those within a Criteria Area. Criteria Areas consist of 160-acre 'cells' with identified conservation objectives. (Riverside County, 2015, p. 4.8-50)

#### *2. Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP)*

The Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with USFWS and CDFW. The County of Riverside is a member agency of the RCHCA. The 30-year SKR HCP was designed to

acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens' kangaroo rat-occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens' kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied habitat in seven Core Reserves encompassing over 41,000 acres. (Riverside County, 2015, p. 4.8-52)

On May 3, 1996, the USFWS issued a permit to the Riverside County Habitat Conservation Agency to incidentally take the federally endangered Stephens' kangaroo rat (*Dipodomys stephensi*). Similarly, the CDFW issued a California Endangered Species Act Management Authorization for Implementation of the Stephens' kangaroo rat on May 6, 1996. As of 2015, more than $50 million had been dedicated to the establishment and management of a system of regional preserves designed to ensure the survival of SKR in the plan area. This effort resulted in the permanent conservation of approximately 50% of the SKR-occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is managed to ensure its continuing ability to support the species. Core reserves were deemed complete in December of 2003. (Riverside County, 2015, p. 4.8-52)

#### *3. Riverside County Ordinance No. 663 – SKR HCP Project Fee*

Riverside County Ordinance No. 663 requires development projects within the SKR HCP area to pay a development mitigation fee to establish the reserves, administer the plan and otherwise meet the requirements of the SKR HCP.

#### *4. Riverside County Oak Tree Management Guidelines*

In March 1993, the County of Riverside issued Oak Tree Management Guidelines to address the treatment of oak woodlands in areas where zoning and/or General Plan density restrictions allow the effective use of clustering. The guidelines are generally considered to be the most effective where minimum lot sizes are 2.5 acres or larger, or where oak woodlands are concentrated in a relatively small portion of a project site. The guidelines include recommendations for oak inventories, land use designs to cluster home sites in order to reduce impacts to oaks and mitigation measures for oak conservation.

#### *5. Riverside County Ordinance No. 559 – Regulating the Removal of Trees*

Riverside County Ordinance No. 559 regulates the removal of living native trees on parcels of property greater than one-half acre, located above 5,000 feet within the unincorporated area of Riverside County without first obtaining a permit to do so. The purpose of the ordinance is to ensure that the timberlands of Riverside County are protected and the ecological balance of such timberlands is preserved.

#### *6. Riverside County Ordinance No. 655 – Regulating Light Pollution*

Riverside County has adopted an ordinance regulating light pollution (Ordinance No. 655). Ordinance No. 655 is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce "skyglow" or

light pollution that affects day or nighttime views from the Mt. Palomar Observatory, which is located approximately 22.9 miles southeast of the Project site. As shown on SWAP Figure 6 (Southwest Area Plan Mt. Palomar Nighttime Lighting Policy Area), the Project site is located within the limits of "Zone B" of the Mt. Palomar Observatory Lighting Policy Area (Riverside County, 2021b, Figure 6). As such, the Project site is subject to the outdoor lighting policies and requirements specified by Riverside County Ordinance No. 655, which includes specific standards for lighting fixtures installed along public roadways and in other common areas and applies to all new development. Ordinance No. 655 encourages the use of low-pressure sodium lamps where possible, requires the shielding of all nonexempt outdoor lighting fixtures, specifies the hours of operation for non-exempt outdoor lighting fixtures, and regulates lighting fixtures used to illuminate an outdoor advertising display. (Riverside County, 1988)

### *7. Riverside County Ordinance No. 810 – Establishing an Interim Open Space Mitigation Fee*

This ordinance implements the Western Riverside County MSHCP and mitigates impacts of new development in western Riverside County. It establishes a development mitigation fee in order to help finance the acquisition of lands containing species protected by the MSHCP. By preserving these habitats and assessing a fee to develop in these open space areas, the ordinance helps to limit sprawl and encourage concentrated development, thereby reducing greenhouse gas emissions that would arise from trips between wider-flung land uses.

### *8. Riverside County Ordinance No. 847 – Regulating Noise*

Riverside County Ordinance No. 847 (Regulating Noise) addresses sound disturbances and sets various acceptable noise limits. Though not explicitly used to set CEQA thresholds, the ordinance does "establish countywide standards regulating noise," although a number of activities and uses are exempt from the regulations. The ordinance states that "no person shall create any sound…on any property that causes the exterior sound level on any other occupied property to exceed the sound level standards set forth in Table 1 [of Ordinance No. 847]." The ordinance also sets a series of additional "special sound source standards" that apply to motor vehicles, power tools and equipment, audio equipment, sound amplifying equipment and live music. Accordingly, this ordinance sets various limits for acceptable noise levels depending on the type of land use. For open space and residential areas, the acceptable nighttime threshold is much lower (45 dB Lmax) than for areas used for commercial and industrial areas (55 – 75 dB Lmax). Activities in any area that surpass applicable thresholds would be in violation of the ordinance and thus subject to sanction.

### *9. Riverside County Ordinance No. 915 – Regulating Outdoor Lighting*

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

### 4.4.3 Basis for Determining Significance

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

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

- Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

- Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

- Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

- Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

- Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

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

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

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

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

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

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

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

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

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

### 4.4.4 Impact Analysis

| | |
|---|---|
| **Threshold a.:** | **Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?** |

The Project area is subject to two separate habitat conservation plans: the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) and the Western Riverside County MSHCP. Each is discussed below.

#### A. Project Consistency with the SKR HCP

As previously noted, the SKR HCP was prepared under the direction of the RCHCA Board of Directors, in consultation with USFWS and CDFW. Riverside County is a member agency of the RCHCA. According to Figure S-1 of the SKR HCP, the Study Area is not located within or adjacent to any SKR core reserve areas. Additionally, the Project Applicant would be required to contribute fees towards the establishment and long-term maintenance of the SKR HCP core reserve pursuant to Riverside County Ordinance No. 663. The Project would not conflict with any provisions of the SKR HCP; thus, a less-than-significant impact would occur.

## B. Project Consistency with the MSHCP

Provided below is an evaluation of the Project's consistency with MSHCP Reserve assembly requirements, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs and Procedures).

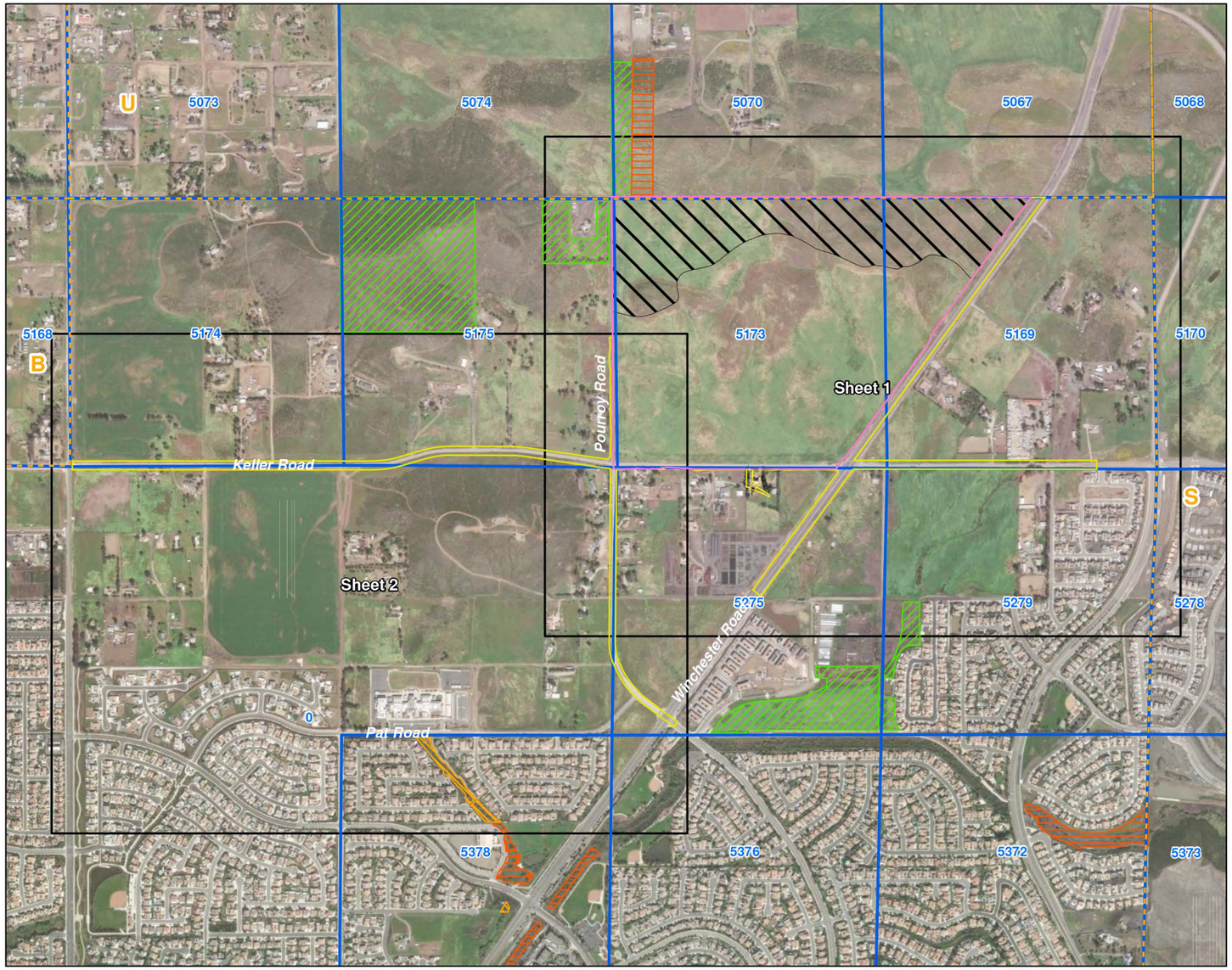
### *1. Project Relationship to MSHCP Reserve Assembly*

The onsite portion of the Study Area is located within the Southwest Area Plan Subunit 5 – French Valley/Lower Sedco Hills of the MSHCP and is included within the MSHCP Criteria Area. Portions of the offsite portions of the Study Area also are located within the Southwest Area Plan Subunit 5 – French Valley/Lower Sedco Hills of the MSHCP. (GLA, 2025, p. 90)

Specifically, the onsite portion of the Study Area falls within all or portions of Criteria Cells 5067, 5070, 5074, which are within Cell Group U, as well as Cells 5169, 5173, 5175, and 5275. The offsite portion of the Study Area also is partially located in the MSHCP Criteria Area within portions of Criteria Cells 5067, 5169, 5173, 5174, 5175, 5275, and 5279. The offsite portions of the Study Area also are within Cell Group U. Figure 4.4-8, *MSHCP Overlay Map*, shows the Study Area's relationship to the MSHCP Criteria Cells. Portions of the Project are located within the MSHCP Criteria Area Plant Species Survey Area (CAPSSA), Narrow Endemic Plant Species Survey Area (NEPSSA), and Burrowing Owl (Athene cunicularia) Survey Area, as shown oin Figure 4.4-9, *MSHCP Survey Area Map*. (GLA, 2025, p. 90)

Pursuant to the MSHCP, the following CAPSSA target species must be evaluated through habitat assessments and focused surveys (if suitable habitat is present): Parish's brittlescale (*Atriplex parishii*), Davidson's saltscale (*Atriplex serenana* var. *davidsonii*), thread-leaved brodiaea (*Brodiaea filifolia*), round-leaved filaree (*California macrophylla*), smooth tarplant (*Centromadia pungens ssp. laevis*), Coulter's goldfields (*Lasthenia glabrata ssp. coulteri*), little mousetail (*Myosurus minimus ssp. apus*), and mud nama (*Nama stenocarpum*). The Study Area also occurs within or portions of NEPSSA. Pursuant to the MSHCP, the following target species must be evaluated through habitat assessments and focused surveys (if suitable habitat is present): Munz's onion (*Allium munzii*), San Diego ambrosia (*Ambrosia pumila*), many-stemmed dudleya (*Dudleya multicaulis*), spreading navarretia (*Navarretia fossalis*), California Orcutt's grass (*Orcuttia californica*), and Wright's trichocoronis (*Trichocoronis wrightii* var. *wrightii*). The Project is not located within the MSHCP Invertebrate, Mammalian, or Amphibian Survey Areas, but is located within Proposed Constrained Linkage 17. (GLA, 2025, p. 90)

The onsite and offsite Project development footprint was determined to be consistent with the MSHCP as part of Joint Project Review (JPR) 09-12-14-01, dated February 25, 2010, and amended July 12, 2024. The JPR Findings referenced a development footprint of 227.9 acres. This JPR also required the conservation of 61.4 acres of land within the northern portion of the onsite Project. A HANS determination letter, HANS 1995, also was approved for the Project. This letter determined that the RCA concurred with the conservation documented in the JPR. The Project accommodates a total of 61.42 acres of land that would be designated

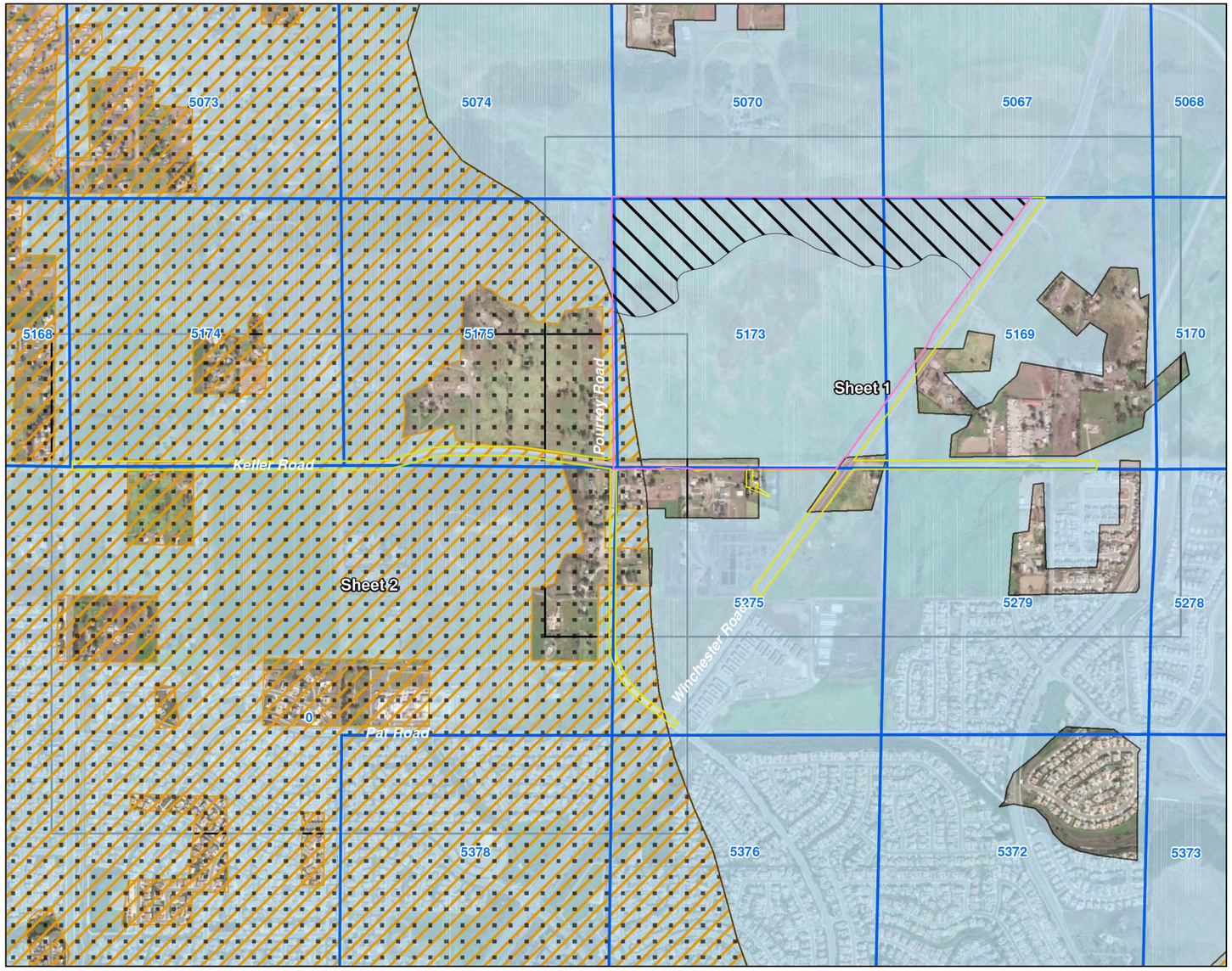



Source(s): Glenn Lukos Associates, 2025

Figure 4.4-8

Not to Scale

MSHCP Overlay Map




Source(s): Glenn Lukos Associates, 2025

Figure 4.4-9

Not to Scale

MSHCP Survey Area Map

for "Open Space – Conservation Habitat (OS-CH)" and would be dedicated to the Regional Conservation Authority (RCA) for long-term management. The Project's proposed 61.42 acres of open space is fully consistent with the amended JPR 09-12-14-01, and JPR 09-12-14-01 determined that the dedication of 61.42 acres would be adequate to meet the conservation criteria associated with Criteria Cells 5173 and 5169; thus, the Project as proposed would be fully consistent with the MSHCP Reserve Assembly requirements for the on-site portion of the Study Area, and impacts due to the Reserve Assembly requirements therefore would be less than significant.

The following roads are considered as "covered roads" under the MSCHP: Winchester Road and Keller Road. Pourroy Road and the proposed on-site Streets A-G are not considered covered roads under the MSHCP. Please refer to EIR subsection 3.5.3.C for a complete description of the Project's proposed roadway improvements. Each covered road for this project is described below. (GLA, 2025, p. 91)

- **Winchester Road/Highway 79 – Modified Expressway (184'-220' Total ROW)**: Winchester Road/Highway 79 is classified by the General Plan and Southwest Area Plan (SWAP) as an "Expressway" with an ultimate ROW width ranging from 184 to 220 feet. Project improvements to Winchester Road would result in a total right-of-way (ROW) of 184 feet. (GLA, 2025, p. 91)

  Winchester Road is a Planned Road described in MSHCP Volume 1, Section 7.3.5, with a covered ROW of approximately 184 feet wide. Improvements to Winchester Road as part of the Project would be limited to 184 feet in width, which is the MSHCP Covered ROW for Winchester Road. Table 7-4 (Planned Facilities) in the MSHCP states that Winchester Road would provide a habitat bridge overcrossing in the vicinity of Scott Road and SR 79 and a wildlife undercrossing north of Auld Road and SR-79. (GLA, 2025, p. 91)

  Two roadway cross-sections are proposed for Winchester Road as part of the Project, as previously shown on EIR Figure 3-4A. For the portion of Winchester Road from 0.5-mile north of Keller Road to the northern Project boundary, Winchester Road would be improved along the western edge to include up to 55 feet of curb-adjacent landscaped parkway and up to 20 feet of paving. For the portion of Winchester Road between Keller Road and 0.5-mile north of Keller Road, Winchester Road would be improved along the western edge to provide up to 29 feet of paving and a landscaped parkway along the western edge of the roadway up to 55 feet, which would include an 8-foot-wide curb-separated sidewalk. As part of the Project, approximately 0.3-acre (up to 10 feet in width) of ROW would be dedicated to the County of Riverside and/or Caltrans. (GLA, 2025, p. 91)

- **Keller Road – Secondary Highway (100'-112' ROW)**: As part of the Project, Keller Road would be slightly realigned to the north through the southern portions of the Project site in order to facilitate a 90-degree intersection with Winchester Road/Highway 79. As part of the Project, and as previously shown on EIR Figure 3-4A, a total of 100 feet of ROW would be dedicated along the portion of Keller Road that traverses the Project site, and this roadway would be improved to include 64 feet of paving (including a 12-foot-wide painted median) and 18-foot-wide parkways along each side of the roadway that would include 5-foot-wide curb-separated sidewalk along the southern side of the

roadway and a 10-foot-wide curb-separated meandering decomposed granite (d.g.) trail along the northern edge of the roadway. The ROW may increase to 112 feet and consist of 76 feet of paving (curb-to-curb) at the intersection of Keller Road and Winchester Road to accommodate turn lanes. (GLA, 2025, pp. 91-92)

It should be noted that the covered maximum allowable width of Keller Road is 100 feet but Project improvements would only grade up to 88 feet. The covered maximum allowable width of Winchester Road is 184 feet but Project improvements would only grade less than 184 feet and be within the existing ROW. All road and utility improvements would be within the covered maximum allowable width of these roads except for the northwest corner of Winchester Road and Keller Road where an additional 12 feet of width on Keller Road is necessary to allow for turning lanes on the eastbound approach to SR 79. This additional 12 feet in width is within the offsite Project and within the existing ROW. (GLA, 2025, p. 92)

Accordingly, based on the foregoing analysis, the Project's proposed improvements on and off site would be consistent with all applicable MSHCP Reserve Assembly requirements, and as such Project impacts due to a conflict with the MSHCP Reserve Assembly requirements would be less than significant (GLA, 2025, p. 94).

***2. Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (MSHCP Section 6.1.2)***

Due to proposed permanent impacts to approximately 0.39-acre of riverine and 0.05-acre of riparian areas (a total of 0.44-acre), a DBESP is required and has been prepared for the Project (refer to *EIR Technical Appendix C2*), as more fully discussed below under the analysis of Threshold e. The Project's previously-prepared DBESP was approved by the RCA and received final approval by the Wildlife Agencies on September 12, 2024. As documented in the Project's DBESP, the riverine areas generally are unvegetated and/or contain ruderal/non-native, non-riparian vegetation that is not suitable habitat for associated Riparian/Riverine sensitive species such as least Bell's vireo, southwestern willow flycatcher, or western yellow-billed cuckoo; therefore, no impact to these species would occur as part of the Project. The riparian area is sparsely vegetated and does not support the structure for sensitive species such as least Bell's vireo, southwestern willow flycatcher, or western yellow-billed cuckoo. (GLA, 2025, p. 92; GLA, 2024, p. 33)

The Project would permanently avoid a minimum of 61.42 acres of land within the northern portion of the site which includes all or portions of Drainages B, E, F, and G, totaling 0.19 acre out of the 0.63 acre of MSHCP riparian/riverine jurisdiction present within this 61.42-acre avoidance area. This represents avoidance of approximately 25% of the on-site streambeds. The avoidance of 61.42 acres represents avoidance of 31% of the overall property for conservation purposes. (GLA, 2024, p. 31)

There are no vernal pools, or vernal pool habitat associated with the Project site. No ponding was observed at the Project site during biological surveys, including those that occurred following periods of substantial rainfall. The site lacks the suitable topography (including localized depressions) to support prolonged inundation necessary to support fairy shrimp. In addition, the site is mapped as containing fine sand and sandy loam soils, which are generally not associated with vernal pools. Observations of the soils at the site showed a lack of clay soil components. Lastly, no plants were observed at the site that are associated with

vernal pools and similar habitats that experience prolonged inundation. As a result, no impact to vernal pools or vernal pool habitat would occur as a result of the Project. (GLA, 2025, p. 92; GLA, 2024, p. 33)

Nonetheless, the Project would result in unavoidable permanent impacts to 0.39-acre of MSHCP riverine areas and 0.05-acre of riparian area (for a total of 0.44 acre), which represents a conflict with MSHCP Section 6.1.2. This is evaluated as a significant impact for which mitigation would be required. (GLA, 2025, p. 92)

### *3. Protection of Narrow Endemic Plant Species (MSHCP Section 6.1.3)*

Volume I, Section 6.1.3 of the MSHCP requires that within identified NEPSSA, site-specific focused surveys for Narrow Endemic Plants Species will be required for all public and private projects where appropriate soils and habitat are present. The Project is located within the MSHCP CAPSSA designated Survey Area and NEPSSA designated Survey Area which targets the following species: Munz's onion, San Diego ambrosia, many-stemmed dudleya, spreading navarretia, California Orcutt's grass, Wright's trichocoronis, Parish's brittlescale, Davidson's saltscale, thread-leaved brodiaea, round-leaved filaree, smooth tarplant, Coulter's goldfields, little mousetail, and mud nama. These species were confirmed absent through focused plant surveys conducted in 2021 and 2025. As such, the proposed Project would be consistent with Volume I, Section 6.1.3 of the MSHCP, and impacts would be less than significant. (GLA, 2025, p. 92)

### *4. Guidelines Pertaining to the Urban/Wildland Interface (MSHCP Section 6.1.4)*

The MSHCP Urban/Wildland Interface Guidelines are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area. As the MSHCP Conservation Area is assembled, development is expected to occur adjacent to the Conservation Area. Future development in proximity to the MSHCP Conservation Area may result in edge effects with the potential to adversely affect biological resources within the Conservation Area. To minimize such edge effects, the guidelines shall be implemented in conjunction with review of individual public and private development projects in proximity to the MSHCP Conservation Area and address the following: (GLA, 2025, p. 93)

- Drainage;
- Toxics;
- Lighting;
- Noise;
- Invasive species;
- Barriers;
- Grading/Land Development.

Potential impacts due to a conflict with specific provisions of the UWIG are discussed below.

#### *Drainage*

Proposed Projects in proximity to the MSHCP Conservation Area are required to incorporate measures, including measures required through the National Pollutant Discharge Elimination System (NPDES) requirements, to ensure that the quantity and quality of runoff discharged to the MSHCP Conservation Area

is not altered in an adverse way when compared with existing conditions. In particular, measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into the MSHCP Conservation Area. Stormwater systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes within the MSHCP Conservation Area. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. Regular maintenance shall occur to ensure effective operations of runoff control systems. (GLA, 2025, pp. 78-79)

The Project's construction contractors would be required to develop a Stormwater Pollution Prevention Plan (SWPPP) to address runoff and water quality during construction. Following the completion of construction activities, areas proposed for development as part of the Project would consist of buildings and other impervious surfaces, along with areas proposed for ornamental landscaping. As discussed in more detail in EIR Subsection 4.10, *Hydrology and Water Quality*, the Project has been designed to detain runoff generated on the Project such that there would be no increase in developed storm flows as compared to existing drainage conditions. Additionally, the Project would be subject to compliance with a Project-specific Water Quality Management Plan (WQMP), which would specify measures that must be undertaken to ensure long-term maintenance of the water quality and detention features. As such, the Project would not in any way result in increased drainage or affect the water quality of the river to Warm Springs Creek or Murrieta Creek. Mandatory compliance with the future-required SWPPP during construction and the Project's WQMP under long-term operations would ensure that the Project does not conflict with the MSHCP provisions related to indirect drainage impacts. Accordingly, impacts would be less than significant. (GLA, 2025, p. 79)

***Toxics***

Land uses proposed in proximity to the MSHCP Conservation Area that use chemicals or generate bioproducts such as manure that are potentially toxic or may adversely affect wildlife species, habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Conservation Area. Measures such as those employed to address drainage issues shall be implemented. As noted above, near-term construction activities would be subject to compliance with a SWPPP and long-term operations would be subject to compliance with the Project's WQMP, both of which would preclude the discharge of toxics from the Project site that could adversely affect the MSHCP Conservation Area. Additionally, the Project's proposed land uses (residential and recreational) are not associated with the generation of substantial amounts of toxic substances, as more fully discussed in EIR Subsection 4.9, *Hazards and Hazardous Materials*. As such, the Project would not conflict with the MSHCP provisions related to toxics, and impacts would be less than significant. (GLA, 2025, p. 79)

***Lighting***

Night lighting is required to be directed away from the MSHCP Conservation Area to protect species within the MSHCP Conservation. Construction activities associated with the Project would be subject to compliance with Riverside County Ordinance No. 847, which prohibits construction activities that make loud noise from occurring between 6:00 p.m. and 6:00 a.m. during the months of June through September,

and between 6:00 p.m. and 7:00 a.m. during the months of October through May, and on Sundays and Federal holidays. With mandatory compliance with Ordinance No. 847, construction activities would not occur during nighttime hours, and impacts due to a conflict with the MSHCP UWIG provisions related to lighting would be less than significant. (GLA, 2025, p. 79)

Under long-term operating conditions, future development on site would be subject to compliance with Riverside County Ordinance No. 655 (Mt. Palomar Observatory), Riverside County Ordinance No. 915 (Regulating Outdoor Lighting), and the lighting requirements of the proposed Keller Crossing Specific Plan (SP 380A1). In particular, Section 5 of Riverside County Ordinance No. 915 requires that "[a]ll outdoor luminaires in shall be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way." Riverside County would review future implementing projects (i.e., plot plans, building permits, etc.) to ensure compliance with Riverside County Ordinance Nos. 655 and 915 and the lighting provisions of the proposed Keller Crossing Specific Plan, which would ensure that long-term operational lighting does not adversely affect the MSHCP Conservation Area. As such, under long-term conditions the Project would not conflict with the lighting provisions of the MSHCP, and impacts would be less than significant. (GLA, 2025, p. 79)

***Noise***

The MSHCP states that wildlife within the Conservation Area should not be subject to noise that would exceed residential noise standards. The MSHCP does not specify a noise level as the "residential standard," nor does the MSHCP differentiate between daytime and nighttime levels, and the standard varies depending on the Lead Agency jurisdiction.

As more fully discussed in EIR Subsection 4.13, *Noise*, a Project-specific Noise Impact Analysis (NIA) was prepared for the Project by Urban Crossroads, which is dated May 20, 2025, and is appended to this EIR as *Technical Appendix J* (Urban Crossroads, 2025d). The Project's NIA includes an analysis of construction and operational noise effects of the Project on surrounding areas adjacent to the Project. It should be noted that the NIA was designed to address residential noise effects on humans and was not designed in consideration of noise effects on wildlife; notwithstanding, the analysis herein relies on the residential noise standards in evaluating the potential significance of the Project's near-term construction and long-term operational noise impacts to the on-site conservation area.

As more fully discussed in EIR subsection 4.13.4.B, the threshold of significance for temporary construction-related noise relies the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual*, which specifies a construction-related noise threshold of 80 dBA Leq. For long-term operational-related noise, the MSHCP requires that wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards (i.e., 65 dBA CNEL).

As shown in EIR Table 4.13-6, *Construction Reference Noise Levels*, the loudest phase of construction would occur during site grading activities, which would generate noise levels of up to 84.2 dBA Leq at a distance of 50 feet from the source. Grading activities associated with the Project would occur up to the boundary of the proposed on-site conservation area, and as such there is a potential that Project

construction activities could expose the on-site open space conservation area to noise levels exceeding 80 dBA Leq. However, this threshold is not applicable to biological analyses, and instead the biological analysis must only consider the noise levels and their sources, the duration of the noise, and the time of day that the noise will occur. Construction by its very nature generates noise levels that would temporarily exceed those of ambient levels and typical project operational levels. However, construction activities would occur over a short duration and only during daytime hours. Furthermore, noise levels would vary throughout construction operations depending on the equipment being used and the portions of the Project site under active construction. In addition, the Project is not located in immediate proximity to riparian habitats that support sensitive riparian species such as the least Bell's vireo or southwestern willow flycatcher. Furthermore, as discussed below under the analysis of Thresholds b. and c., the Project would be required incorporate measures that would avoid and minimize impacts during the breeding season, including general nesting bird surveys with temporary setback buffers from any active nests and pre-construction burrowing owl surveys with temporary setback buffers from any occupied burrows[1]. Lastly, the aforementioned species are all designated as MSHCP Covered Species and therefore impacts (including indirect noise impacts) are covered by the MSHCP provided that projects are compliant with all applicable MSHCP requirements. Accordingly, Project indirect impacts due to noise that could affect the on-site conservation area would be less than significant. (GLA, 2025, p. 80)

Under long-term operating conditions, a majority of the Project would be developed with residential, recreational, and open space land uses, which would not have the potential for exposing on- or offsite conservation areas to noise levels exceeding 65 dBA CNEL. There are no components of the Project with the potential for operational noise impacts affecting the on-site open space conservation area. Accordingly, long-term operation of the Project would be consistent with the UWIG requirements related to noise, and as such impacts due to a conflict with the UWIG under long-term operating conditions would be less than significant. (GLA, 2025, p. 80)

***Invasive Species***

Projects adjacent to the MSHCP Conservation Area shall avoid the use of invasive plant species in landscaping, including invasive, non-native plant species listed in Volume I, Table 6-2 of the MSHCP. Future development on site would be subject to compliance with the proposed Keller Crossing Specific Plan (SP 380A1). Chapter 4 of proposed SP 380A1 addresses prohibited plants, and includes a listing of prohibited plant species within Table 4-3, *Prohibited Plant Species*. Table 4-3 was added to SP 380A1 to specifically address the list of prohibited plant species included in MSHCP Volume I, Table 6-2. Riverside County would review future implementing developments (i.e., plot plans, building permits) to ensure compliance with all applicable provisions of proposed SP 380A1, thereby ensuring that future landscaping on site does not include any of the prohibited plant species listed in Volume I, Table 6-2 of the MSHCP. Accordingly, indirect impacts due to invasive species would be less than significant. (GLA, 2025, p. 84)

[1] No burrowing owls were detected within the Project site during focused burrowing owl surveys. However, because the Project site contains potential habitat for burrowing owls, pre-construction surveys are required to prevent direct impacts to owls.

***Barriers***

Proposed land uses adjacent to the MSHCP Conservation Area shall incorporate barriers, where appropriate in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass or dumping in the MSHCP Conservation Area. Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage and/or other appropriate mechanisms. Proposed SP 380A1 includes a conceptual wall and fence plan, which requires the installation of a solid non-combustible wall and/or MSHCP wall/fence along the entire southern boundary of the open space conservation area on site, requires the installation of community steel fencing along the northern boundaries of Planning Areas 1 and 2 of SP 380A1, and requires either a block wall or decorative metal fence along the northern edge of Planning Ara 5 of SP 380A1. Riverside County would review future implementing developments (i.e., plot plans, building permits, etc.) to ensure compliance with all applicable provisions of proposed SP 380A1, including the requirement to provide fencing along the MSHCP Conservation Area in accordance with Figure 4-19 of proposed SP 380A1. As such, the Project would not conflict with the MSHCP requirements related to barriers, and impacts would be less than significant. (GLA, 2025, p. 84)

***Grading/Land Development***

The MSHCP states that manufactured slopes associated with development shall not extend into the MSHCP Conservation Area. Proposed SP 380A1 includes a conceptual grading plan, which was previously depicted on EIR Figure 3-10. In addition, proposed TTM 38163 includes a grading plan, as previously shown on EIR Figure 3-12. As shown on EIR Figure 3-10 and 3-12, no grading is proposed within areas proposed to be dedicated to the MSHCP Conservation Area. Riverside County would review future implementing developments (i.e., plot plans, building permits) to ensure compliance with all applicable provisions of proposed SP 380A1 and TTM 38163, including compliance with the conceptual grading plans associated with SP 380A1 and TTM 38163. As such, the Project would not conflict with the MSHCP requirements related to grading and land development, and impacts would be less than significant. (GLA, 2025, p. 85)

***5. Additional Survey Needs and Procedures***

Focused burrowing owl surveys were conducted for the onsite and offsite Project and no burrowing owl was detected; refer to Section 6.1 of the Project's BTR (*Technical Appendix C1*) regarding additional information pertaining to burrowing owl procedures. As the on and/or offsite Project occurs within CAPSSA and NEPSSA survey areas, focused plant surveys were conducted and no CAPSSA or NEPSSA target species were observed. The onsite and offsite Project does not occur within invertebrate, amphibian, and/or mammal survey areas; therefore, no invertebrate (Delhi Sands Flower-Loving Fly), Amphibian and/or Mammal surveys are required. (GLA, 2025, p. 93)

Although focused surveys determined that the burrowing owl is absent from the Study Area, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities. This is evaluated as a potentially significant impact for which mitigation, in the form of pre-construction burrowing owl surveys, would be required. (GLA, 2025, p. 93)

### 6. *Conclusion as to Project Consistency with the MSHCP*

As outlined above, the proposed Project would be consistent with the biological requirements of the MSHCP; specifically pertaining to the onsite and offsite Project's relationship to reserve assembly, Section 6.1.3 (Protection of Narrow Endemic Plant Species), and Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface). However, the Project would result in unavoidable permanent impacts to 0.39-acre of MSHCP riverine areas and 0.05-acre of riparian area (for a total of 0.44 acre), which represents a conflict with MSHCP Section 6.1.2. This is evaluated as a significant impact for which mitigation would be required. Additionally, although focused surveys determined that the burrowing owl is absent from the Study Area, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities. This is evaluated as a potentially significant impact due to a conflict with MSHCP Section 6.3.2 (Additional Survey Needs and Procedures), requiring mitigation in the form of pre-construction burrowing owl surveys.

| | |
|---|---|
| **Threshold b.:** | **Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?** |
| **Threshold c.:** | **Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?** |

The following discussion examines the potential impacts to plant and wildlife resources that would occur as a result of the proposed Project.

### A. Impacts to Sensitive Plant Species

The only sensitive plant species observed within the Study Area is the paniculate tarplant. Project implementation would result in direct impacts to this species. However, impacts to paniculate tarplant occurring as a result of the proposed Project would be less than significant under CEQA. The Study Area is heavily disturbed and the onsite population is relatively small. Therefore, given the low sensitivity of this species (CRPR 4.2), the proposed Project would not have a substantial adverse effect on the survivorship of paniculate tarplant. Additionally, while paniculate tarplant is classified as a rare plant by CNPS, it is not a federally or State-listed species. Furthermore, there are no survey or preservation requirements for this species pursuant to any resource agency or HCP, including the MSHCP. Accordingly, Project impacts to sensitive plant species would be less than significant. (GLA, 2025, p. 72)

### B. Impacts to Special-Status Animals

The proposed Project would result in the loss of habitat that supports special-status species including California horned lark, northern harrier, and American badger, and the loss of habitat that has the potential to support special-status species including coast horned lizard, coastal whiptail, orange-throat whiptail, red-diamond rattlesnake, bell's sage sparrow, burrowing owl, golden eagle, loggerhead shrike, southern

California rufous-crowned sparrow, and white-tailed kite. Impacts to these species may be significant under CEQA; however, all of these species except the American badger are covered under the MSHCP conservation goals and therefore, Project impacts to suitable habitat are addressed through consistency with, and participation in, the MSHCP. The analysis of Threshold a., above, demonstrates that with the incorporation of mitigation measures addressing potential impacts to the burrowing owl and unavoidable permanent impacts to 0.39-acre of MSHCP riverine areas and 0.05-acre of riparian area (for a total of 0.44 acre), the Project would be fully consistent with all applicable MSHCP requirements. Although the American badger is not a covered species, conserved habitat in the MSHCP Reserve in the vicinity of the Project site is expected to provide sufficient habitat to offset the loss of foraging habitat at the Project site. With implementation and coverage of the Project under the MSHCP conservation goals, and with mitigation to address potential impacts to the burrowing owl and MSHCP riparian/riverine areas, the Project would not have a significant impact on special-status species. Notwithstanding, because the Project would require mitigation for impacts to the burrowing owl and riparian/riverine areas in order to ensure compliance with the MSHCP, a significant impact is conservatively identified. (GLA, 2025, pp. 72-73)

In addition, the Study Area contains vegetation with the potential to support native nesting birds. The California Fish and Game Code prohibits mortality of native birds, including eggs. Thus, a significant impact could occur to nesting birds if grading or development were to occur during the nesting season (February 1 to August 31). (GLA, 2025, p. 88)

**Threshold d.: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Appendix G (d) of the State CEQA guidelines asks if a project is likely to "interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites." (GLA, 2025, p. 74)

The Project would conserve a minimum of 61.42 acres of land within the northern portions of the Project site to assist with the assembly of Proposed Constrained Linkage 17. This land dedication is consistent with MSHCP requirements and has been approved by the RCA through the JPR and HANS processes, as discussed under the analysis of Threshold a. (GLA, 2025, p. 74)

The Project's off-site improvement areas are limited to utility and/or road improvements within either existing or covered roads, or are utility improvements within these roads, which would have no further effect on wildlife movement than exists today. (GLA, 2025, p. 74)

Temporary disturbances to wildlife movement may occur during construction; however, these disturbances would be limited to daytime hours during construction activities and would not interfere significantly with wildlife movement on a landscape level. The Project's consistency with the MSHCP Reserve Assembly requirements would reduce impacts to wildlife movement to a level of less than significant under CEQA.

Additionally, no native wildlife nursery sites were observed within the Project area and therefore, no significant impacts to wildlife nursery sites would occur. (GLA, 2025, p. 74)

Based on the foregoing analysis, the proposed Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and impacts would be less than significant.

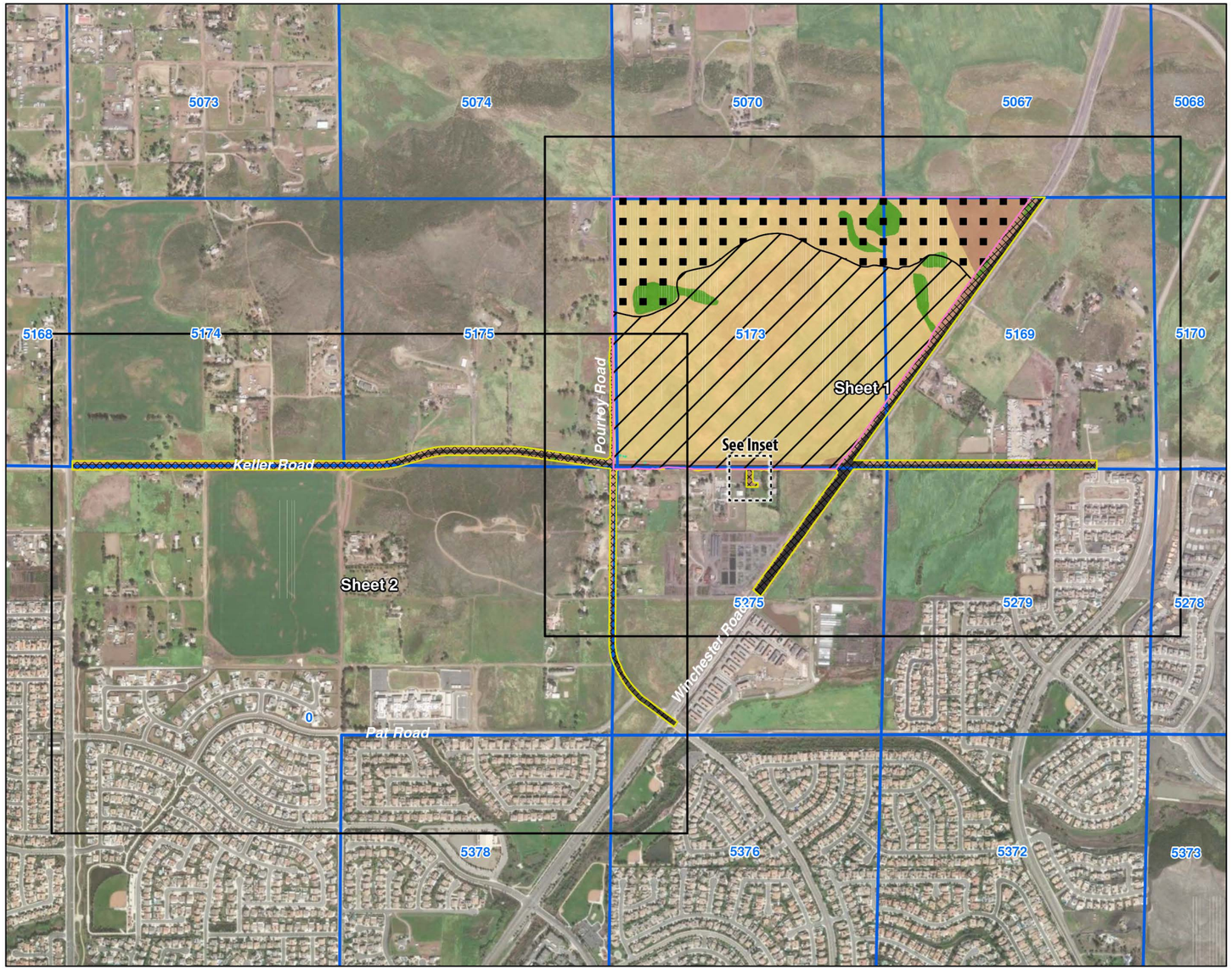
**Threshold e.: Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?**

As shown on Figure 4.4-10, *Project Impacts to Vegetation/Land Use Types*, and as summarized in Table 4.4-5, *Summary of Vegetation/Land Use Impacts*, the proposed Project would permanently impact 0.05-acre of Disturbed Mulefat Scrub. No temporary impacts to Disturbed Mulefat Scrub are expected during construction. Although this is not considered a sensitive plant community, it has components similar to the Southern Riparian Scrub plant community (Classified as G3-Vunerable by the CNDDB). The loss of mulefat/riparian habitat must be mitigated pursuant to Volume I, Section 6.1.2 of the MSHCP; thus, Project impacts to 0.05-acre of Disturbed Mulefat Scrub represents a potentially significant impact of the proposed Project for which mitigation would be required. None of the other vegetation communities to be impacted by the onsite and offsite Project are considered as sensitive communities under CEQA. (GLA, 2025, p. 73; GLA, 2026, pp. 36-37)

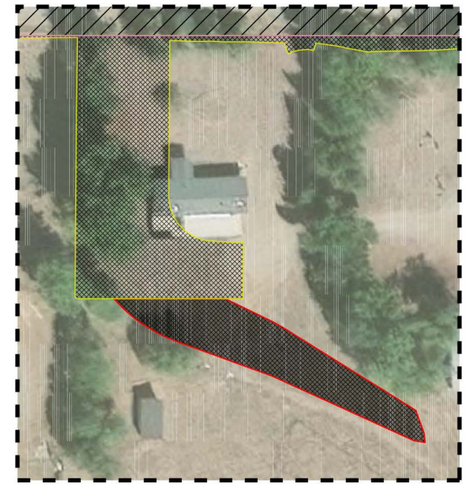
**Table 4.4-5 Summary of Vegetation/Land Use Impacts**

| Vegetation/Land Use Type | Inside Criteria Cell | | Outside Criteria Cell | | Total Impacts (acres) | Proposed MSHCP Conservation Areas (acres) |
|---|---|---|---|---|---|---|
| | Onsite Impacts (acres) | Offsite Impacts (acres) | Onsite Impacts (acres) | Offsite Impacts (acres) | | |
| Agriculture | 127.44 | 0 | 0.00 | 0.00 | 127.44 | 47.79 |
| Developed | 1.44 | 13.18 | 0.00 | 1.04 | 15.58 | 0.00 |
| Disturbed | 2.67 | 13.30 | 0.02 | 3.65 | 19.64 | 7.80 |
| Disturbed Buckwheat Scrub | 2.81 | 0.39 | 0.00 | 0.07 | 3.27 | 5.83 |
| Ornamental | 0.08 | 0.34 | 0.00 | 0.13 | 0.55 | 0.00 |
| Disturbed Mulefat Scrub | 0.05 | 0.00 | 0.00 | 0.00 | 0.05 | 0.00 |
| **Total:** | **134.50** | **27.21** | **0.02** | **4.89** | **166.60** | **61.42** |

*Sum of individual parts may not equal sum total due to rounding error.
(GLA, 2025, Table 5-1; GLA, 2026, pp. 36-37)




Inset



- Project – Offsite (Addendum Area)
- Project - Onsite
- Project - Offsite
- Project Footprint - Onsite
- Project Footprint - Offsite
- MSHCP Conservation
- Criteria Cells
- Agriculture
- Developed
- Disturbed
- Disturbed Buckwheat Scrub
- Disturbed Mulefat Scrub
- Ornamental

Source(s): Glenn Lukos Associates, 2025

Figure 4.4-10

Not to Scale

Project Impacts to Vegetation/Land Use Types

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

The Project and off-site improvement areas do not contain any State- or federally-protected wetlands; therefore no impacts to state or federally protected wetlands would occur as a result of the Project (GLA, 2025, p. 74).

Although the Project site and off-site improvement areas do not contain any State- or federally-protected wetlands, implementation of the Project would result in direct impacts to areas considered jurisdictional by the San Diego RWQCB and/or the CDFW. Project impacts to jurisdictional waters are discussed below.

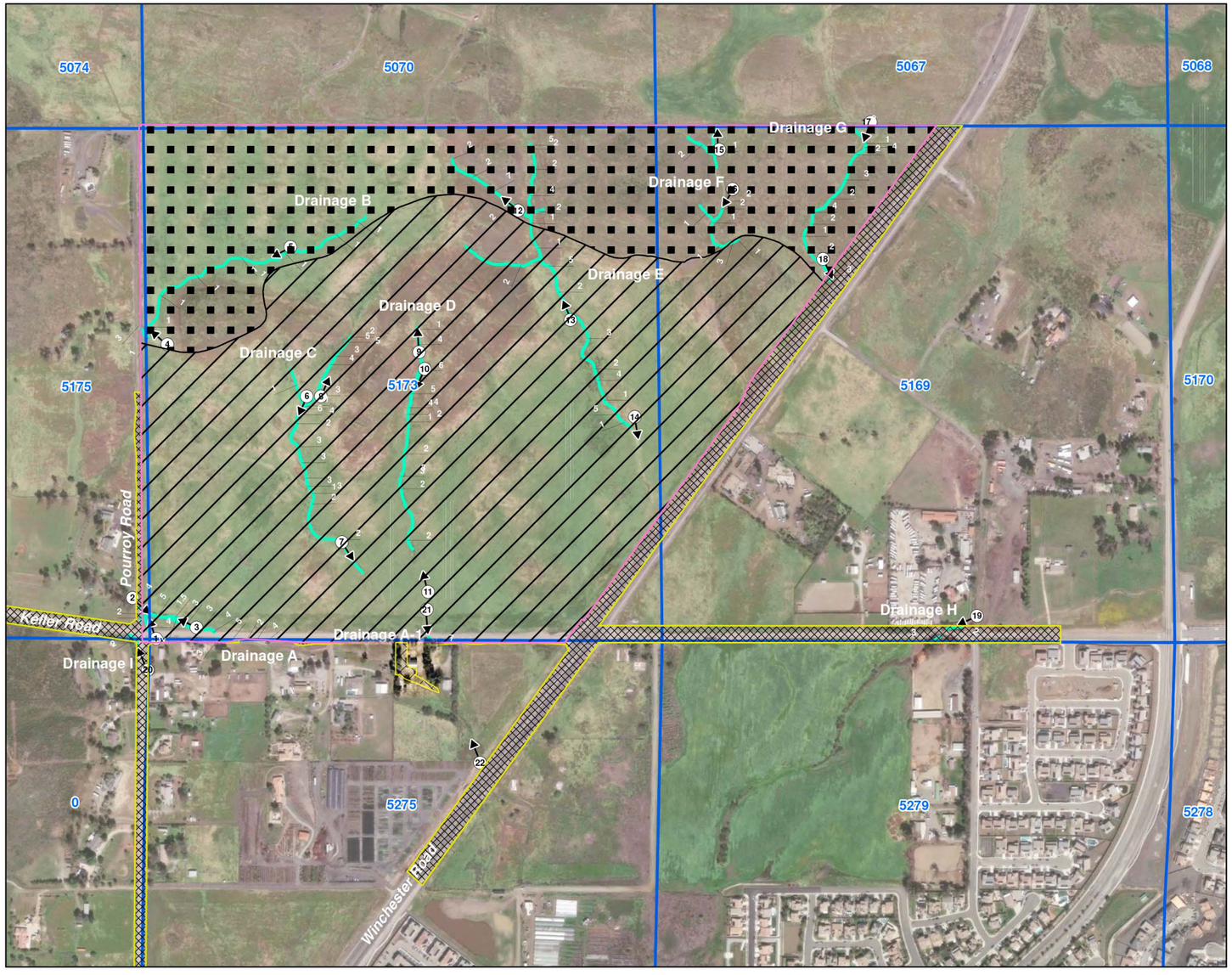
***Project Impacts to RWQCB Jurisdictional Areas***

As shown on Figure 4.4-11 and Figure 4.4-12, *RWQCB Jurisdictional Resources Impact Map*, and as summarized in Table 4.4-6, *Summary of Potential RWQCB Jurisdictional Impacts*, implementation of the proposed Project would result in direct impacts to a total of 0.36-acre ( 5,766 linear feet) of State waters under the jurisdiction of the San Diego RWQCB. No temporary impacts to Regional Board jurisdiction would occur with implementation of the proposed Project. Project impacts to 0.36-acre of RWQCB non-wetland waters represents a potentially significant impact of the proposed Project for which mitigation would be required. (GLA, 2025, p. 75; GLA, 2026, pp. 36-37)

**Table 4.4-6 Summary of Potential RWQCB Jurisdictional Impacts**

| Drainage Name | Regional Board Impacts Non-Wetland Waters (Acres) | Regional Board Impacts State Wetland Waters (Acres) | Total Regional Board Impacts (Acres) | Total Regional Board Impacts (Linear Feet) |
|---|---|---|---|---|
| **Waters of the State** | | | | |
| Drainage A | 0.07 | 0 | 0.07 | 808 |
| Drainage A-1 | 0.004 | 0 | 0.004 | 31 |
| Drainage B | 0 | 0 | 0 | 0 |
| Drainage C | 0.10 | 0 | 0.10 | 1,725 |
| Drainage D | 0.08 | 0 | 0.08 | 1,205 |
| Drainage E | 0.09 | 0 | 0.09 | 1,703 |
| Drainage F | 0.002 | 0 | 0.002 | 46 |
| Drainage G | 0.001 | 0 | 0.001 | 32 |
| Drainage H | 0.01 | 0 | 0.01 | 139 |
| Drainage I | 0.004 | 0 | 0.004 | 77 |
| **Total:** | **0.36** | **0** | **0.36** | **5,766** |

*Sum of individual parts may not equal sum total due to rounding error.
(GLA, 2025, Table 5-2)

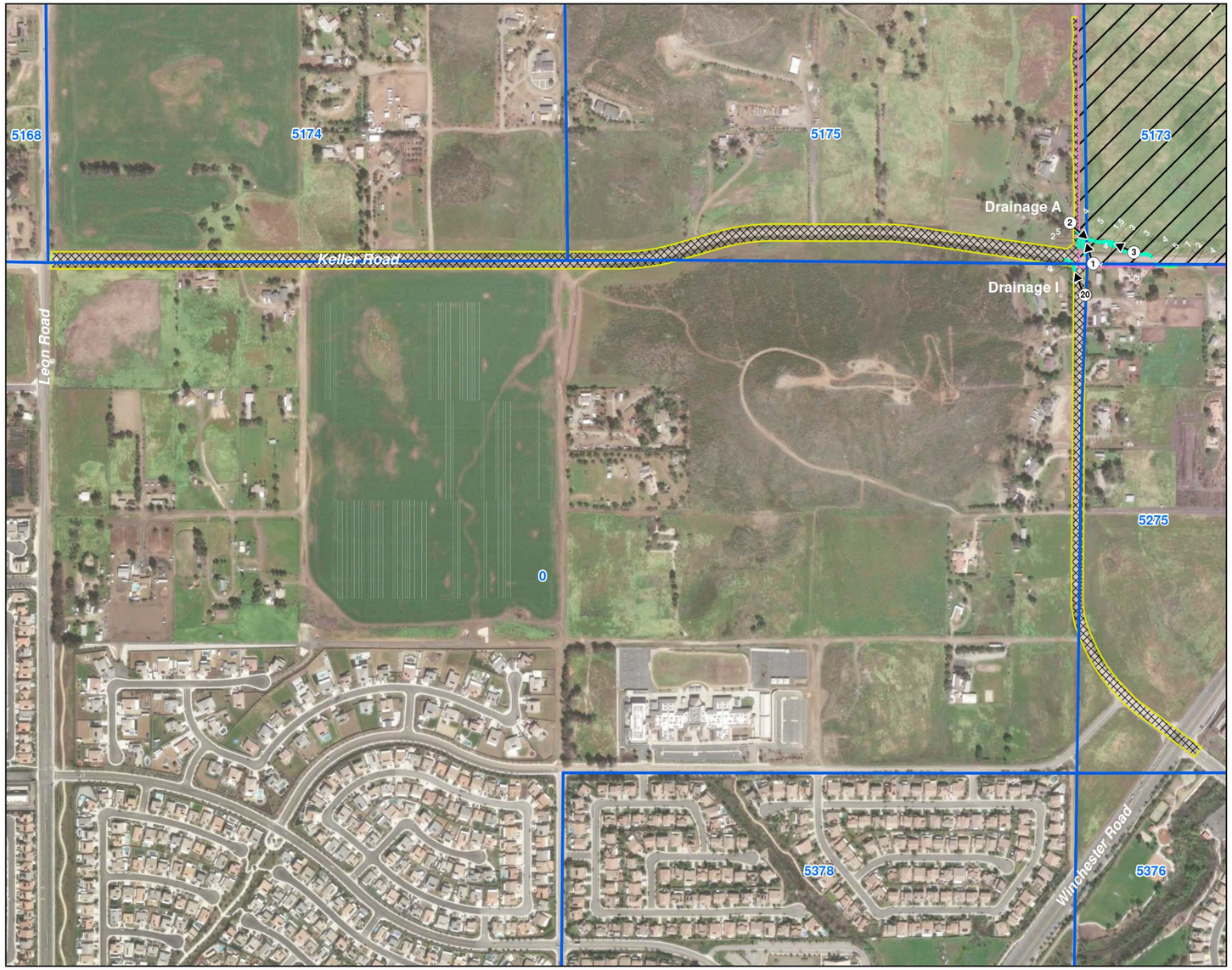



Source(s): Glenn Lukos Associates, 2025

Figure 4.4-11

Not to Scale

RWQCB Jurisdictional Resources Impact Map (1 of 2)




Source(s): Glenn Lukos Associates, 2025

Figure 4.4-12

Not to Scale

RWQCB Jurisdictional Resources Impact Map (2 of 2)

***Project Impacts to CDFW Jurisdictional Areas***

As shown on Figure 4.4-13, *CDFW Jurisdictional Resources Impact Map*, and as summarized in Table 4.4-7, *Summary of Potential CDFW Jurisdictional Impacts*, implementation of the proposed Project would result in permanent impacts to 0.44-acre of CDFW jurisdiction (composed of 0.39-acre non-riparian streambed and 0.05-acre riparian streambed). No temporary impacts to CDFW jurisdiction would occur with implementation of the Project. Project impacts to 0.44-acre of CDFW jurisdiction (0.39-acre non-riparian streambed and 0.05-acre riparian streambed) represents a potentially significant impact of the proposed Project for which mitigation would be required. (GLA, 2025, p. 76; GLA, 2026, pp. 36-37)

**Table 4.4-7 Summary of Potential CDFW Jurisdictional Impacts**

| Drainage Name | CDFW Impacts Non- Riparian Stream (Acres) | CDFW Impacts Riparian Stream (Acres) | Total CDFW Impacts (Acres) | Total CDFW Impacts (Linear Feet) |
|---|---|---|---|---|
| Drainage A | 0.08 | 0.05 | 0.13 | 783 |
| Drainage A-1 | 0.005 | 0 | 0.005 | 31 |
| Drainage B | 0 | 0 | 0 | 0 |
| Drainage C | 0.10 | 0 | 0.10 | 1,725 |
| Drainage D | 0.09 | 0 | 0.09 | 1,205 |
| Drainage E | 0.10 | 0 | 0.10 | 1,703 |
| Drainage F | 0.002 | 0 | 0.002 | 46 |
| Drainage G | 0.001 | 0 | 0.001 | 32 |
| Drainage H | 0.01 | 0 | 0.01 | 139 |
| Drainage I | 0.004 | 0 | 0.004 | 77 |
| **Total** | **0.39** | **0.05** | **0.44** | **5,766** |

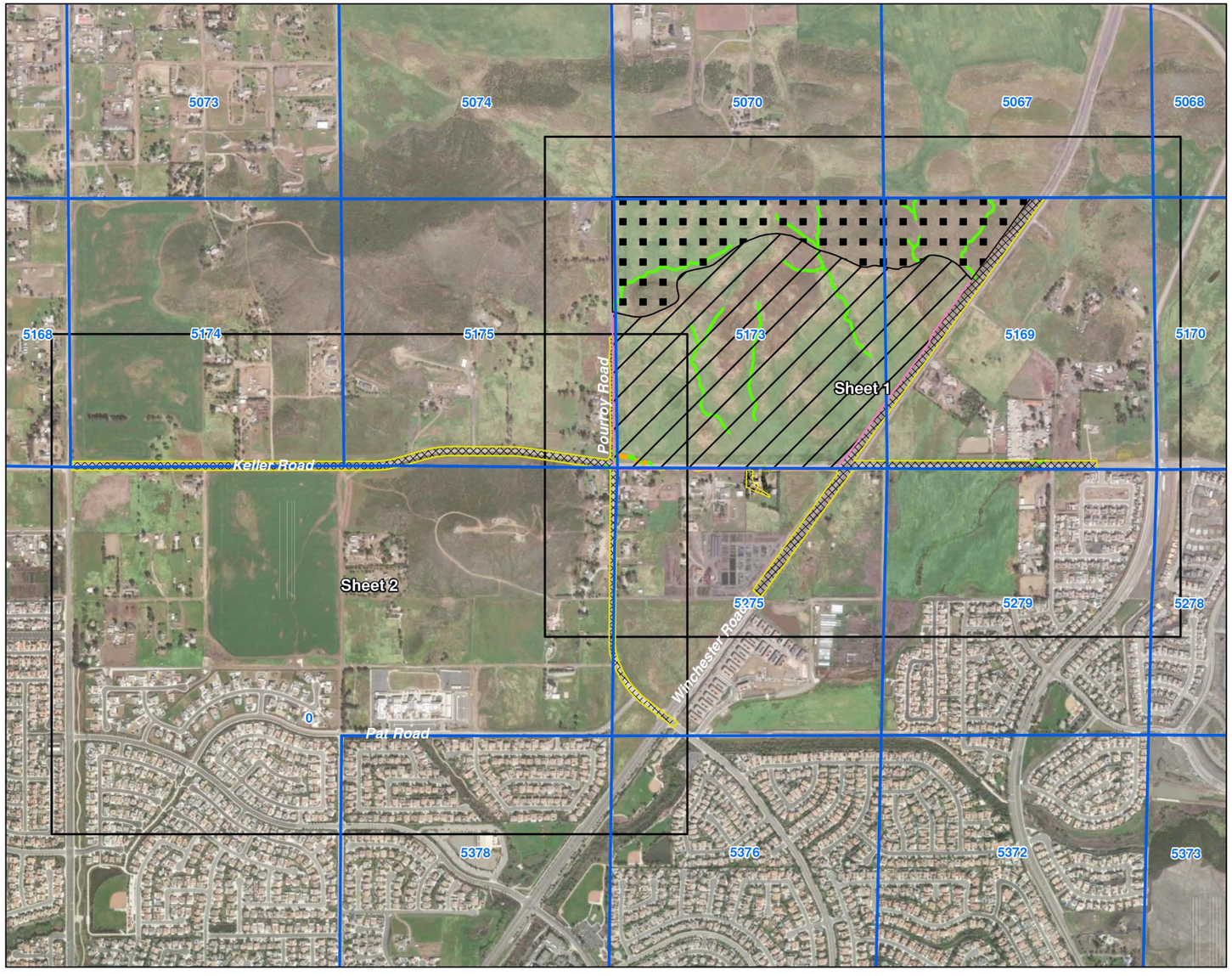
*Sum of individual parts may not equal sum total due to rounding error.
(GLA, 2025, Table 5-3)

***Project Impacts to MSHCP Riparian/Riverine Areas***

As shown on Figure 4.4-14 and Figure 4.4-15, *MSHCP Riparian/Riverine Impact Map*, and as summarized in Table 4.4-8, *Summary of Potential MSHCP Jurisdictional Impacts*, Project implementation would result in direct impacts to a total of 0.44-acre of MSHCP jurisdiction (0.39-acre non-riparian streambed and 0.05-acre riparian streambed). No temporary impacts to MSHCP jurisdiction are expected. Project impacts to 0.44-acre of MSHCP jurisdiction (including impacts to 0.39-acre non-riparian streambed and 0.05-acre riparian streambed) represents a potentially significant impact of the proposed Project for which mitigation would be required. (GLA, 2025, p. 76; GLA, 2026, pp. 36-37)

**Threshold g: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

Aside from the SKR HCP and the MSHCP, which are addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). As

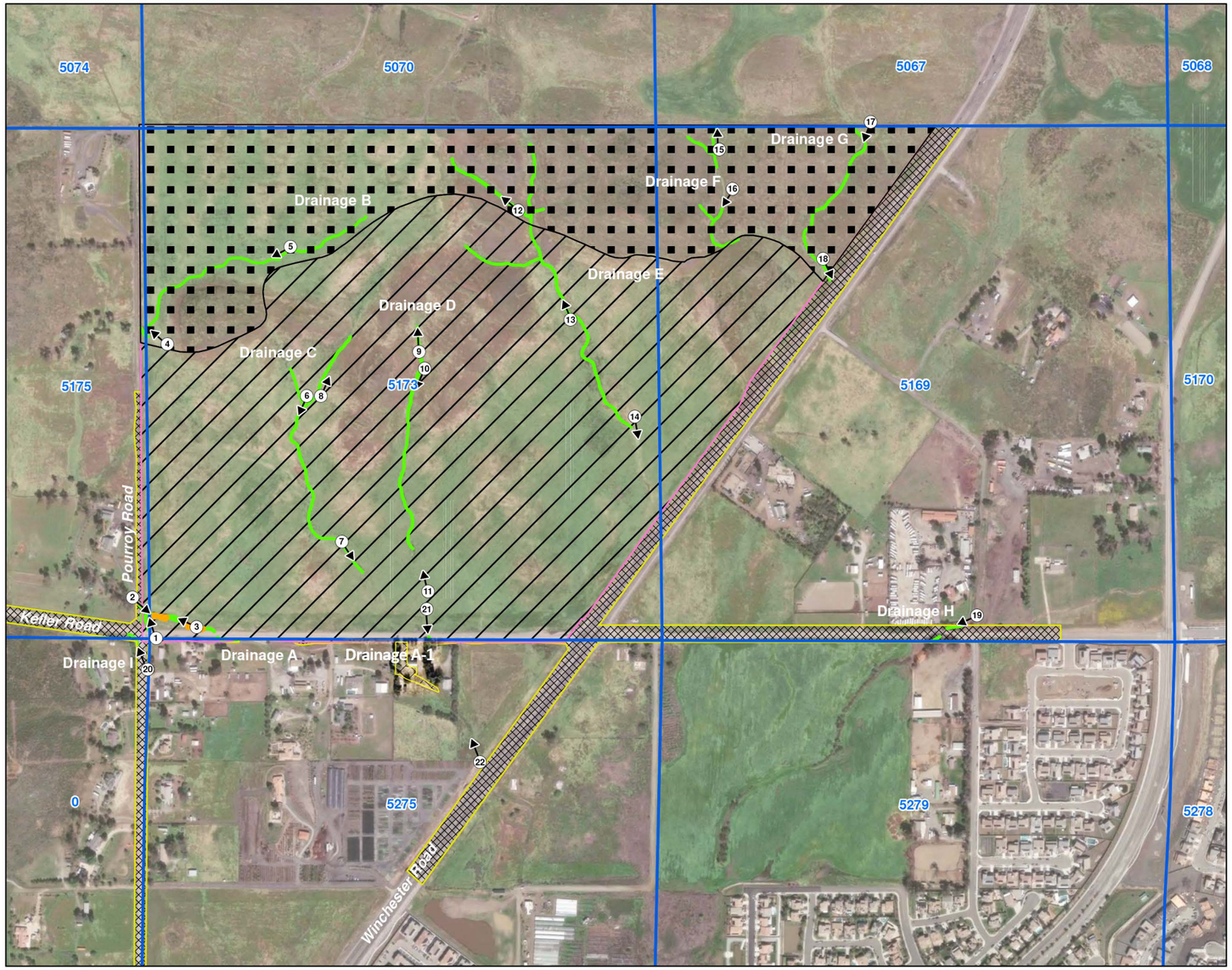



Source(s): Glenn Lukos Associates, 2025

Figure 4.4-13

Not to Scale

CDFW Jurisdictional Resources Impact Map



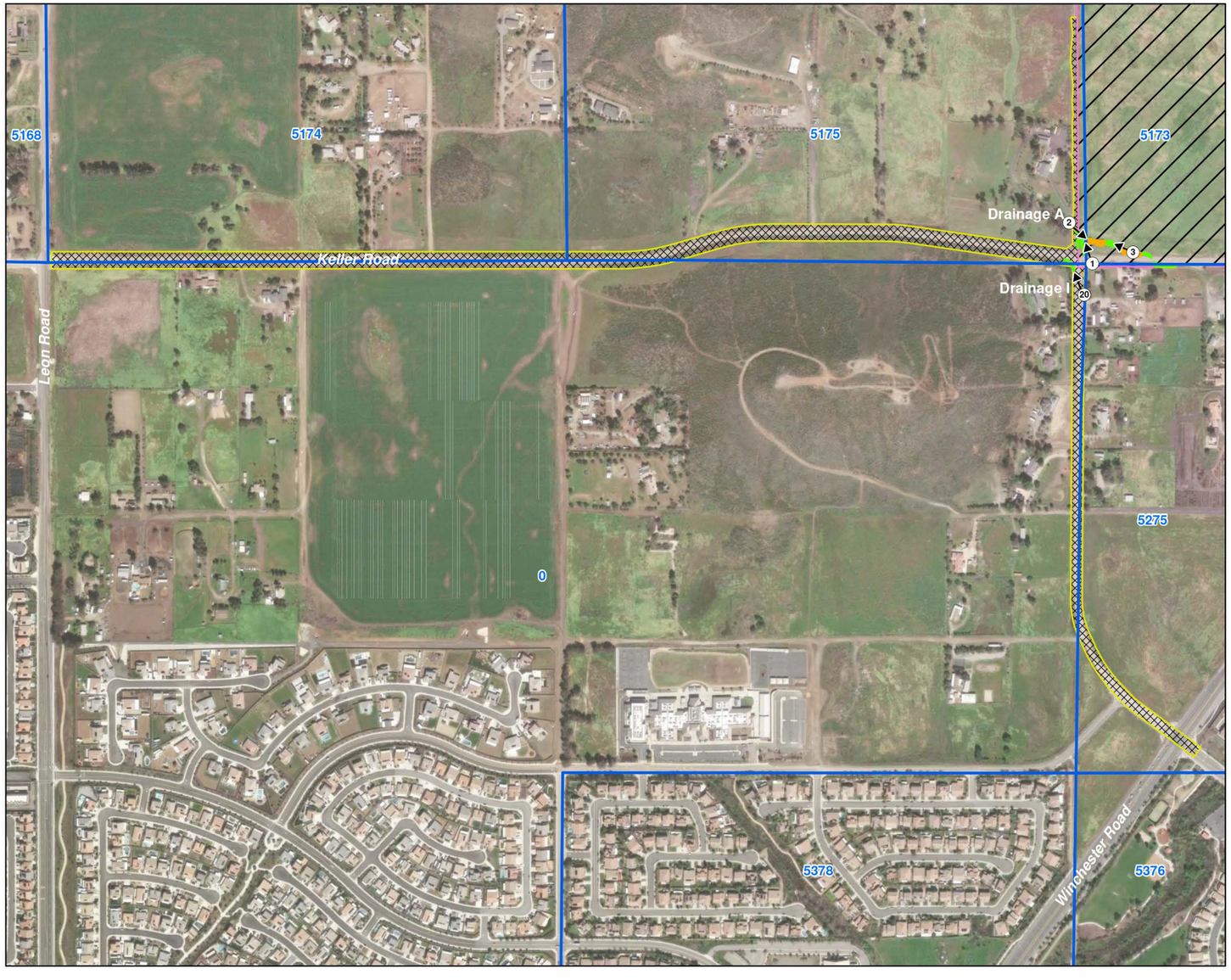

Project - Onsite
Project - Offsite
Project Footprint - Onsite
Project Footprint - Offsite
MSHCP Conservation
Criteria Cells
MSHCP Riverine
MSHCP Riparian
Photo Location

Source(s): Glenn Lukos Associates, 2025

Figure 4.4-14

Not to Scale

MSHCP Riparian/Riverine Impact Map (1 of 2)




Source(s): Glenn Lukos Associates, 2025

Figure 4.4-15

Not to Scale

MSHCP Riparian/Riverine Impact Map (2 of 2)

**Table 4.4-8 Summary of Potential MSHCP Jurisdictional Impacts**

| Drainage Name | Inside Criteria Cell | | | | Outside Criteria Cell | | | | Total MSHCP Impacts (acres) |
|---|---|---|---|---|---|---|---|---|---|
| | Onsite | | Offsite | | Onsite | | Offsite | | |
| | MSHCP Impacts Riverine Stream (acres) | MSHCP Impacts Riparian Stream (acres) | MSHCP Impacts Riverine Stream (acres) | MSHCP Impacts Riparian Stream (acres) | MSHCP Impacts Riverine Stream (acres) | MSHCP Impacts Riparian Stream (acres) | MSHCP Impacts Riverine Stream (acres) | MSHCP Impacts Riparian Stream (acres) | |
| Drainage A | 0.06 | 0.05 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.13 |
| Drainage A-1 | 0.004 | 0.00 | 0.001 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.005 |
| Drainage B | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0 |
| Drainage C | 0.10 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.10 |
| Drainage D | 0.09 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.09 |
| Drainage E | 0.10 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.10 |
| Drainage F | 0.002 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.002 |
| Drainage G | 0.00 | 0.00 | 0.001 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.001 |
| Drainage H | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 |
| Drainage I | 0.00 | 0.00 | 0.002 | 0.00 | 0.00 | 0.00 | 0.002 | 0.00 | 0.004 |
| **Total:** | **0.36** | **0.05** | **0.02** | **0.00** | **0.00** | **0.00** | **<0.01** | **0.00** | **0.44** |

*Sum of individual parts may not equal sum total due to rounding error.
(GLA, 2025, Table 5-4)

previously indicated in Table 4.4-1, there are no oak trees or vegetation communities containing oak trees within the Study Area. As such, the Project has no potential to result in a conflict with the County's Oak Tree Management Guidelines. Additionally, Riverside County Ordinance No. 559 applies to properties located above 5,000 feet amsl in elevation, while the maximum elevation at the Project site is approximately 1,587 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project. Accordingly, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur.

### 4.4.5 Cumulative Impact Analysis

The cumulative impact analysis considers development of the Project in conjunction with other development projects located within the purview of the Western Riverside County MSHCP. This study area for cumulatively-considerable impacts to biological resources is appropriate because the MSHCP encompasses a large area surrounding the Project site, and provides for the long-term protection of sensitive plant, animal, and plant communities throughout the MSHCP area. Additionally, most cumulative development projects within the Project vicinity would be subject to the provisions of the MSHCP, and the general range of habitats, species, climate, etc. are fairly consistent throughout the MSHCP.

As discussed under the analysis of Threshold a., the Project would be subject to payment of fees pursuant to Riverside County Ordinance No. 663, which would ensure Project consistency with the SKR HCP. As other cumulative developments also would be subject to compliance with the SKR HCP, Project impacts due to a conflict with the SKR HCP would be less than significant on a cumulatively-considerable basis. The Project Applicant would dedicate 61.42 acres of land within the northern portions of the Project site to the MSHCP reserve system, which was previously determined to be consistent with the MSHCP Reserve Assembly requirements that apply to the Project site. The Project's off-site improvements within MSHCP criteria cells would occur within areas that are considered "covered roads" by the MSHCP. Thus, the Project and the Project's off-site improvements would not conflict with the MSHCP Reserve Assembly requirements. The Project would result in unavoidable permanent impacts to 0.39-acre of MSHCP riverine areas and 0.05-acre of riparian area (for a total of 0.44-acre), which represents a conflict with MSHCP Section 6.1.2. As other cumulative developments have the potential to result in impacts to riparian/riverine habitat, Project impacts to 0.44-acre of riparian/riverine areas would be cumulatively considerable. Focused surveys confirmed that MSHCP target NEPSSA and CAPSSA species are absent from the Study Area; thus, Project impacts to narrow endemic plants would be less than significant. The Project would be consistent with the MSHCP UWIG requirements related to drainage, toxics, lighting, noise, invasive species, barriers, and grading/land development; thus, because other cumulative developments also would be required to comply with the UWIG requirements of the MSHCP, impacts due to a conflict with the UWIG would be less than significant on a cumulatively-considerable basis. Although focused surveys determined that the burrowing owl is absent from the Study Area, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities. Other cumulative developments would similarly have the potential to result in impacts to the burrowing owl; thus, Project impacts to the burrowing owl represent a cumulatively-considerable impact prior to mitigation.

As discussed under the analysis of Thresholds b. and c., the Project would not result in less-than-significant impacts to special-status plants (i.e., the paniculate tarplant), and cumulatively-considerable impacts would not occur. Although the Project would result in less-than-significant impacts to most special status animals observed within the Study Area, there is a potential that the site may be occupied by nesting birds prior to the commencement of construction, resulting in potentially significant impacts if construction activities were to occur during the nesting season (February 1 through August 31). Additionally, although not observed during focus surveys within the Study Area, the Study Area nonetheless contains suitable habitat for burrowing owls. MSHCP Objective 6 for burrowing owls requires that pre-construction surveys occur prior to site grading. Thus, the Project has the potential to result in impacts to the burrowing owl. As other cumulative developments within the region also have the potential to result in impacts to nesting birds and the burrowing owl, the Project's impacts would be cumulatively considerable.

As indicated under the analysis of Threshold d., the Study Area does not contain any wildlife nursery sites; thus, cumulatively-considerable impacts to wildlife nursery sites would not occur. The Project Applicant is proposing to conserve a minimum of 61.42 acres of land within the northern portions of the Project site to assist with the assembly of MSHCP Proposed Constrained Linkage 17. This land dedication is consistent with MSHCP requirements and has been approved by the RCA through the JPR and HANS processes. As such, the Project would contribute to the establishment of Proposed Constrained Linkage 17, thereby providing for localized wildlife movement in the local area. Other cumulative developments would similarly be required to comply with the MSHCP, including the MSHCP Reserve Assembly requirements. Accordingly, Project impacts to wildlife movement corridors would be less-than-cumulatively considerable.

As discussed under the analysis of Threshold e., the proposed Project would permanently impact 0.05-acre of Disturbed Mulefat Scrub. Although this is not considered a sensitive plant community, it has components similar to the Southern Riparian Scrub plant community (Classified as G3-Vunerable by the CNDDB) during construction. The loss of mulefat/riparian habitat must be mitigated pursuant to Volume I, Section 6.1.2 of the MSHCP. Accordingly, Project impacts to 0.05-acre of Disturbed Mulefat Scrub represent a cumulatively-considerable impact for which mitigation would be required. None of the other vegetation communities to be impacted by Project are considered sensitive vegetation communities under CEQA, and impacts to these vegetation communities would be less than significant on a cumulatively-considerable basis.

As indicated in the analysis of Threshold f., the Project would impact 0.36-acre of Waters of the State under Regional Board jurisdiction, a total of 0.44-acre of CDFW jurisdiction, and a total of 0.44-acre of MSHCP Riparian/Riverine areas (including impacts to 0.39-acre non-riparian streambed and 0.05-acre riparian streambed) As other cumulative developments within the region also have the potential to impact Regional Board jurisdictional areas, CDFW jurisdictional areas, and/or MSHCP Riparian/Riverine areas, the Project's impacts to jurisdictional areas would be cumulatively considerable.

As indicated under the analysis of Threshold g., aside from the SKR HCP and the MSHCP (which are addressed under the analysis of Threshold a.), the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). However, the Study Area does not contain any oak

trees that would be subject to the County's Oak Tree Management Guidelines, and Riverside County Ordinance No. 559 applies only to properties located above 5,000 feet amsl. Accordingly, Project impacts due to a conflict with local policies or ordinances protecting biological resources would be less-than-cumulatively considerable.

### 4.4.6 Significance of Impacts Before Mitigation

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The Project would not conflict with the SKR HCP, and impacts would be less than significant. The Project would not result in a conflict with the MSHCP Reserve Assembly requirements, and the Project's off-site improvements that occur within MSHCP Criteria Cells all occur within covered roadways under the MSHCP. Project impacts to 0.39-acre of MSHCP riverine and 0.05-acre of riparian areas (a total of 0.44-acre) would represent a potential conflict with Section 6.1.2 of the MSHCP, and impacts would therefore be significant. The Project would not result in impacts to narrow endemic plants, and thus would be consistent with Volume I, Section 6.1.3 of the MSHCP. The Project also would be consistent with the MSHCP UWIG requirements related to drainage, toxics, lighting, noise, invasive species, barriers, and grading/land development. Although the Project would not result in impacts to CAPSSA or NEPSSA plant species, and the Study Area does not occur within invertebrate, amphibian, and/or mammal survey areas, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities. This is evaluated as a potentially significant impact for which mitigation, in the form of pre-construction burrowing owl surveys, would be required. Project impacts due to a potential conflict with the MSHCP would be significant on both a direct and cumulatively-considerable basis.

Thresholds b. and c.: Significant Direct and Cumulatively-Considerable Impact. Although the proposed Project would result in impacts to paniculate tarplant, impacts would be less than significant due to the low sensitivity of this species (CNPS 4.2) and because the portions of the Project site proposed for development are heavily disturbed and the onsite population of paniculate tarplant is relatively small. With implementation and coverage of the Project under the MSHCP conservation goals, the Project would not have a significant impact on special-status animal species and impacts would be less than significant. However, the Study Area contains vegetation with the potential to support native nesting birds. The California Fish and Game Code prohibits mortality of native birds, including eggs. Thus, a significant impact could occur to nesting birds if grading or development were to occur during the nesting season (February 1 to August 31). Additionally, although not observed during focus surveys within the Study Area, the Study Area nonetheless contains suitable habitat for burrowing owls. MSHCP Objective 6 for burrowing owls requires that pre-construction surveys occur prior to site grading. Accordingly, prior to mitigation requiring pre-construction surveys, the Project has the potential to result in significant impacts to the burrowing owl.

Threshold d.: Less-than-Significant Impact. The Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and impacts would be less than significant.

Threshold e.: Significant Direct and Cumulatively-Considerable Impact. Implementation of the Project would result in permanent impacts to 0.05-acre of Disturbed Mulefat Scrub, which has components similar to the Southern Riparian Scrub plant community, and is the only sensitive natural community that occurs within the Project site; thus, Project impacts to 0.05-acre of Disturbed Mulefat Scrub would be significant prior to mitigation.

Threshold f.: Significant Direct and Cumulatively-Considerable Impact. The Project would impact 0.36-acre (5,766 linear feet) of Waters of the State under Regional Board jurisdiction, 0.44-acre of CDFW jurisdiction (0.39-acre non-riparian streambed and 0.05-acre riparian streambed), and a total of 0.44-acre of MSHCP jurisdiction (0.39-acre non-riparian streambed and 0.05-acre riparian streambed). Project impacts to jurisdictional areas within the Study Area would be significant prior to mitigation.

Threshold g.: No Impact. Aside from the MSHCP, which is addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). However, the Project site does not contain any oak trees subject to the Riverside County Oak Tree Management Guidelines. Additionally, the Project site does not occur at an elevation exceeding 5,000 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project. Therefore, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur.

### 4.4.7 Regulations, Design Requirements, and Mitigation

***Regulations and Design Requirements***

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

- Prior to issuance of grading permits, the Project Applicant shall make payment of Western Riverside County MSHCP fees pursuant to Riverside County Ordinance No. 810, *Establishing an Interim Open Space Mitigation Fee*.

- Prior to issuance of grading permits, the Project Applicant shall make payment of fees pursuant to the Stephen's Kangaroo Rat Habitat Conservation Plan and Riverside County Ordinance No. 663, *Establishing the Riverside County Stephens' Kangaroo Rat Habitat Conservation Plan and Setting Mitigation Fees*.

- Pursuant to JPR 09-12-14-01 and HANS determination letter HANS 1995, prior to final building inspection the Project Applicant shall provide the Western Riverside County Regional Conservation Authority (RCA) with fee title/ownership and management responsibilities for 61.42 acres of

proposed Conservation Area located within Planning Area 9 of proposed Specific Plan No. 380, Amendment No. 1.

- Prior to issuance of grading permits or other permits authorizing ground-disturbing activities, the Project Applicant shall provide the Riverside County Planning Department with copies of the appropriate Wildlife Agency permits to address impacts to 0.36-acre ( 5,766 linear feet) of Waters of the State under Regional Board jurisdiction and 0.44-acre of CDFW jurisdiction (0.39-acre non-riparian streambed and 0.05-acre riparian streambed), including a Waste Discharge Order pursuant to Section 13260 of the California Water Code from the San Diego Regional Water Quality Control Board (RWQCB), and a Section 1602 Streambed Alteration Agreement (SAA) from the California Department of Fish and Wildlife (CDFW).

***Mitigation***

MM 4.4-1 Prior to issuance of grading permits or other permits authorizing ground disturbance (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging), the Project Applicant shall provide evidence to Riverside County that Project impacts to 0.36-acre ( 5,766 linear feet) of Waters of the State under Regional Board jurisdiction, 0.44-acre of CDFW jurisdiction (0.39-acre non-riparian streambed and 0.05-acre riparian streambed), and 0.44-acre of riparian/riverine resources in the MSHCP (0.39-acre of MSHCP riverine and 0.05-acre of riparian areas) have been mitigated at a minimum 3:1 ratio (mitigation:impact) at the Riverpark Mitigation Bank or other mitigation bank, in-lieu program, or mitigation site as approved by the Western Riverside Regional Conservation Authority (RCA) and Wildlife Agencies.

MM 4.4-2 To avoid take of active burrowing owl burrows (nests) and in accordance with MSHCP Objective 6, prior to issuance of grading permits or other permits authorizing ground disturbance (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging), the Project Applicant shall retain a qualified biologist to perform a burrowing owl survey at all potentially suitable habitat sites within the Project's limits of disturbance within 30 days of the commencement of any ground-disturbing activities at the Project site, as discussed below.

- Pre-Construction Survey: The pre-construction survey shall be performed by a qualified biologist that will survey the site for the presence/absence of burrowing owls within 30 days prior to commencement of ground-disturbing activities at the Project site. The results of the survey should be submitted to Riverside County and the California Department of Fish and Wildlife (CDFW) within three days of survey completion. The pre-construction survey shall be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP.

- Burrowing Owl Management Plan: If active burrowing owl burrows are detected, the Project Applicant shall not commence activities until no sign is present that the burrows

are being used by adult or juvenile owls or following CDFW approval of a Burrowing Owl Plan as described below. If owl presence is difficult to determine, a qualified biologist shall monitor the burrows with motion- activated trail cameras for at least 24 hours to evaluate burrow occupancy. The onsite qualified biologist will verify the nesting effort has finished according to methods identified in the Burrowing Owl Plan.

The Burrowing Owl Plan shall be prepared in accordance with guidelines in the CDFW Staff Report on Burrowing Owl (March 2012) and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The qualified biologist and Project Applicant shall coordinate with the County of Riverside, CDFW, and United States Fish and Wildlife Service (USFWS) to develop a Burrowing Owl Plan to be approved by the County, CDFW, and USFWS prior to commencing Project activities. The Burrowing Owl Plan shall describe proposed avoidance, relocation, monitoring, minimization, and/or mitigation actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls or information on the adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls shall also be included in the Burrowing Owl Plan. The County shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval.

If burrowing owls are observed within Project site(s) during Project implementation and construction, the Project Applicant shall notify CDFW immediately in writing within 48 hours of detection. A Burrowing Owl Plan shall be submitted to CDFW for review and approval within two weeks of detection and no Project activity shall continue within 1,000 feet of the burrowing owls until CDFW approves the Burrowing Owl Plan. The County shall be responsible for implementing appropriate avoidance and mitigation measures, including burrow avoidance, passive or active relocation, or other appropriate mitigation measures as identified in the Burrowing Owl Plan.

If ground-disturbing activities occur but the site is left undisturbed for more than 30 days, a preconstruction survey for burrowing owl shall be conducted within 3 days prior to initiation of Project activities and reported to CDFW as described above. If burrowing owl are found, the same coordination described above shall be necessary.

A final report shall be prepared by the qualified biologist documenting the results of the burrowing owl surveys and detailing avoidance, minimization, and mitigation measures. The final report shall be submitted to the City and CDFW within 30 days of completion of the survey and burrowing monitoring for mitigation monitoring compliance record keeping.

MM 4.4-3 Prior to the issuance of grading permits, Riverside County shall ensure that the following note is included on the Project's grading plans. Project contractors shall be required to ensure compliance with this note and permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance. This note also shall be specified in bid documents issued to prospective construction contractors.

"*In order to avoid violation of the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Sections 3503, 3503.5, and 3513, vegetation clearing shall be conducted outside of the bird nesting season to the extent feasible. If avoidance of the nesting season is not feasible, a nesting bird survey shall be conducted by a qualified biologist within no more than 72 hours of such scheduled disturbance, to determine the presence of nests or nesting birds. The nest surveys shall include the Project site and adjacent areas where project activities have the potential to cause nest failure. The survey results shall be provided to the County's Planning Department. The Project Applicant shall adhere to the following:*

1) *The Project Applicant shall designate a biologist (Designated Biologist) experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.*

2) *Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than 3 days prior to the initiation of Project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the Project site; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.*

*If no nesting birds are observed during the survey, site preparation and construction activities may begin. If active nests are identified, avoidance or minimization measures shall be undertaken in consultation with the County of Riverside and CDFW. Measures shall include immediate establishment of an appropriate buffer zone to be established by a qualified biologist, and approved by the County of Riverside, based on their best professional judgement and experience. The buffer around the nest shall be delineated and flagged, and no construction activity shall occur within the buffer area until a qualified biologist determines nesting species have fledged and the nest is no longer active, or the nest has failed. The Designated Biologist shall monitor the nest at the onset of Project activities, and at the onset of any changes in such Project activities (e.g.,*

*increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the Designated Biologist determines that such Project activities may be causing an adverse reaction, the Designated Biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers will be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The onsite qualified biologist will review and verify compliance with these nesting avoidance buffers and will verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found. Within 30 days of completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to the County for mitigation monitoring compliance record keeping."*

### 4.4.8 Significance of Impacts After Mitigation

Threshold a.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-1 would require compensatory mitigation for Project impacts to 0.44-acre of MSHCP riparian/riverine resources (0.39-acre of riverine and 0.05-acre of riparian areas) at a minimum 3:1 ratio through the purchase of credits from the Riverpark Mitigation Bank or other mitigation bank, in-lieu program, or mitigation site as approved by the RCA and Wildlife Agencies, which would ensure Project consistency with Section 6.1.2 of the MSHCP. In addition, implementation of Mitigation Measure MM 4.4-2 would ensure that appropriate pre-construction burrowing owl surveys are conducted prior to ground disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl. With implementation of the required mitigation, the Project would be fully consistent with all applicable MSHCP requirements, and Project impacts would be reduced to below a level of significance.

Thresholds b. and c.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-2 would ensure that appropriate pre-construction burrowing owl surveys are conducted prior to ground disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl. With implementation of the required mitigation, Project impacts to the burrowing owl would be reduced to below a level of significance. In addition, in the event that Project construction activities occur during the nesting season for birds (February 1 to August 31), Mitigation Measure MM 4.4-3 would ensure pre-construction nesting surveys are conducted prior to commencement of construction activities, and further requires appropriate avoidance of any active nests that may be identified. Implementation of the required mitigation would ensure that Project impacts to sensitive wildlife species are reduced to below a level of significance.

Threshold e.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-1 would require compensatory mitigation for Project impacts to 0.44-acre of CDFW jurisdiction, which includes 0.05-acre of riparian streambed mapped as Disturbed Mulefat Scrub, at a minimum 3:1 mitigation-to-impact ratio through the purchase of mitigation credits at the Riverpark Mitigation Bank or other mitigation bank, in-lieu program, or mitigation site as approved by the RCA and

Wildlife Agencies, which would reduce Project impacts to 0.05-acre of Disturbed Mulefat Scrub to below a level of significance.

Threshold f.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-1 would require compensatory mitigation for Project impacts to 0.36-acre (5,766 linear feet) of Waters of the State under Regional Board jurisdiction, 0.44-acre of CDFW jurisdiction (0.39-acre non-riparian streambed and 0.05-acre riparian streambed), and a total of 0.44-acre of MSHCP jurisdiction (0.39-acre non-riparian streambed and 0.05-acre riparian streambed) at a minimum 3:1 mitigation-to-impact ratio through the purchase of mitigation credits at the Riverpark Mitigation Bank or other mitigation bank, in-lieu program, or mitigation site as approved by the RCA and Wildlife Agencies, which would reduce Project impacts to jurisdictional resources to below a level of significance.

### 4.4.9 References


| Cited As | Reference |
|---|---|
| GLA, 2024 | Glenn Lukos Associates, Inc., 2024. *Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis for Impacts to MSHCP Riparian/Riverine Areas, Keller Crossing Residential Development Project and Offsite Improvements Located in the Community of French Velley, County of Riverside, California*. June 2024. Included as EIR *Technical Appendix C2*. |
| GLA, 2025 | Glenn Lukos Associates, Inc., 2025. *Biological Technical Report for Keller Crossing Residential Development Project and Offsite Improvements*. September 2025. Included as EIR *Technical Appendix C1*. |
| GLA, 2026 | Glenn Lukos Associates, Inc., 2026. *Biological Technical Report Addendum for Keller Crossing Residential Development Project And Offsite Improvements*. March 19, 2026. Included as EIR *Technical Appendix C3*. |
| Riverside County, 2015 | Riverside County, 2015. *County of Riverside Draft Environmental Impact Report No. 521*. February 2015. Available on-line at: https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015. |
| Urban Crossroads, 2025d | Urban Crossroads, Inc., 2025d. *Keller Crossing Specific Plan Noise Impact Analysis*. May 20, 2025. Included as EIR *Technical Appendix J*. |

# 4.5 CULTURAL RESOURCES

The analysis in this subsection is based on two site-specific Cultural Resources Assessments prepared by Brian F. Smith and Associates ("BFSA"). The original report is titled "A Phase I Cultural Resources Assessment for the Renaissance Ranch Project" (herein, "2021 CRA"), is dated November 3, 2021, and included as *Technical Appendix D1* (BFSA, 2021). An updated cultural resources investigation also was conducted by BFSA, the results of which are presented in a Project-specific technical report, titled "Cultural Resources Update Assessment for the Keller Crossing Project (SP 380; GA 951), Riverside County, California" (herein, "2024 CRA Update"), dated August 12, 2024, and included in *Technical Appendix D2* (BFSA, 2024). The 2024 CRA Update generally affirms that the findings and conclusions remain consistent with those presented in the original 2021 CRA. All references used in this subsection are provided in EIR Section 7.0, *References*.

It should be noted that confidential information has been redacted from *Technical Appendices D1* and *D2* for purposes of public review. In addition, much of the written and oral communication between Native American tribes, the County of Riverside, and BFSA is considered confidential in respect to places that have traditional tribal cultural significance (Gov. Code § 65352.4), and although relied upon in part to inform the preparation of this EIR Subsection, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs. § 15120(d)).

## 4.5.1 Existing Conditions

### A. Prehistoric and Historic Setting

Paleo Indian, Archaic Period Milling Stone Horizon, and the Late Prehistoric Takic groups are the three general cultural periods represented in Riverside County. The following discussion of the cultural history of Riverside County references the San Dieguito Complex, Encinitas Tradition, Milling Stone Horizon, La Jolla Complex, Pauma Complex, and San Luis Rey Complex, since these culture sequences have been used to describe archaeological manifestations in the region. The Late Prehistoric component present in the Riverside County area was primarily represented by the Cahuilla, Gabrielino, and Luiseño Indians. (BFSA, 2021, p. 2.0-8)

#### *1. Paleo Indian Period (Late Pleistocene)*

Archaeologically, the Paleo Indian Period is associated with the terminus of the late Pleistocene (12,000 to 10,000 Years Before Present [YBP]). The environment during the late Pleistocene was cool and moist, which allowed for glaciation in the mountains and the formation of deep, pluvial lakes in the deserts and basin lands. However, by the terminus of the late Pleistocene, the climate became warmer, which caused the glaciers to melt, sea levels to rise, greater coastal erosion, large lakes to recede and evaporate, extinction of Pleistocene megafauna, and major vegetation changes. The coastal shoreline at 10,000 YBP, depending upon the particular area of the coast, was near the 30-meter isobath, or two to six kilometers further west than its present location. (BFSA, 2021, p. 2.0-8)

Paleo Indians were likely attracted to multiple habitat types, including mountains, marshlands, estuaries, and lakeshores. These people likely subsisted using a more generalized hunting, gathering, and collecting adaptation utilizing a variety of resources including birds, mollusks, and both large and small mammals. (BFSA, 2021, p. 2.0-8)

*2. Archaic Period (Early and Middle Holocene: circa 9,000 to 1,300 YBP)*

Archaeological data indicates that between 9,000 and 8,000 YBP, a widespread complex was established in the southern California region, primarily along the coast. This complex is locally known as the La Jolla Complex, which is regionally associated with the Encinitas Tradition and shares cultural components with the widespread Milling Stone Horizon. The coastal expression of this complex appeared in southern California coastal areas and focused upon coastal resources and the development of deeply stratified shell middens that were primarily located around bays and lagoons. The older sites associated with this expression are located at Topanga Canyon, Newport Bay, Agua Hacienda Lagoon, and some of the Channel Islands. Radiocarbon dates from sites attributed to this complex span a period of over 7,000 years in this region, beginning over 9,000 YBP. (BFSA, 2021, pp. 2.0-8 to 2.0-9)

The Encinitas Tradition is best recognized for its pattern of large coastal sites characterized by shell middens, grinding tools that are closely associated with the marine resources of the area, cobble-based tools, and flexed human burials. While ground stone tools and scrapers are the most recognized tool types, coastal Encinitas Tradition sites also contain numerous utilized flakes, which may have been used to pry open shellfish. Artifact assemblages at coastal sites indicate a subsistence pattern focused upon shellfish collection and nearshore fishing. This suggests an incipient maritime adaptation with regional similarities to more northern sites of the same period. Other artifacts associated with Encinitas Tradition sites include stone bowls, doughnut stones, discoidals, stone balls, and stone, bone, and shell beads. (BFSA, 2021, p. 2.0-9)

The coastal lagoons in southern California supported large Milling Stone Horizon populations circa 6,000 YBP, as is shown by numerous radiocarbon dates from the many sites adjacent to the lagoons. The ensuing millennia were not stable environmentally, and by 3,000 YBP, many of the coastal sites in central San Diego County had been abandoned. The abandonment of the area is usually attributed to the sedimentation of coastal lagoons and the resulting deterioration of fish and mollusk habitat. This is a well-documented situation at Batiquitos Lagoon, where over a two-thousand-year period, dominant mollusk species occurring in archaeological middens shift from deep-water mollusks (*Argopecten* sp.) to species tolerant of tidal flat conditions (*Chione* sp.), indicating water depth and temperature changes. (BFSA, 2021, p. 2.0-9)

This situation likely occurred for other small drainages (Buena Vista, Agua Hedionda, San Marcos, and Escondido creeks) along the central San Diego coast where low flow rates did not produce sufficient discharge to flush the lagoons they fed (Buena Vista, Agua Hedionda, Batiquitos, and San Elijo lagoons). Drainages along the northern and southern San Diego coastline were larger and flushed the coastal hydrological features they fed, keeping them open to the ocean and allowing for continued human exploitation. Peñasquitos Lagoon exhibits dates as late as 2,355 YBP and San Diego Bay showed continuous

occupation until the close of the Milling Stone Horizon. Additionally, data from several drainages in Camp Pendleton indicate a continued occupation of shell midden sites until the close of the period, indicating that coastal sites were not entirely abandoned during this time. (BFSA, 2021, p. 2.0-9)

By 5,000 YBP, an inland expression of the La Jolla Complex is evident in the archaeological record, exhibiting influences from the Campbell Tradition from the north. These inland Milling Stone Horizon sites have been termed "Pauma Complex." By definition, Pauma Complex sites share a predominance of grinding implements (manos and metates), lack mollusk remains, have greater tool variety (including atlatl dart points, quarry-based tools, and crescentics), and seem to express a more sedentary lifestyle with a subsistence economy based upon the use of a broad variety of terrestrial resources. Although originally viewed as a separate culture from the coastal La Jolla Complex, it appears that these inland sites may be part of a subsistence and settlement system utilized by the coastal peoples. Evidence from the 4S Project in inland San Diego County suggests that these inland sites may represent seasonal components within an annual subsistence round by La Jolla Complex populations. Including both coastal and inland sites of this time period in discussions of the Encinitas Tradition, therefore, provides a more complete appraisal of the settlement and subsistence system exhibited by this cultural complex. (BFSA, 2021, p. 2.0-10)

Refer to subsection 2.3.3 of EIR *Technical Appendix D1* for a complete description of the Archaic Period.

*3. Late Prehistoric Period (Late Holocene: 1,300 YBP to 1790)*

Many Luiseño hold the world view that as a population they were created in southern California. Archaeological and anthropological data, however, proposes a scientific/archaeological perspective, suggesting that at approximately 1,350 YBP, Takic-speaking groups from the Great Basin region moved into Riverside County, marking the transition to the Late Prehistoric Period. An analysis of the Takic expansion indicates that inland southern California was occupied by "proto-Yuman" populations before 1,000 YBP. As a result, it is believed that Takic expansion occurred starting around 3,500 YBP moving toward southern California, with the Gabrielino language diffusing south into neighboring Yuman (Hokan) groups around 1,500 to 1,000 YBP, possibly resulting in the Luiseño dialect. (BFSA, 2021, p. 2.0-11)

The final Takic expansion would not have occurred until about 1,000 YBP, resulting in Vanyume, Serrano, Cahuilla, and Cupeño dialects. Evidence suggests that the Luiseño did not simply replace Hokan speakers, but were rather a northern San Diego County/southern Riverside County Yuman population who adopted the Takic language. This period is characterized by higher population densities and elaborations in social, political, and technological systems. Economic systems diversified and intensified during this period with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, yet effective, technological innovations. Technological developments during this period included the introduction of the bow and arrow between A.D. 400 and 600 and the introduction of ceramics. Atlatl darts were replaced by smaller arrow darts, including Cottonwood series points. Other hallmarks of the Late Prehistoric Period include extensive trade networks as far-reaching as the Colorado River Basin and cremation of the dead. (BFSA, 2021, pp. 2.0-11 to 2.0-12)

*4. Protohistoric Period (Late Holocene: 1790 to Present)*

Ethnohistoric and ethnographic evidence indicates that three Takic-speaking groups occupied portions of Riverside County: the Cahuilla, the Gabrielino, and the Luiseño. The geographic boundaries between these groups in pre- and proto-historic times are difficult to place, but the Project site is located well within the borders of ethnographic Luiseño territory. This group was a seasonal hunting and gathering people with cultural elements that were very distinct from Archaic Period peoples. These distinctions include cremation of the dead, the use of the bow and arrow, and exploitation of the acorn as a main food staple. Along the coast, the Luiseño made use of available marine resources by fishing and collecting mollusks for food. Seasonally available terrestrial resources, including acorns and game, also were sources of nourishment for Luiseño groups. Elaborate kinship and clan systems between the Luiseño and other groups facilitated a wide-reaching trade network that included trade of Obsidian Butte obsidian and other resources from the eastern deserts, as well as steatite from the Channel Islands. (BFSA, 2021, p. 2.0-12)

The primary settlements of Late Prehistoric Luiseño Indians in the San Jacinto Plain were represented by Ivah and Soboba near Soboba Springs, Jusipah near the town of San Jacinto, Ararah in Webster's Canyon en route to Idyllwild, Pahsitha near Big Springs Ranch southeast of Hemet, and Corova in Castillo Canyon. These locations share features such as the availability of food and water resources. Features of this land use include petroglyphs and pictographs, as well as widespread milling, which is evident in bedrock and portable implements. Groups in the vicinity of the project, neighboring the Luiseño, include the Cahuilla and the Gabrielino. Ethnographic data for the three groups is presented in subsection 2.3.5 of the 2021 CRA (*Technical Appendix D1*). (BFSA, 2021, p. 2.0-12)

*5. Ethnohistoric Period (1769 to Present)*

Traditionally, the history of the state of California has been divided into three general periods: the Spanish Period (1769 to 1821), the Mexican Period (1822 to 1846), and the American Period (1848 to present). The American Period is often further subdivided into additional phases: the nineteenth century (1848 to 1900), the early twentieth century (1900 to 1950), and the Modern Period (1950 to present). From an archaeological standpoint, all of these phases can be referred to together as the Ethnohistoric Period. This provides a valuable tool for archaeologists, as ethnohistory is directly concerned with the study of indigenous or non-Western peoples from a combined historical/anthropological viewpoint, which employs written documents, oral narrative, material culture, and ethnographic data for analysis. (BFSA, 2021, p. 2.0-19)

European exploration along the California coast began in 1542 with the landing of Juan Rodriguez Cabrillo and his men at San Diego Bay. Sixty years after the Cabrillo expeditions, an expedition under Sebastian Viscaíno made an extensive and thorough exploration of the Pacific coast. Although the voyage did not extend beyond the northern limits of the Cabrillo track, Viscaíno had the most lasting effect upon the nomenclature of the coast. Many of his place names have survived, whereas practically every one of the names created by Cabrillo have faded from use. For instance, Cabrillo named the first (now) United States port he stopped at "San Miguel"; 60 years later, Viscaíno changed it to "San Diego." The early European voyages observed Native Americans living in villages along the coast but did not make any substantial, long-lasting impact. At the time of contact, the Luiseño population was estimated to have ranged from 4,000 to as many as 10,000 individuals. (BFSA, 2021, p. 2.0-19)

Up until this time, the only known way to feasibly travel from Sonora to Alta California was by sea. In 1774, Juan Bautista de Anza, an army captain at Tubac, requested and was given permission by the governor of the Mexican State of Sonora to establish an overland route from Sonora to Monterey. In doing so, Juan Bautista de Anza passed through Riverside County and described the area in writing for the first time. In 1797, Father Presidente Lausen (of Mission San Diego de Alcalá), Father Norberto de Santiago, and Corporal Pedro Lisalde (of Mission San Juan Capistrano) led an expedition through southwestern Riverside County in search of a new mission site to establish a presence between San Diego and San Juan Capistrano. Their efforts ultimately resulted in the establishment of Mission San Luis Rey in Oceanside, California. (BFSA, 2021, p. 2.0-19)

These early colonization efforts were followed by the establishment of estancias at Puente (circa 1816) and San Bernardino (circa 1819) near Guachama. These efforts were soon mirrored by the Spaniards from Mission San Luis Rey, who in turn established a presence in what is now Lake Elsinore, Temecula, and Murrieta. The indigenous groups who occupied these lands were recruited by missionaries, converted, and put to work in the missions. Throughout this period, the Native American populations were decimated by introduced diseases, a drastic shift in diet resulting in poor nutrition, and social conflicts due to the introduction of an entirely new social order. (BFSA, 2021, p. 2.0-20)

Mexico achieved independence from Spain in 1822 and became a federal republic in 1824. As a result, both Baja and Alta California became classified as territories. Shortly thereafter, the Mexican Republic sought to grant large tracts of private land to its citizens to begin to encourage immigration to California and to establish its presence in the region. Part of the establishment of power and control included the desecularization of the missions circa 1832. These same missions were also located on some of the most fertile land in California and, as a result, were considered highly valuable. The resulting land grants, known as “ranchos,” covered expansive portions of California and by 1846, more than 600 land grants had been issued by the Mexican government. Rancho Jurupa was the first rancho to be established and was issued to Juan Bandini in 1838. Although Bandini primarily resided in San Diego, Rancho Jurupa was located in what is now Riverside County. A review of Riverside County place names quickly illustrates that many of the ranchos in Riverside County lent their names to present-day locations, including Jurupa, El Rincon, La Sierra, El Sobrante de San Jacinto, La Laguna (Lake Elsinore), Santa Rosa, Temecula, Pauba, San Jacinto Nuevo y Potrero, and San Jacinto Viejo. As was typical of many ranchos, these were all located in the valley environments within western Riverside County. (BFSA, 2021, p. 2.0-20)

Native American culture had been disrupted to the point where they could no longer rely upon prehistoric subsistence and social patterns. Not only does this illustrate how dependent the Native Americans had become upon the missionaries, but it also indicates a marked contrast in the way the Spanish treated the Native Americans compared to the Mexican and United States ranchers. Spanish colonialism (missions) is based upon utilizing human resources while integrating them into their society. The Mexican and American ranchers did not accept Native Americans into their social order and used them specifically for the extraction of labor, resources, and profit. Rather than being incorporated, they were either subjugated or exterminated. (BFSA, 2021, p. 2.0-21)

By 1846, tensions between the United States and Mexico had escalated to the point of war. In order to reach a peaceful agreement, the Treaty of Guadalupe Hidalgo was put into effect in 1848, which resulted in the annexation of California to the United States. Once California opened to the United States, waves of settlers moved in searching for gold mines, business opportunities, political opportunities, religious freedom, and adventure. By 1850, California had become a state and was eventually divided into 27 separate counties. While a much larger population was now settling in California, this was primarily in the central valley, San Francisco, and the Gold Rush region of the Sierra Nevada mountain range. During this time, southern California grew at a much slower pace than northern California and was still dominated by the cattle industry that was established during the earlier rancho period. However, by 1859, the first United States Post Office in what would eventually become Riverside County was set up at John Magee's store on the Temecula Rancho. (BFSA, 2021, p. 2.0-21)

With the completion of the Southern Pacific Railroad in 1869, southern California saw its first major population expansion. The population boom continued circa 1874 with the completion of connections between the Southern Pacific Railroad in Sacramento to the transcontinental Central Pacific Railroad in Los Angeles. The population influx brought farmers, land speculators, and prospective developers to the region. As the Jurupa area became more and more populated, circa 1870, Judge John Wesley North and a group of associates founded the city of Riverside on part of the former rancho. (BFSA, 2021, p. 2.0-22)

Although the first orange trees were planted in Riverside County circa 1871, it was not until a few years later when a small number of Brazilian navel orange trees were established that the citrus industry truly began in the region. The Brazilian navel orange was well suited to the climate of Riverside County and thrived with assistance from several extensive irrigation projects. At the close of 1882, an estimated half a million citrus trees were present in California. It is estimated that nearly half of that population was in Riverside County. Population growth and 1880s tax revenue from the booming citrus industry prompted the official formation of Riverside County in 1893 out of portions of what was once San Bernardino County. (BFSA, 2021, p. 2.0-22)

Shortly thereafter, with the start of World War I, the United States began to develop a military presence in Riverside County with the construction of March Air Reserve Base. During World War II, Camp Haan and Camp Anza were constructed in what is now the current location of the National Veteran's Cemetery. In the decades that followed, populations spread throughout the county into Lake Elsinore, Corona, Norco, Murrieta, and Wildomar. However, a significant portion of the county remained largely agricultural well into the 1970s. Following the 1970s, Riverside saw a period of dramatic population increase as the result of new development, more than doubling the population of the county with a population of over 1.3 million residents. (BFSA, 2024, p. 2.0-22)

## B. Methods

The archaeological program for the proposed Project consisted of institutional records searches, intensive pedestrian surveys of the on-site Project area and off-site improvement locations by qualified archaeologists, and preparation of a technical report. The Project's archaeological study conforms to the

Riverside County Cultural Resource Guidelines (Draft) and the statutory requirements of CEQA. Specific definitions for archaeological resource type(s) used in this report are those established by the State Historic Preservation Office (SHPO). In addition, an updated pedestrian survey was conducted on June 28, 2024, which reconfirmed the findings of the 2021 CRA. (BFSA, 2021, p. 3.0-1; BFSA, 2024)

## C. Results

Provided below is a summary of the results of the Project's 2021 CRA (*Technical Appendix D1*). Refer to Section 4.0 of the 2021 CRA for a complete description of the results of the cultural resources investigation.

### *1. Archaeological Records Search Result*

An archaeological records search for the on-site and off-site Project areas and the surrounding area was requested from the Eastern Information Center (EIC) at the University of California, Riverside (UCR) on March 26 and May 3, 2021 (Appendix C of the 2021 CRA, included as EIR *Technical Appendix D1*). However, due to the limitations imposed by the evolving circumstances related to the COVID-19 pandemic, records search access has become limited and the results are only partially complete. Further limited records search data for the project was also gleaned from previous studies conducted by PCR Services Corporation (PCR). (BFSA, 2021, p. 4.0-1)

The search results identified 16 cultural resources surrounding the on-site and off-site Project areas, one of which (P-33-011258) partially overlaps the Project site (refer also to Table 4.1–1 of the 2021 CRA, included as EIR *Technical Appendix D1*). In total these resources include two historic sites (site forms not provided by EIC), one historic refuse scatter, two historic single-family residences, two historic road segments, five prehistoric sites (site forms not provided by EIC), two prehistoric bedrock milling feature sites, one historic prospect pit, and one historic culvert. (BFSA, 2021, p. 4.0-1)

The records search results also indicate that 55 studies have been conducted surrounding the on-site and off-site Project areas (see Table 4.1–2 in Appendix E of the 2021 CRA, included as EIR *Technical Appendix D1*). The primary reports concerning the property are the studies conducted by PRC in 2009 and 2010. As the text from these studies was available, it was used to help facilitate more accurate records search results. (BFSA, 2021, p. 4.0-2)

PRC indicates that in 2009, 21 cultural resource studies had been conducted within a one-mile radius of the Project area. These studies were conducted from 1978 to 2005 and encompassed approximately 50 percent of the one-mile search radius around the Project site. In addition, PCR indicates that in 2009, 33 cultural sites had been recorded within the one-mile radius of the Project, including 26 prehistoric sites, one prehistoric isolate, and six historic-period sites. The 26 prehistoric sites were noted as being mainly comprised of bedrock milling features, but also include a quarry, lithic scatters, a prehistoric isolate, and prehistoric rock features. The historic-period sites include a single-family residence, wall/fence/cistern/structural pads, a shack, a refuse scatter, and a prospect pit. One of these sites, P-33-011258 (a historic refuse scatter) was previously recorded within the current on-site Project area. Review of historic aerial imagery and historic United States Geologic Service (USGS) maps revealed that the Project site and vicinity remained relatively undeveloped through the historic period. (BFSA, 2021, p. 4.0-2)

PRC indicates that in 2010, 40 cultural resource studies had been conducted within a one-mile radius of the current off-site improvement areas. Many of these reports likely overlap studies identified in the 2009 records search. An additional 60 resources (prehistoric and historic) were identified within a one-mile radius of the off-site areas, many of which likely overlap with the 2009 data. The 2010 PRC study identified Site P-33-017628 (two isolate metate fragments) within the off-site improvement areas in close proximity to Pourroy Road; however, this offsite improvement is no longer part of the proposed Project. The PRC records search also identified Site P-33-014370, a prehistoric archaeological district, that was recorded as partially overlapping the offsite roadway improvement area at the intersection of Winchester Road (SR 79) and Domenigoni Parkway. (BFSA, 2021, p. 4.0-2)

BFSA also reviewed the following sources to help facilitate a better understanding of the historic use of the property: (BFSA, 2021, p. 4.0-2)

- The National Register of Historic Places (NRHP) index
- Historic USGS data
- Historic aerial photographs (1938, 1967, 1978, 1996, 2002, and 2005)

These sources did not indicate the presence of any additional archaeological resources within the Project site or off-site improvement areas. However, for background research, the absence of positive results does not necessarily indicate the absence of resources. When available, the EIC records search may still indicate the presence of additional recorded sites within or in the vicinity of the Project. (BFSA, 2021, p. 4.0-2)

BFSA also requested a Sacred Lands File (SLF) search from the Native American Heritage Commission (NAHC) to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present within one mile of the Project site. The NAHC SLF search did not indicate the presence of sacred sites or locations of religious or ceremonial importance within the search radius. In accordance with the recommendations of the NAHC, BFSA contacted all Native American consultants listed in the NAHC response letter at least two weeks prior to the initiation of the field survey. (BFSA, 2021, pp. 4.0-2 to 4.0-3)

A response was received from the Cahuilla Band of Indians during the two-week interim period, who requested that a tribal monitor be present for all ground-disturbing activities, including the survey, and to be notified of Project updates. BFSA directly contacted BobbyRay Esparza, Cultural Coordinator for the Cahuilla Band and a representative from the tribe, who was invited to voluntarily participate in the survey of the property. (BFSA, 2021, p. 4.0-3)

After the two-week interim period, responses were received from the Quechan Historic Preservation Officer, who defers to other tribes in the area; the Rincon Band of Luiseño Indians, who indicated that although they do not have knowledge of cultural resources in the Project area, they recommended that an archaeological records search be conducted and that a copy of the results be provided to the Rincon Band; and the Agua Caliente Band of Cahuilla Indians, who indicated that the Project area is not located within the boundaries of their reservation, but it is within their Traditional Use Area. Agua Caliente did not indicate, however, if they

had any knowledge of sites within the project. All correspondence is provided in Appendix D of the Project's CRA, included as EIR *Technical Appendix D1*. (BFSA, 2024, p. 4.0-3)

*2. Results of the Field Survey*

An archaeological survey of the Project site and the Project's proposed off-site improvement areas was completed on April 13, May 10, and October 22, 2021 by BFSA. An updated pedestrian survey also was conducted on June 28, 2024. Aerial photographs, maps, and a compass permitted orientation and location of Project boundaries. The entire property, including the off-site areas, were surveyed in five- to 15-meter spaced transects. A survey form, field notes, and photographs documented the survey work undertaken. (BFSA, 2021, p. 4.0-3; BFSA, 2024, p. 2)

❑ **On-Site Survey Results**

The archaeological survey for the on-site portion of the Project originally was conducted on April 13, 2021, while an updated pedestrian survey was conducted on June 28, 2024. The 2024 pedestrian survey generally reconfirmed the findings from the 2021 CRA. As described by the 2021 CRA, the Project site is characterized as rural agricultural land crossed by dirt access roads, with rolling hills and higher elevations in the northeast, east, and north-central areas. Historically, the majority of the Project site has been utilized for dry wheat farming, with the remainder supporting native/naturalized vegetation. Currently a high frequency of non-native grassland and Riversidean sage scrub occurs in the northeastern portion of the property, with smaller patches surrounding the on-site knolls. Two small patches of mulefat scrub occur in the southwest corner and small pockets of herbaceous wetland occur along a drainage in the northeast portion. (BFSA, 2021, p. 4.0-3; BFSA, 2024, p. 2)

During the 2021 and 2024 surveys, previously recorded historic Site P-33-011258 was relocated and a historic concrete wildlife guzzler (Temp-1) was identified within the Project site. Site P-33-011258 was recorded in 2001 as a concentration of miscellaneous historic objects covering an area measuring approximately 10 meters in diameter. Cultural materials identified as part of the refuse scatter included graniteware, a wash basin, cans, glass, sheet metal, fencing, wire, and farm machinery. Given the low frequency of materials, the site appears to be a single-episode dumping location. Further analysis of Site P-33-011258 in 2009 evaluated the resource as not significant and not eligible for listing on the California Register of Historical Resources (CRHR). The current surface review of P-33-011258 indicates that little has changed since the initial recording of the site. (BFSA, 2021, p. 4.0-6; BFSA, 2024, p. 2)

Site Temp-1 was identified as a historic concrete wildlife guzzler constructed between 1938 and 1967 (based upon historic aerial photographs). In general, a "guzzler" is a term used for artificial water catchments for terrestrial wildlife. The term was originally coined in 1943 as "gallinaceous guzzler" by Ben Glading, who, at the time, was head of the California Department of Fish and Game (now the California Department of Fish and Wildlife [CDFW]). The guzzler was seen as a solution to the absence of available surface water for small game species in many parts of California. At the time, the CDFW made a major effort to develop water for gallinaceous birds, especially California quail (Lophortyx californica), mourning dove (Zenaidura macroura), and the introduced chukar partridge (Alectoris chukar). The CDFW would continue to do so over the next

several decades. Across private property, guzzlers were often used to make up for the loss of available surface water caused by the presence of livestock. In general, a guzzler consists of an apron for collecting precipitation, a tank to store it in, and access to the water by different-sized wildlife species. Smaller guzzlers, such as the one identified at Temp-1, were often constructed to primarily serve wild avian populations. (BFSA, 2021, p. 4.0-6)

The guzzler identified at Temp-1 is largely intact and consists of a shallow concrete water catchment basin that feeds directly into a concrete cistern with a domed roof. A small entry point can be seen on the southern portion of the cistern with vertical metal bars to prevent access by larger predators. The guzzler itself consists of a cylindrical cement tank that partially extends underground. The top of the tank is slightly convex and measures three by six feet. The opening to the north, which would allow wildlife to access the water reserves, measures approximately four feet wide and one foot high at its highest point. A fractured concrete pad that serves as a means of water collection for the guzzler connects to the tank at the west corner and measures 22 feet north/south and 23 feet east/west. No visible markings are present on the guzzler that might suggest age of construction, although the top is marked "E-71." However, this is not likely a construction date since historic aerial photographs indicate the presence of the guzzler prior to 1967. (BFSA, 2021, p. 4.0-6)

Due to the nature of the historic feature associated with Site Temp-1 and the lack of additional cultural constituents related to the feature, no subsurface testing was conducted at the site. The documentation of this site has exhausted any further research potential. Site Temp-1 contains no additional research value, has no associated cultural materials, is not clearly associated with any historically noteworthy individuals or events, and, therefore, does not meet the significance criteria thresholds provided in CEQA and is not considered eligible for listing on the CRHR. No additional archaeological study is recommended for the resources within the Project site. (BFSA, 2021, p. 4.0-9)

❑ **Off-Site Survey Results**

The archaeological survey for the off-site portion of the project was conducted on May 10 and October 22, 2021. The off-site survey areas included locations for archaeological review along Keller Road between Leon Road and Washington Street; a portion of Winchester Road (SR 79) between Scott Road and Keller Road; a portion of Pourroy Road between Winchester Road (SR 79) and Via Curtidor; and a small section of Winchester Road (SR 79) at La Alba Drive. Based upon the 2009 and 2010 PCR studies and records search data, no cultural resources were previously identified within the off-site project area alignments. Further, no additional resources were identified as a result of the survey program for the proposed off-site improvement areas. (BFSA, 2021, pp. 4.0-9 to 4.0-10)

### 4.5.2 Applicable Regulatory Requirements

#### A. Federal Regulations

*1. National Historic Preservation Act*

The National Historic Preservation Act of 1966 (NHPA) was passed primarily to acknowledge the importance of protecting our nation's heritage. While Congress recognized that national goals for historic preservation

could best be achieved by supporting the drive, enthusiasm, and wishes of local citizens and communities, it understood that the federal government must set an example through enlightened policies and practices. In the words of the Act, the federal government's role would be to "provide leadership" for preservation, "contribute to" and "give maximum encouragement" to preservation, and "foster conditions under which our modern society and our prehistoric and historic resources can exist in productive harmony."

NHPA and related legislation sought a partnership among the federal government and the states that would capitalize on the strengths of each. The federal government, led by the National Park Service (NPS) provides funding assistance; basic technical knowledge and tools; and a broad national perspective on America's heritage. The states, through State Historic Preservation Officers (SHPOs) appointed by the governor of each state, would provide matching funds, a designated state office, and a statewide preservation program tailored to state and local needs and designed to support and promote state and local historic preservation interests and priorities.

An Advisory Council on Historic Preservation (ACHP), the first and only federal entity created solely to address historic preservation issues, was established as a cabinet-level body of Presidentially-appointed citizens, experts in the field, and federal, state, and local government representatives, to ensure that private citizens, local communities, and other concerned parties would have a forum for influencing federal policy, programs, and decisions as they impacted historic properties and their attendant values. Section 106 of NHPA granted legal status to historic preservation in federal planning, decision-making, and project execution. Section 106 requires all federal agencies to take into account the effects of their actions on historic properties, and provide ACHP with a reasonable opportunity to comment on those actions and the manner in which federal agencies are taking historic properties into account in their decisions.

A number of additional executive and legislative actions have been directed toward improving the ways in which all federal agencies manage historic properties and consider historic and cultural values in their planning and assistance. Executive Order 11593 (1971) and, later, Section 110 of NHPA (1980, amended 1992), provided the broadest of these mandates, giving federal agencies clear direction to identify and consider historic properties in federal and federally assisted actions. The National Historic Preservation Amendments of 1992 further clarified Section 110 and directed federal agencies to establish preservation programs commensurate with their missions and the effects of their authorized programs on historic properties.

*2. National Register of Historic Places (NRHP)*

The National Register of Historic Places is the official list of the Nation's historic places worthy of preservation. Authorized by the NHPA of 1966, the NPS's National Register of Historic Places (NRHP) is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archaeological resources.

To be considered eligible, a property must meet the National Register Criteria for Evaluation. This involves examining the property’s age, integrity, and significance, as follows:

- Age and Integrity. Is the property old enough to be considered historic (generally at least 50 years old) and does it still look much the way it did in the past?

- Significance. Is the property associated with events, activities, or developments that were important in the past? With the lives of people who were important in the past? With significant architectural history, landscape history, or engineering achievements? Does it have the potential to yield information through archaeological investigation about our past?

Nominations can be submitted to a SHPO from property owners, historical societies, preservation organizations, governmental agencies, and other individuals or groups. The SHPO notifies affected property owners and local governments and solicits public comment. If the owner (or a majority of owners for a district nomination) objects, the property cannot be listed but may be forwarded to the NPS for a Determination of Eligibility (DOE). Listing in the NRHP provides formal recognition of a property's historical, architectural, or archaeological significance based on national standards used by every state.

Under Federal Law, the listing of a property in the National Register places no restrictions on what a non-federal owner may do with their property up to and including destruction, unless the property is involved in a project that receives Federal assistance, usually funding or licensing/permitting. National Register listing does not lead to public acquisition or require public access.

*3. National Historic Landmarks Program*

National Historic Landmarks (NHLs) are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. Today, over 2,600 historic places bear this national distinction. Working with citizens throughout the nation, the NHL Program draws upon the expertise of NPS staff who guide the nomination process for new Landmarks and provide assistance to existing Landmarks.

*4. American Indian Religious Freedom Act*

The American Indian Religious Freedom Act (AIRFA) (42 U.S.C § 1996.) requires each executive branch agency with statutory or administrative responsibility for the management of Federal lands, to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, to accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and avoid adversely affecting the physical integrity of such sacred sites. Where appropriate, agencies are also required to maintain the confidentiality of sacred sites. Each executive branch agency with statutory or administrative responsibility for the management of Federal lands are required to implement procedures to ensure reasonable notice is provided of proposed actions or land management policies that may restrict future access to or ceremonial use of, or adversely affect the physical integrity of, sacred sites.

*5. Native American Graves Protection and Repatriation Act (NAGPRA)*

The Native American Graves Protection and Repatriation Act (NAGPRA; Public Law 101-601; 25 U.S.C. 3001-3013) describes the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian

organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation.

One major purpose of this statute is to require that federal agencies and museums receiving Federal funds inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items. The agencies and museums must consult with Indian Tribes and Native Hawaiian organizations to attempt to reach agreements on the repatriation or other disposition of these remains and objects. Once lineal descent or cultural affiliation has been established, and in some cases the right of possession also has been demonstrated, lineal descendants, affiliated Indian Tribes, or affiliated Native Hawaiian organizations normally make the final determination about the disposition of cultural items. Disposition may take many forms from reburial to long term curation, according to the wishes of the lineal descendent(s) or culturally affiliated Tribe(s).

The second major purpose of the statute is to provide greater protection for Native American burial sites and more careful control over the removal of Native American human remains, funerary objects, sacred objects, and items of cultural patrimony on Federal and tribal lands. NAGPRA requires that Indian tribes or Native Hawaiian organizations be consulted whenever archaeological investigations encounter, or are expected to encounter, Native American cultural items or when such items are unexpectedly discovered on Federal or tribal lands. Excavation or removal of any such items also must be done under procedures required by the Archaeological Resources Protection Act. This NAGPRA requirement is likely to encourage the in-situ preservation of archaeological sites, or at least the portions of them that contain burials or other kinds of cultural items.

Other provisions of NAGPRA: (1) stipulate that illegal trafficking in human remains and cultural items may result in criminal penalties; (2) authorizes the Secretary of the Interior to administer a grants program to assist museums and Indian Tribes in complying with certain requirements of the statute; (3) requires the Secretary of the Interior to establish a Review Committee to provide advice and assistance in carrying out key provisions of the statute; authorizes the Secretary of the Interior to penalize museums that fail to comply with the statute; and, (5) directs the Secretary to develop regulations in consultation with this Review Committee.

### 6. *Federal Antiquities Act*

The Antiquities Act is the first law to establish that archaeological sites on public lands are important public resources. It obligates federal agencies that manage the public lands to preserve for present and future generations the historic, scientific, commemorative, and cultural values of the archaeological and historic sites and structures on these lands. It also authorizes the President to protect landmarks, structures, and objects of historic or scientific interest by designating them as National Monuments.

## B. State Regulations

### *1. California Administrative Code, Title 14, Section 4308*

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: "No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value."

### *2. California Register of Historic Resources*

The State Historical Resources Commission has designed this program for use by state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The Register is the authoritative guide to the state's significant historical and archaeological resources. The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA.

In order for a resource to be included on the Register of Historic Resources, the resources must meet one of the following criteria:

- Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1).
- Associated with the lives of persons important to local, California or national history (Criterion 2).
- Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values (Criterion 3).
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (Criterion 4).

For resources included on the Register of Historic Resources, environmental review may be required under CEQA if property is threatened by a project. Additionally, local building inspectors must grant code alternatives provided under State Historical Building Code. Further, the local assessor may enter into contract with property owner for property tax reduction pursuant to the Mills Act. A property owner also may place his or her own plaque or marker at the site of the resource.

Consent of owner is not required, but a resource cannot be listed over an owner's objections. The State Historical Resources Commission (SHRC) can, however, formally determine a property eligible for the California Register if the resource owner objects.

*3. Traditional Tribal Cultural Places Act (Senate Bill 18, "SB 18")*

Senate Bill 18 (SB 18) requires local (city and county) governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places ("cultural places") through local land use planning. SB 18 also requires the Governor's Office of Planning and Research (OPR) to include in the General Plan Guidelines advice to local governments for how to conduct these consultations.

The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government.

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code § 65300 et seq.) and specific plans (defined in Government Code § 65450 et seq.). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, existing state planning law requires local governments to use the same processes for adoption and amendment of specific plans as for general plans (see Government Code § 65453). Therefore, where SB 18 requires consultation and/or notice for a general plan adoption or amendment, the requirement extends also to a specific plan adoption or amendment.

*4. Assembly Bill 52 (AB 52)*

California Assembly Bill 52 (AB 52) (2014) Chapter 532 amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved on September 25, 2014. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process.

The Public Resources Code now establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." (Pub. Resources Code, § 21084.2.) To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (Pub. Resources Code, § 21080.3.1.)

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. Public Resources Code Section 21084.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources. These rules apply to projects that have a notice of preparation for an environmental impact report or negative declaration or mitigated negative declaration filed on or after July 1, 2015.

Public Resources Code Section 21074 defines "tribal cultural resources." In brief, in order to be considered a "tribal cultural resource," a resource must be either:

(1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or

(2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource.

In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources. In applying those criteria, a lead agency must consider the value of the resource to the tribe.

*5. State Health and Safety Code*

California Health and Safety Code (HSC) Section 7050.5(b) requires that excavation and disturbance activities must cease "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery…" until the coroner can determine regarding the circumstances, manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the code makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. Section 7051 specifies that the removal of human remains from "internment or a place of storage while awaiting internment" with the intent to sell them or to dissect them with "malice or wantonness" is a public offense punishable by imprisonment in a state prison. Lastly, HSC Sections 8010-8011 establish the California Native American Graves Protection and Repatriation Act consistent with the federal law addressing the same. The Act stresses that "all California Indian human remains and cultural items are to be treated with dignity and respect." It encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California. It also outlines the need for aiding California Indian tribes, including non-federally recognized tribes, in filing repatriation claims.

*6. California Code of Regulations Section 15064.5*

The California Code of Regulations, Title 14, Chapter 3, Section 15064.5 (the State CEQA Guidelines) establishes the procedure for determining the significance of impacts to archaeological and historical resources, as well as classifying the type of resource. Cultural resources are aspects of the environment that require identification and assessment for potential significance. The evaluation of cultural resources under CEQA is based upon the definition of a "historical resource" provided in CEQA Guidelines Section 15064.5, as follows:

*(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, § 4850 et seq.).*

*(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.*

*(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:*

*a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;*

*b. Is associated with the lives of persons important in our past;*

*c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or*

*d. Has yielded, or may be likely to yield, information important in prehistory or history.*

*(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.*

## C. Local Regulations

*1. Ordinance No. 578 – Establishment of Historic Preservation Districts*

This ordinance is intended to facilitate the preservation of areas deemed historically important to the County of Riverside. The ordinance specifies that a Historic Preservation District may be established if the Riverside County Board of Supervisors adopts a resolution that includes the boundaries of the Historic Preservation

District and finds that the proposed Historic Preservation District is in conformity with the Cultural and Paleontological section of the Multipurpose Open Space Element of the Riverside County General Plan. It must also find that, for the county, state or nation: the area exemplifies or reflects significant aspects of the cultural, political, economic or social history; the area is identified with historic personages or with important events in history; or, that the area embodies the distinguishing characteristics of a significant architectural period which is inherently valuable for the study of architecture unique to the history of the county, state or nation. (Riverside County, 2015, p. 4.9-25)

Under this ordinance, no building or structure within the boundaries of an adopted Historic Preservation District can be constructed or altered, except in strict compliance with the plans approved in conjunction with the issuance of a Historic District Alteration Permit by the Riverside County Planning Director. The ordinance also outlines how such certificates are to be reviewed and processed in order to preserve the "historical significance and related construction theme" of the Historic District. (Riverside County, 2015, p. 4.9-26)

*2. Riverside County Historic Preservation Commission*

The Riverside County Historical Commission was established in 2005 to advise the Board of Supervisors on historical preservation matters. It is tasked with working to discover and identify persons, events and places of historical importance within Riverside County, and to make recommendations relating to the preservation of appropriate historic sites and structures. To accomplish this, the Commission established criteria and procedures to identify and recognize historic landmarks in Riverside County. These criteria should be used when reviewing a potentially historically or culturally significant site that could be affected by the proposed development. Such resources are noted in the countywide list provided in Table 4.9-A of Riverside County EIR No. 521. (Riverside County, 2015, p. 4.9-26)

*3. Riverside County Planning Department Procedures*

The Riverside County Archeologist reviews all proposed land use projects subject to CEQA and not otherwise deemed categorically exempt. The Riverside County Archeologist reviews various internal databases for information that might pertain to the age of any buildings found on site, grading permits, ground disturbance activities and building permits. Where buildings are 45 years or older, the project applicant is required to perform an architectural history evaluation to assess potential historic value as part of a Phase I Cultural Resources study. When the study is completed, and if historic-period resources were identified during a survey, a copy of the report is transmitted to the Riverside County Historic Preservation Officer (CHPO) for review and comment. The CHPO sends relevant comments back to the Riverside County Archeologist. (Riverside County, 2015, p. 4.9-26)

Vacant parcels within areas known to have prehistoric or historic resources trigger a Phase I Cultural Resources study. Similarly, any parcels with environmental, geomorphological or vegetative features known to increase the likelihood of cultural resources being present trigger a "Phase I" cultural resources study. Such studies are required to follow the reporting formula found on the Riverside County Planning

Department's website which mirror the recommendations published by the State Historic Preservation Office (SHPO) in 1987. (Riverside County, 2015, p. 4.9-26)

The Riverside County Archeologist reviews all Phase I cultural resources studies for completeness and reasonable conclusions based on current industry standards in archeology. The Phase I study serves to advise the Riverside County Archeologist on matters relating to any identified prehistoric or historic resources, provide the requisite information to complete the project-related CEQA analysis and guide the Riverside County Archeologist in determining which land use conditions of approval and/or mitigation measures apply to the proposed project. (Riverside County, 2015, p. 4.9-26)

Copies of studies are provided to tribes, upon their request, as a confidential document. If a proposed project is subject to the requirements of the Traditional Tribal Places Act (commonly referred to as Senate Bill 18), a Phase 1 report is forwarded to tribes who request it as part of consultation under SB 18. Typically, official tribal consultations are scheduled after the report has been sent to the tribe(s) to maximize consultation efforts. (Riverside County, 2015, p. 4.9-26)

### 4.5.3 Basis for Determining Significance

Section V of Appendix G to the State CEQA Guidelines addresses typical adverse effects to cultural resources, and includes the following threshold questions to evaluate the Project's impacts on cultural resources:

- *Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?*
- *Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?*
- *Would the Project disturb any human remains, including those interred outside of formal cemeteries?*

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

a. *Alter or destroy an historic site;*
b. *Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, § 15064.5;*
c. *Alter or destroy an archaeological site;*
d. *Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, § 15064.5;*

*e. Disturb any human remains, including those interred outside of formal cemeteries.*

The significance thresholds set forth in the Riverside County's Environmental Assessment Checklist form, as modified by the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on cultural resources.

### 4.5.4 Impact Analysis

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| **Threshold a:** | **Would the Project alter or destroy an historic site?** |
| **Threshold b:** | **Would the Project cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, Section 15064.5?** |

Under existing conditions, the Project site is undeveloped and there are no structures located on-site. Based on the results of the Project's 2021 CRA (*Technical Appendix D1*) and 2024 CRA Update, the Project site includes one historic feature (Temp-1) and one previously recorded resource (P-33-011258), while no resources were identified in the off-site impact areas.

Based upon the Project's proposed impact limits, Site P-33-011258 may be directly impacted by the proposed development. Site P-33-011258 is a previously-recorded historic site that consists of a concentration of miscellaneous historic objects covering an area measuring approximately 10 meters in diameter. Cultural materials identified as part of the refuse scatter included graniteware, a wash basin, cans, glass, sheet metal, fencing, wire, and farm machinery. Given the low frequency of materials, the site appears to be a single-episode dumping location. Further analysis of Site P-33-011258 in 2009 evaluated the resource as not significant and not eligible for listing on the CRHR. Because Site P-33-011258 has been previously evaluated as not significant, Project impacts to Site P-33-011258 would be less than significant. (BFSA, 2021, pp. 4.0-6 and 4.0-9)

Site Temp-1 was identified as a historic concrete wildlife guzzler constructed between 1938 and 1967 (based upon historic aerial photographs). Due to the nature of the historic feature associated with Site Temp-1 and the lack of additional cultural constituents related to the feature, no subsurface testing was conducted at the site and the documentation of this site has exhausted any further research potential. Site Temp-1 contains no additional research value, has no associated cultural materials, is not clearly associated with any historically noteworthy individuals or events, and, therefore, does not meet the significance criteria thresholds provided in CEQA and is not considered eligible for listing on the CRHR. No additional archaeological study is recommended for the resource. Furthermore, Site Temp-1 occurs within areas planned for open space as part of the Project, and no direct impacts to Site Temp-1 would occur with implementation of the Project. Accordingly, Project impacts to Site Temp-1 would be less than significant. (BFSA, 2021, pp. 4.0-3 through 4.0-6 and 5.0-1)

Accordingly, and based on the analysis presented in the Project's 2021 CRA and 2024 CRA Update, implementation of the proposed Project would not alter or destroy a historic site or cause a substantial adverse change in the significance of a historical resource pursuant to California Code of Regulations Section 15064.5, either on site or off site within proposed off-site improvement areas. However, the potential

for the Project area to contain unidentified subsurface resources is considered high. Thus, there is a potential that historical resources may be uncovered during on- or off-site grading or ground-disturbing activities. This is evaluated as a potentially significant impact for which mitigation would be required.

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| **Threshold c:** | **Would the Project alter or destroy an archaeological site?** |
| **Threshold d:** | **Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations, Section 15064.5?** |

As previously indicated, there were no prehistoric archaeological resources identified on the Project site or within the off-site improvement areas. As such, the Project would not result in any impacts to known archaeological resources. Although impacts to known archaeological resources on the Project site and off-site improvement areas would be less than significant, both the Project site and off-site improvement areas have the potential to contain unidentified archaeological resources. Given the presence of previously-identified archaeological resources within the Project vicinity, there is a potential for the Project site or off-site improvement areas to contain unidentified surface or subsurface archaeological resources. Therefore, Project impacts to previously-undiscovered archaeological resources that may occur in the on- or off-site impact areas of the proposed Project would be significant prior to mitigation.

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| **Threshold e:** | **Would the Project disturb any human remains, including those interred outside of formal cemeteries?** |

The Project site does not contain a cemetery and no known cemeteries are located within the immediate site vicinity. Field surveys conducted on the Project site by BFSA did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site. Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction.

If human remains are unearthed during Project construction, the construction contractor would be required by law to comply with California Health and Safety Code, § 7050.5, "Disturbance of Human Remains." According to § 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact the Native American Heritage Commission (NAHC) by telephone within 24 hours. Pursuant to California Public Resources Code § 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code § 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to

the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials. Mandatory compliance with the applicable provisions of California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et. seq. would ensure that Project impacts to human remains would be less than significant.

### 4.5.5 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within western Riverside County. This study area was selected for evaluation because it encompasses a broad region with similar geological, biological, and climatic conditions.

As noted above under Thresholds a. and b., the Project site includes two historical sites (Site P-33-011258 and Site Temp-1), with no resources identified in the off-site improvement areas. However, none of these resources are considered eligible for listing in the CRHR. As such, Project impacts to previously-identified cultural resources would be less than significant on a cumulatively-considerable basis. However, there is a possibility that previously-undiscovered subsurface historical resources may be impacted by development of the Project as proposed. Other developments envisioned with buildout of the Riverside County General Plan and the general plans of cities within the County also have the potential to result in impacts to historical sites or resources, including sites or resources that may be buried beneath the ground surface. As such, the Project's potential impacts to previously-undiscovered historical resources on the Project site and off-site improvement areas would be cumulatively considerable prior to mitigation.

As discussed under the analysis of Thresholds c. and d., the Project's 2021 CRA (*Technical Appendix D1*) and 2024 CRA Update (*Technical Appendix D2*) did not identify any potentially significant archaeological resources or sites within the Project site or off-site improvement areas; thus, the Project would not result in any cumulatively-considerable impacts to known archaeological sites and would not cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulation, Section 15064.5. However, there is a possibility that previously-undiscovered subsurface archaeological resources may be impacted by development of the Project as proposed. Other cumulative developments resulting from buildout of the Riverside County General Plan and the general plans of cities within the County also have the potential to result in impacts to archaeological sites or resources, including sites or resources that may be buried beneath the ground surface. As such, the Project's potential impacts to archaeological sites or resources would be cumulatively considerable prior to mitigation.

As discussed under Threshold e., the Project and other cumulative developments would be subject to compliance with the provisions of California Health and Safety Code § 7050.5 as well as Public Resources Code § 5097 et. seq., which require the appropriate treatment of human remains. Mandatory compliance with State law would ensure that Project impacts to human remains would be less than significant on a cumulatively-considerable basis.

### 4.5.6 Significance of Impacts Before Mitigation

Threshold a. & b.: Significant Direct and Cumulatively-Considerable Impact. Although no significant historical resources, as defined by the CRHR and CEQA, were identified as part of the Project's CRA on site or within the Project's off-site improvement areas, there is a potential for previously-undiscovered historical resources to occur beneath the surface of areas planned for physical impact (i.e., grading) as part of the Project. Potential impacts to previously-undiscovered historical resources on site or within the off-site improvement areas would be significant on both a direct and cumulatively-considerable basis prior to mitigation.

Threshold c. & d.: Significant Direct and Cumulatively-Considerable Impact. The Project would not impact any known archaeological sites and would not cause a substantial adverse change in the significance of any known archaeological resources pursuant to California Code of Regulation, Section 15064.5. However, there is a possibility that previously-undiscovered subsurface archaeological resources may be impacted by development of the Project as proposed. Therefore, Project impacts to previously-undiscovered archaeological resources that may occur in the on- or off-site impact areas of the proposed Project would be significant prior to mitigation.

Threshold e.: Less-than-Significant Impact. The Project site and off-site improvement areas do not contain a cemetery and no known cemeteries are located within the immediate site vicinity. Additionally, the Project Applicant would be required to comply with the applicable provisions of California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et. seq., which would ensure that any human remains discovered on site are appropriately treated. Mandatory compliance with State law would ensure that Project impacts to human remains would be less than significant.

### 4.5.7 Regulations, Design Requirements, and Mitigation

***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.

***Mitigation***

MM 4.5-1 **015 – Planning-CUL: Artifact Disposition.** In the event cultural resources are identified during ground disturbing activities, the landowner(s) shall relinquish ownership of all cultural resources and provide evidence to the satisfaction of the County Archaeologist that all 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), have been handled through the following methods. Any artifacts identified and collected during construction grading activities are not to leave the project area and shall remain onsite in a secure location until final disposition. 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), have been 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. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. Prehistoric and/or Tribal Cultural Resources One of the following treatments shall be applied. Preservation in-place, if feasible is the preferred option. 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. Reburial of the resources on the Project property. The measures for reburial shall be culturally appropriate as determined through consultation with the consulting Tribe(s)and include, at least, the following: Measures to protect the reburial area from any future impacts in perpetuity. Reburial shall not occur until all required cataloguing (including a complete photographic record) and analysis have been completed on the cultural resources, with the exception that sacred and ceremonial items, burial goods, and Native American human remains are excluded. No cataloguing, analysis, or other studies may occur on human remains grave goods, and sacred and ceremonial items. Any reburial processes shall be culturally

appropriate and approved by the consulting tribe(s). 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. Human Remains Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner 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 with the property owner concerning the treatment of the remains and any associated items as provided in Public Resources Code Section 5097.98.

MM 4.5-2 **015 – Planning-CUL: 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 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 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. 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 4.5-3 **015 – Planning-CUL: Phase IV Cultural 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 Monitoring Plan.

MM 4.5-4 **015 – Planning-CUL: Project Archaeologist/Monitor.** 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 coordination with the consulting tribe(s) that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural, tribal cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources 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 4.5-5 **015 – Planning-CUL: 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 cultural resources* are discovered, the following procedures shall be followed: All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the Project archaeologist shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal 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. 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 condition, as being a feature and/or three or more artifacts in close association with each other. Tribal Cultural Resources are also considered cultural resources.

** If not already employed by the project developer, a County approved archaeologist and a Native American Monitor from the consulting tribe(s) 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.

MM 4.5-6 **Preconstruction Meeting**: The Archaeological Monitor shall be invited to a preconstruction meeting with construction personnel and County and tribal representatives. The attending archaeologist shall review the provisions of the CRMP and answer any applicable questions.

MM 4.5-7 **Construction Monitoring**: Full-time monitoring shall occur throughout the entire Project area, including all off-site improvement areas, during ground-disturbing activities. Full-time monitoring shall continue until the Archaeological Monitor required pursuant to Mitigation Measure MM 4.5-4 determines that the overall sensitivity of the Project area has been reduced from high to low as a result of mitigation monitoring. Should the monitor(s) determine that there are no cultural resources within the Project site or off-site improvement areas, or should the sensitivity be reduced to low during monitoring, all monitoring shall cease.

### 4.5.8 Significance of Impacts After Mitigation

Thresholds a. and b.: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measures MM 4.5-1 through MM 4.5-7 would ensure that any historical resources identified on site or within the Project's off-site improvement areas during ground-disturbing activities are appropriately treated, including if necessary curation of the historical artifact(s) at the Western Science Center in Hemet or as directed by the County Archaeologist. Implementation of the required mitigation would ensure that any potential impacts to subsurface historical sites or resources would be reduced to less-than-significant levels.

Thresholds c. and d.: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measures MM 4.5-1 through MM 4.5-7 would ensure that any archaeological sites or resources identified on site or within the Project's off-site improvement areas during ground-disturbing activities are appropriately treated as directed by the Archaeological Monitor, County Archaeologist, and Native American Monitor. Implementation of the required mitigation would reduce the Project's potential impacts to subsurface archaeological sites or resources to below a level of significance.

### 4.5.9 References


| Cited As | Reference |
|---|---|
| BFSA, 2021 | Brian F. Smith and Associates ("BFSA"), *A Phase I Cultural Resources Assessment for the Renaissance Ranch Project*. November 3, 2021. |
| BFSA, 2024 | Brian F. Smith and Associates ("BFSA"), *Cultural Resources Update Assessment for the Keller Crossing Project*. August 12, 2024. |
| Riverside County, 2015 | *Riverside County Draft Environmental Impact Report No. 521*. February 2015. Accessed: September 13, 2021. Available on-line at: |

| Cited As | Reference |
| --- | --- |
| | https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015. |

# 4.6 ENERGY

This Subsection is based in part on the information contained in the Project's Energy Analysis Report, titled "Keller Crossing Specific Plan Energy Analysis" (herein, "EA"), dated February 17, 2026, and appended to this EIR as *Technical Appendix E* (Urban Crossroads, 2026b). Refer to Section 7.0, *References*, for a complete list of reference sources.

## 4.6.1 Existing Conditions

### A. Overview

The most recent data for California's estimated total energy consumption and natural gas consumption is from 2022 and 2023, released by the United States (U.S.) Energy Information Administration's (EIA) California State Profile and Energy Estimates and includes (Urban Crossroads, 2026b, p. 7):

- As of 2022, approximately 6,882 trillion British Thermal Unit (BTU) of energy was consumed
- As of 2022, approximately 628 million barrels of petroleum
- As of 2023, approximately 2,085 billion cubic feet of natural gas
- As of 2023, approximately 1,227 thousand short tons of coal

According to the EIA, in 2022 the U.S. petroleum consumption comprised about 90% of all transportation energy use, excluding fuel consumed for aviation and most marine vessels. In 2023, about 253,289 million gallons (or about 6.031 million barrels) of finished petroleum products were consumed in the U.S., an average of about 694 million gallons per day (or about 16.5 million barrels per day). In 2021, California consumed approximately 12,157 million gallons in motor gasoline (33.31 million per day) and approximately 3,541 million gallons of diesel fuel (9.7 million per day). (Urban Crossroads, 2026b, p. 7)

The most recent data provided by the EIA for energy use in California is reported from 2022 and provided by demand sectors as follows (Urban Crossroads, 2026b, p. 7):

- 42.6% for transportation uses
- 22.5% for industrial uses
- 17.6% for residential uses
- 17.4% for commercial uses

According to the EIA, California used approximately 239,480 million kilowatt hours (kWh) of electricity in 2023. By sector in 2023, residential uses utilized 34.6% of the State's electricity, followed by 47.2% for commercial uses, 18.0% for industrial uses, and 0.3% for transportation. Electricity usage in California for differing land uses varies substantially by the type of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. (Urban Crossroads, 2026b, p. 7)

According to the EIA, California used approximately 21,036 million therms of natural gas in 2023. In 2023 (the most recent year for which data is available), by sector, industrial uses utilized 31.6% of the State's natural gas, followed by 31.3% used as fuel in the electric power sector, 22.8% from residential, 12.7% from commercial, 1.5% from transportation uses, and the remaining 3% was utilized for the operations, processing, and production of natural gas itself. While the supply of natural gas in the United States and production in the lower 48 states has increased greatly since 2008, California produces little, and imports 90% of its supply of natural gas. (Urban Crossroads, 2026b, pp. 7-8)

In 2023, total system electric generation for California was 281,140 gigawatt hours (GWh). California's massive electricity in-State generation system generated approximately 215,623 GWh which accounted for approximately 76% of the electricity it uses; the rest was imported from the Pacific Northwest (6%) and the U.S. Southwest (18%). Natural gas is the main source for electricity generation at 43.68% of the total in-State electric generation system power as shown in Table 4.6-1, *Total Electricity System Power (California 2023)*. (Urban Crossroads, 2026b, p. 8)

**Table 4.6-1 Total Electricity System Power (California 2023)**

| Fuel Type | California In-State Generation (GWh) | % of California In-State Generation | Northwest Imports (GWh) | Southwest Imports (GWh) | Total Imports (GWh) | Total California Energy Mix (GWh) | Total California Power Mix |
|---|---|---|---|---|---|---|---|
| Coal | 257 | 0.12% | 163 | 4,561 | 4,724 | 4,981 | 1.77% |
| Natural Gas | 94,192 | 43.68% | 52 | 8,530 | 8,582 | 102,774 | 36.56% |
| Oil | 36 | 0.02% | 0 | 0 | 0 | 36 | 0.01% |
| Other (Waste Heat/Petroleum Coke) | 206 | 0.10% | 0 | 0 | 0 | 206 | 0.07% |
| Unspecified | 0 | 0.00% | 100 | 10,273 | 10,373 | 10,373 | 3.69% |
| ***Total Thermal and Unspecified*** | ***94,690*** | ***43.91%*** | ***316*** | ***23,363*** | ***23,679*** | ***118,370*** | ***42.10%*** |
| Nuclear | 17,714 | 8.22% | 196 | 8,361 | 8,558 | 26,272 | 9.34% |
| Large Hydro | 27,066 | 12.55% | 4,712 | 1,109 | 5,821 | 32,886 | 11.70% |
| Biomass | 5,037 | 2.34% | 753 | - | 753 | 5,790 | 2.06% |
| Geothermal | 10,999 | 5.10% | 221 | 2,347 | 2,569 | 13,567 | 4.83% |
| Small Hydro | 4,853 | 2.25% | 133 | 2 | 135 | 4,988 | 1.77% |
| Solar | 41,344 | 19.17% | 417 | 6,108 | 6,525 | 47,869 | 17.03% |
| Wind | 13,920 | 6.46% | 9,177 | 8,302 | 17,479 | 31,399 | 11.17% |
| Total Non-GHG and Renewable Resources | 120,932 | 56.09% | 15,609 | 26,229 | 41,838 | 162,771 | 57.90% |
| ***SYSTEM TOTALS*** | ***215,623*** | ***100.00%*** | ***15,925*** | ***49,593*** | ***65,518*** | ***281,140*** | ***100.00%*** |

(Urban Crossroads, 2026b, Table 2-1)

An updated summary of, and context for energy consumption and energy demands within the State is presented in "U.S. Energy Information Administration, California State Profile and Energy Estimates, Quick Facts" excerpted below (Urban Crossroads, 2026b, p. 8):

- In 2023, California was the seventh-largest producer of crude oil among the 50 states, and the State ranked third in crude oil refining capacity.
- California is the largest consumer of jet fuel and second-largest consumer of motor gasoline among the 50 states.
- California is the second-largest total energy consumer among the states, after Texas, but its per capita energy consumption is the fourth-lowest in the nation.
- In 2023, renewable resources, including hydroelectric power and small-scale solar power, supplied 54% of California's in-State electricity generation. Natural gas fueled another 39% and nuclear power provided almost all the rest.
- In 2023, California was the fourth-largest electricity producer in the nation. It is also the nation's third-largest electricity consumer and imports more electricity than any other state.

As indicated above, California is one of the nation's leading energy-producing states, and California's per capita energy use is among the nation's most efficient. Given the nature of the Project, the remainder of this discussion will focus on the three sources of energy that are most relevant to the Project: namely, electricity, natural gas, and transportation fuel for vehicle trips associated with the uses planned for the Project. (Urban Crossroads, 2026b, p. 8)

### B. Electricity

The Southern California region's electricity reliability has been of concern for the past several years due to the planned retirement of aging facilities that depend upon once-through cooling technologies, as well as the June 2013 retirement of the San Onofre Nuclear Generating Station (San Onofre). While the once-through cooling phase-out has been ongoing since the May 2010 adoption of the State Water Resources Control Board's once-through cooling policy, the retirement of San Onofre complicated the situation. California ISO studies revealed the extent to which the South California Air Basin (SCAB) and the San Diego Air Basin (SDAB) region were vulnerable to low-voltage and post-transient voltage instability concerns. A preliminary plan to address these issues was detailed in the 2013 Integrated Energy Policy Report (IEPR) after a collaborative process with other energy agencies, utilities, and air districts. Similarly, the subsequent 2023 IEPR provides information and policy recommendations on advancing a clean, reliable, and affordable energy system. (Urban Crossroads, 2026b, p. 10)

California's electricity industry is an organization of traditional utilities, private generating companies, and State agencies, each with a variety of roles and responsibilities to ensure that electrical power is provided to consumers. The California ISO is a nonprofit public benefit corporation and is the impartial operator of the State's wholesale power grid and is charged with maintaining grid reliability, and to direct uninterrupted electrical energy supplies to California's homes and communities. While utilities still own transmission assets, the ISO routes electrical power along these assets, maximizing the use of the transmission system and its power generation resources. The ISO matches buyers and sellers of electricity to ensure that enough

power is available to meet demand. To these ends, every five minutes the ISO forecasts electrical demands, accounts for operating reserves, and assigns the lowest cost power plant unit to meet demands while ensuring adequate system transmission capacities and capabilities. (Urban Crossroads, 2026b, p. 10)

Part of the ISO's charge is to plan and coordinate grid enhancements to ensure that electrical power is provided to California consumers. To this end, utilities file annual transmission expansion/modification plans to accommodate the State's growing electrical needs. The ISO reviews and either approves or denies the proposed additions. In addition, and perhaps most importantly, the ISO works with other areas in the western United States electrical grid to ensure that adequate power supplies are available to the State. In this manner, continuing reliable and affordable electrical power is assured to existing and new consumers throughout the State. (Urban Crossroads, 2026b, p. 10)

Electricity is currently provided to the Project site by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. Based on SCE's 2023 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-State suppliers. (Urban Crossroads, 2026b, p. 10)

Table 4.6-2, *SCE 2023 Power Content Mix*, shows SCE's specific proportional shares of electricity sources in 2023. As indicated in Table 4.6-2, the 2023 SCE Power Mix has renewable energy at 36.9% of the overall energy resources. Geothermal resources are at 4.8%, wind power is at 11.2%, large hydroelectric sources are at 11.7%, solar energy is at 17.0%, and coal is at 1.8%. (Urban Crossroads, 2026b, pp. 10-11)

### C. Natural Gas

The following summary of natural gas customers and volumes, supplies, delivery of supplies, storage, service options, and operations is excerpted from information provided by the California Public Utilities Commission (CPUC) (Urban Crossroads, 2026b, pp. 11-14):

> *"The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from Pacific Gas and Electric (PG&E), Southern California Gas (SoCalGas), San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller natural gas utilities. The CPUC also regulates independent storage operators: Lodi Gas Storage, Wild Goose Storage, Central Valley Storage and Gill Ranch Storage.*
>
> *California's natural gas utilities provide service to over 11 million gas meters. SoCalGas and PG&E provide service to about 5.9 million and 4.3 million customers, respectively, while SDG&E provides service to over 800, 000 customers. In 2018, California gas utilities forecasted that they would deliver about 4740 million cubic feet per day (MMcfd) of gas to their customers, on average, under normal weather conditions.*

**Table 4.6-2 SCE 2023 Power Content Mix**

| Energy Resources | 2023 SCE Power Mix |
|---|---|
| ***Eligible Renewable*** | **36.9%** |
| Biomass & Waste | 2.1% |
| Geothermal | 4.8% |
| Eligible Hydroelectric | 1.8% |
| Solar | 17.0% |
| Wind | 11.2% |
| ***Coal*** | **1.8%** |
| ***Large Hydroelectric*** | **11.7%** |
| ***Natural Gas*** | **36.6%** |
| ***Nuclear*** | **9.3%** |
| ***Other*** | **0.1%** |
| Unspecified Sources of power* | 3.7% |
| **Total** | **100%** |

* "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources

(Urban Crossroads, 2026b, Table 2-2)

*The overwhelming majority of natural gas utility customers in California are residential and small commercials customers, referred to as "core" customers. Larger volume gas customers, like electric generators and industrial customers, are called "noncore" customers. Although very small in number relative to core customers, noncore customers consume about 65% of the natural gas delivered by the state's natural gas utilities, while core customers consume about 35%.*

*A significant amount of gas (about 19%, or 1131 MMcfd, of the total forecasted California consumption in 2018) is also directly delivered to some California large volume consumers, without being transported over the regulated utility pipeline system. Those customers, referred to as "bypass" customers, take service directly from interstate pipelines or directly from California producers.*

*SDG&E and Southwest Gas' southern division are wholesale customers of SoCalGas, i.e., they receive deliveries of gas from SoCalGas and in turn deliver that gas to their own customers. (Southwest Gas also provides natural gas distribution service in the Lake Tahoe area.) Similarly, West Coast Gas, a small gas utility, is a wholesale customer of PG&E. Some other wholesale customers are municipalities like the cities of Palo Alto, Long Beach, and Vernon, which are not regulated by the CPUC.*

*Natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. The major interstate pipelines that deliver out-ofstate natural gas to California*

*gas utilities are Gas Transmission Northwest Pipeline, Kern River Pipeline, Transwestern Pipeline, El Paso Pipeline, Ruby Pipeline, Mojave Pipeline, and Tuscarora. Another pipeline, the North Baja - Baja Norte Pipeline takes gas off the El Paso Pipeline at the California/Arizona border and delivers that gas through California into Mexico. While the Federal Energy Regulatory Commission (FERC) regulates the transportation of natural gas on the interstate pipelines, and authorizes rates for that service, the California Public Utilities Commission may participate in FERC regulatory proceedings to represent the interests of California natural gas consumers.*

*The gas transported to California gas utilities via the interstate pipelines, as well as some of the California-produced gas, is delivered into the PG&E and SoCalGas intrastate natural gas transmission pipelines systems (commonly referred to as California's "backbone" pipeline system). Natural gas on the utilities' backbone pipeline systems is then delivered to the local transmission and distribution pipeline systems, or to natural gas storage fields. Some large volume noncore customers take natural gas delivery directly off the high-pressure backbone and local transmission pipeline systems, while core customers and other noncore customers take delivery off the utilities' distribution pipeline systems. The state's natural gas utilities operate over 100,000 miles of transmission and distribution pipelines, and thousands more miles of service lines.*

*Bypass customers take most of their deliveries directly off the Kern/Mojave pipeline system, but they also take a significant amount of gas from California production.*

*PG&E and SoCalGas own and operate several natural gas storage fields that are located within their service territories in northern and southern California, respectively. These storage fields, and four independently owned storage utilities - Lodi Gas Storage, Wild Goose Storage, Central Valley Storage, and Gill Ranch Storage - help meet peak seasonal and daily natural gas demand and allow California natural gas customers to secure natural gas supplies more efficiently. PG&E is a 25% owner of the Gill Ranch Storage field. These storage fields provide a significant amount of infrastructure capacity to help meet California's natural gas requirements, and without these storage fields, California would need much more pipeline capacity in order to meet peak gas requirements.*

*Prior to the late 1980s, California regulated utilities provided virtually all natural gas services to all their customers. Since then, the Commission has gradually restructured the California gas industry in order to give customers more options while assuring regulatory protections for those customers that wish to, or are required to, continue receiving utility provided services.*

*The option to purchase natural gas from independent suppliers is one of the results of this restructuring process. Although the regulated utilities procure natural gas supplies for most core customers, core customers have the option to purchase natural gas from independent natural gas marketers, called "core transport agents" (CTA). Contact information for core transport agents can be found on the utilities' web sites. Noncore customers, on the other hand, make natural gas supply arrangements directly with producers or with marketers.*

*Another option resulting from the restructuring process occurred in 1993, when the Commission removed the utilities' storage service responsibility for noncore customers, along with the cost of this service from noncore customers' transportation rates. The Commission also encouraged the development of independent storage fields, and in subsequent years, all the independent storage fields in California were established. Noncore customers and marketers may now take storage service from the utility or from an independent storage provider (if available), and pay for that service, or may opt to take no storage service at all. For core customers, the Commission assures that the utility has adequate storage capacity set aside to meet core requirements, and core customers pay for that service.*

*In a 1997 decision, the Commission adopted PG&E's "Gas Accord", which unbundled PG&E's backbone transmission costs from noncore transportation rates. This decision gave customers and marketers the opportunity to obtain pipeline capacity rights on PG&E's backbone transmission pipeline system, if desired, and pay for that service at rates authorized by the Commission. The Gas Accord also required PG&E to set aside a certain amount of backbone transmission capacity in order to deliver gas to its core customers. Subsequent Commission decisions modified and extended the initial terms of the Gas Accord. The "Gas Accord" framework is still in place today for PG&E's backbone and storage rates and services and is now simply referred to as PG&E Gas Transmission and Storage (GT&S).*

*In a 2006 decision, the Commission adopted a similar gas transmission framework for Southern California, called the "firm access rights" system. SoCalGas and SDG&E implemented the firm access rights (FAR) system in 2008, and it is now referred to as the backbone transmission system (BTS) framework. As under the PG&E backbone transmission system, SoCalGas backbone transmission costs are unbundled from noncore transportation rates. Noncore customers and marketers may obtain, and pay for, firm backbone transmission capacity at various receipt points on the SoCalGas system. A certain amount of backbone transmission capacity is obtained for core customers to assure meeting their requirements.*

*Many if not most noncore customers now use a marketer to provide for several of the services formerly provided by the utility. That is, a noncore customer may simply arrange for a marketer to procure its supplies, and obtain any needed storage and backbone transmission capacity, in order to assure that it will receive its needed deliveries of natural gas supplies. Core customers still mainly rely on the utilities for procurement service, but they have the option to take procurement service from a CTA. Backbone transmission and storage capacity is either set aside or obtained for core customers in amounts to assure very high levels of service.*

*In order properly operate their natural gas transmission pipeline and storage systems, PG&E and SoCalGas must balance the amount of gas received into the pipeline system and delivered to customers or to storage fields. Some of these utilities' storage capacity is dedicated to this service, and under most circumstances, customers do not need to precisely match their deliveries with their consumption. However, when too much or too little gas is expected to be delivered into the utilities'*

*systems, relative to the amount being consumed, the utilities require customers to more precisely match up their deliveries with their consumption. And, if customers do not meet certain delivery requirements, they could face financial penalties. The utilities do not profit from these financial penalties - the amounts are then returned to customers as a whole. If the utilities find that they are unable to deliver all the gas that is expected to be consumed, they may even call for a curtailment of some gas deliveries. These curtailments are typically required for just the largest, noncore customers. It has been many years since there has been a significant curtailment of core customers in California."*

As indicated in the preceding discussions, natural gas is available from a variety of in-State and out-of-State sources and is provided throughout the State in response to market supply and demand. Complementing available natural gas resources, biogas may soon be available via existing delivery systems, thereby increasing the availability and reliability of resources in total. The CPUC oversees utility purchases and transmission of natural gas to ensure reliable and affordable natural gas deliveries to existing and new consumers throughout the State. (Urban Crossroads, 2026b, p. 14)

California accounts for less than 1% of total U.S. natural gas reserves and production. As with crude oil, California's natural gas production has experienced a gradual decline since 1985. In 2023, about 32% of the natural gas delivered to consumers went to the State's industrial sector, and about 31% was delivered to the electric power sector. Natural gas fueled more than two fifths of the State's utility-scale electricity generation in 2023. The residential sector, where three-fifths of California households use natural gas for home heating, accounted for 23% of natural gas deliveries. The commercial sector received 13% of the deliveries to end users and the transportation sector consumed the remaining 1%. (Urban Crossroads, 2026b, p. 14)

### D. Transportation Energy Resources

On January 1, 2024, the Department of Motor Vehicles (DMV) reported 35.7 million registered vehicles in California, which, based on data from the 2021 version of the EMissions FACtor (EMFAC) model, are estimated to consume approximately 17.5 billion gallons of fuel annually[1]. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the Project patrons and employees via commercial outlets. (Urban Crossroads, 2026b, p. 15)

California's on-road transportation system includes 396,616 lane miles, more than 26.6 million passenger vehicles and light trucks, and almost 9.0 million medium- and heavy-duty vehicles. While gasoline consumption has been declining since 2008 it is still by far the dominant fuel. California is the second-largest consumer of petroleum products, after Texas, and accounts for 8% of the nation's total consumption. The State is the largest U.S. consumer of motor gasoline and jet fuel, and 83% of the petroleum consumed in California is used in the transportation sector. (Urban Crossroads, 2026b, p. 15)

[1] Fuel consumptions estimated utilizing information from EMFAC2021.

## 4.6.2 Applicable Regulatory Requirements

### A. Federal Regulations

#### 1. *Intermodal Surface Transportation Efficiency Act (ISTEA)*

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of intermodal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions. The applicable MPO for the Riverside County is the Southern California Association of Governments (SCAG). SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is the applicable planning document for the area.

#### 2. *The Transportation Equity Act for the 21st Century (TEA-21)*

The TEA-21 was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety.

### B. State Regulations

#### 1. *Integrated Energy Policy Report*

Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and protect public health and safety (Public Resources Code § 25301a). The CEC prepares these assessments and associated policy recommendations every two years, with updates on alternate years, as part of the Integrated Energy Policy Report (IEPR).

The 2019 IEPR focuses on changes in its energy system to address climate change and improve air quality in order to ensure that all Californians share in the benefit of the state's clean energy future. The report provides an analysis of electricity sector trends, building decarbonization and energy efficiency, zero-emission vehicles, energy equity, climate change adaptation, electricity reliability in Southern California, natural gas technologies, and electricity, natural gas, and transportation energy demand forecasts. In response to SB 100, which calls for California's electricity system to become 100 percent zero-carbon by 2045, the CEC, California Public Utilities Commission (CPUC) and the California Air Resources Board (CARB) are leading the way to identify pathways to remove carbon from the state's electricity system. The

goal is to utilize the clean electricity system to eliminate the carbon from other portions of California's energy system.

### 2. *California Code Title 24, Part 6, Energy Efficiency Standards*

California Code of Regulations (CCR), Title 24, Part 6 (also referred to as the California Energy Code) was promulgated by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption. To these ends, the California Energy Code provides energy efficiency standards for residential and nonresidential buildings. California's building efficiency standards are updated on an approximately three-year cycle. The 2025 Standards for building construction, which went into effect on January 1, 2026, improved upon the former 2022 Standards for residential and nonresidential buildings. While the 2022 version introduced the first "electric-ready" requirements and expanded solar mandates, the 2025 update shifts the baseline for compliance to favor dual electric systems and more stringent efficiency metrics. The CEC estimates that the 2025 code will save $4.8 billion in energy costs and reduce greenhouse gas (GHG) emissions by 4 million metric tons over its lifetime. The 2025 Title 24 standards require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting standards for nonresidential buildings.

### 3. *California Renewable Portfolio Standards (RPS)*

The CEC implements and administers portions of California's Renewables Portfolio Standard (RPS). California's RPS has been progressively strengthened through a series of legislative actions. SB X1-2 (Simitian, Chapter 1, Statutes of 2011) established a 33% RPS by 2020. SB 350 (De León, Chapter 547, Statutes of 2015) increased the target to 50% by 2030, with interim milestones of 40% by 2024 and 45% by 2027. SB 100 (De León, Chapter 312, Statutes of 2018) further strengthened the RPS by requiring 50% renewable resources by December 31, 2026, and 60% by December 31, 2030, and established the State's policy that 100 percent of retail electricity sales be served by renewable and zero-carbon resources by December 31, 2045. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 52% of retail sales by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and California Air Resources Board (CARB) to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

### 4. *Pavley Fuel Efficiency Standards (AB 1493)*

California Assembly Bill 1493 ("Pavley Fuel Efficiency Standards"), enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Under this legislation, CARB adopted regulations to reduce GHG emissions from model year 2009-2016 non-commercial passenger vehicles (cars and light-duty trucks). Although aimed at reducing GHG emissions

specifically, a co-benefit of the Pavley standards is an improvement in fuel efficiency and consequently a reduction in fuel consumption.

#### 5. *Senate Bill 350 (SB 350) – Clean Energy and Pollution Reduction Act of 2015*

In October 2015, the legislature approved, and the Governor signed, SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024 and 45% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electricity transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

#### 6. State of California Energy Plan

The State Energy Plan, drafted by the CEC, identifies emerging trends in energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The plan recommends reductions in congestion and increased efficiency in the use of fuel supplies. The plan also encourages urban designs that reduce vehicle miles traveled (VMT) and promote pedestrian and bicycle access.

### C. Local Regulations

#### 1. *Riverside County Climate Action Plan*

The County of Riverside's most current Climate Action Plan, updated in November 2019 uses several methods to promote renewable energy and energy efficiency. The regulation most relevant to the project is R2-CE1: Clean Energy, which states:

> *Clean energy includes energy efficiency and clean energy supply options such as highly efficient combined heat and power as well as renewable energy sources. Installing solar photovoltaics panels on residential and commercial building rooftops is an effective way to produce renewable energy on-site. Moreover, when combined with energy storage systems, solar panels could continuously meet residential and commercial energy demand. The Riverside County Settlement Agreement requires that on-site renewable energy production (including but not limited to solar) shall apply to any tentative tract map, plot plan, or conditional use permit that proposes to add more than 75 new dwelling units of residential development or one or more new buildings totaling more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development. Renewable*

> *energy production shall be onsite generation of at least 20 percent of energy demand for commercial, office, industrial or manufacturing development, meet or exceed 20 percent of energy demand for multi-family residential development, and meet or exceed 30 percent of energy demand for single-family residential development. These renewable energy requirements should be updated with every CAP Update by the County based on most recent technology advancements*. (Riverside County, 2019a, pp. 4-11 and 4-12)

The County of Riverside also has several other non-mandatory regulations that would serve to benefit the Project. For example, CAP measure R2-L1, *Tree Planting for Shading and Energy Saving*, encourages residents and developers to plant trees to lower outdoor summer temperatures. CAP measure R2-L2, *Light Reflecting Surfaces for Energy Saving*, advocates for coating surfaces such as roofs and asphalt with substances that reflect sunlight, for example by painting them white or installing rooftop gardens.

### 4.6.3 Basis for Determining Significance

Section VI of Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects due to energy consumption, and includes the following threshold questions to evaluate a project's impacts on energy resources:

- *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*
- *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The following thresholds are derived directly from Section VI of Appendix G to the State CEQA Guidelines and the County's Environmental Assessment form. The proposed Project would have a significant impact on energy resources if construction and/or operation of the Project would:

a. *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or*

b. *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency*.

### 4.6.4 Impact Analysis

#### A. Methodology for Calculating Project Energy Demands

Information from the CalEEMod outputs from the Project's Air Quality Impact Analysis (herein, "AQIA"; included as *Technical Appendix B1*) was utilized in this analysis, detailing Project-related construction equipment, transportation energy demands, and facility energy demands. (Urban Crossroads, 2026b, p. 23)

#### 1. *CalEEMod*

The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases

updates, as such the latest version available at the time of this report has been utilized in this analysis. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources as well as energy usage. Accordingly, the latest version of CalEEMod has been used to determine the proposed Project's anticipated transportation and facility energy demands. Outputs from the annual model runs are provided in Appendices 4.1 and 4.5 of the Project's EA (*Technical Appendix E)*. (Urban Crossroads, 2026b, p. 23)

### 2. *Emission Factors Model*

On May 2, 2022, the EPA approved the 2021 version of the EMissions FACtor model (EMFAC) web database for use in State Implementation Plan and transportation conformity analyses. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on road mobile sources. This energy study utilizes the different fuel types for each vehicle class from the annual EMFAC2021 emission inventory in order to derive the average vehicle fuel economy which is then used to determine the estimated annual fuel consumption associated with vehicle usage during Project construction and operational activities. For purposes of analysis, the 2025 through 2030 analysis years were utilized to determine the average vehicle fuel economy used throughout the duration of the Project. Output from the EMFAC2021 model run is provided in Appendix 4.6 of the Project's EA (*Technical Appendix E)*. (Urban Crossroads, 2026b, pp. 23-24)

| | |
|---|---|
| **Threshold a:** | **Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?** |

The proposed Project has the potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources during both construction and long-term operation. Provided below is a discussion of the Project's construction- and operational-related energy demands.

## A. Construction Energy Demands

The focus within this section is the energy implications of the construction process, specifically the power cost from on-site electricity consumption during construction of the proposed Project (Urban Crossroads, 2026b, p. 24).

### 1. *Construction Power Cost and Electricity Usage*

Construction of the Project is expected to commence in October 2025 and would last through February 2027 for Off-Site, February 2027 through July 2027 for Phase 1 (In-Tract), July 2026 through December 2028 for Phase 1 (On-Site), and March 2026 through January 2030 for Phase 2. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet. Refer to EIR subsection 3.6.1 for a discussion of the anticipated duration of Project construction activities. (Urban Crossroads, 2026b, p. 24)

The 2025 National Construction Estimator identifies a typical power cost per 1,000 s.f. of building construction per month of $2.85, which was used to calculate the Project's total construction power cost. As shown on Table 4.6-3, *Construction Power Cost*, the total power cost of the on-site electricity usage during the construction of the Project is estimated to be approximately $120,504.61. The total Project construction electricity usage is the summation of the products of the power cost (estimated in Table 4.6-3) by the utility provider cost per kilowatt hour (kWh) of electricity. (Urban Crossroads, 2026b, p. 25)

**Table 4.6-3 Construction Power Cost**

| Phase | Land Use | Building Construction (in 1,000 sf) | Power Cost (in 1,000 sf) | Construction Duration (months) | Power Cost |
|---|---|---|---|---|---|
| 1 | Single Family Housing | $2.85 | 351.000 | 30 | $30,010.50 |
| | Multifamily (Low-Rise) Residential | $2.85 | 103.880 | 30 | $8,881.74 |
| ***PHASE 1 CONSTRUCTION POWER COST*** | | | | | ***$38,892.24*** |
| 2 | Single Family Housing | $2.85 | 397.800 | 46 | $52,151.58 |
| | Multifamily (Low-Rise) Residential | $2.85 | 139.920 | 46 | $18,343.51 |
| | Senior Adult Housing | $2.85 | 84.800 | 46 | $11,117.28 |
| ***PHASE 2 CONSTRUCTION POWER COST*** | | | | | ***$81,612.37*** |
| ***TOTAL CONSTRUCTION POWER COST*** | | | | | ***$120,504.61*** |

(Urban Crossroads, 2026b, Table 4-2)

The SCE's general service rate schedule was used to determine the Project's electrical usage. As of March 1, 2025, SCE's general service rate is $0.22 for residential services. As shown on Table 4.6-4, *Construction Electricity Usage*, the total electricity usage from on-site Project construction related activities is estimated to be approximately 554,478 kWh. (Urban Crossroads, 2026b, p. 25)

**Table 4.6-4 Construction Electricity Usage**

| Phase | Land Use | Cost per kWh | Project Construction Electricity Usage (kWh) |
|---|---|---|---|
| 1 | Single Family Housing | $0.22 | 138,087 |
| | Multifamily (Low-Rise) Residential | $0.22 | 40,868 |
| ***PHASE 1 CONSTRUCTION ELECTRICITY USAGE*** | | | ***178,955*** |
| 2 | Single Family Housing | $0.22 | 239,965 |
| | Multifamily (Low-Rise) Residential | $0.22 | 84,404 |
| | Senior Adult Housing | $0.22 | 51,154 |
| ***PHASE 2 CONSTRUCTION ELECTRICITY USAGE*** | | | ***375,523*** |
| ***TOTAL CONSTRUCTION ELECTRICITY USAGE*** | | | ***554,478*** |

(Urban Crossroads, 2026b, Table 4-3)

### 2. *Construction Equipment Fuel Estimates*

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction (refer to EIR subsection 3.6.1 for a discussion of the anticipated construction equipment that would be utilized during Project construction activities) (Urban Crossroads, 2026b, p. 26).

Project construction activity timeline estimates, construction equipment schedules, equipment power ratings, load factors, and associated fuel consumption estimates are presented in Table 4.6-5, *Construction Equipment Fuel Consumption Estimates*. The aggregate fuel consumption rate for all equipment is estimated at 18.5 horsepower hour per gallon (hp-hr-gal.), obtained from CARB 2018 Emissions Factors Tables and cited fuel consumption rate factors presented in Table D-24 of the Moyer guidelines. For the purposes of this analysis, the calculations are based on all construction equipment being diesel-powered which is consistent with industry standards. (Urban Crossroads, 2026b, p. 28)

Diesel fuel would be supplied by existing residential fuel providers serving the Project area and region. As presented in Table 4.6-5, Project construction activities would consume an estimated 442,752 gallons of diesel fuel. Project construction would represent a "single-event" diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose. (Urban Crossroads, 2026b, p. 28)

Construction Trips and Vehicle Miles Traveled (VMT)
Construction generates on-road vehicle emissions from vehicle usage for workers, hauling, and vendors commuting to and from the site. The number of workers, hauling, and vendor trips are presented below in Table 4.6-6, *Construction Trips and VMT*.

**3. *Construction Worker Fuel Estimates***

With respect to estimated VMT for the Project, the construction worker trips would generate an estimated 622,895 VMT during the 51 months of construction. Based on CalEEMod methodology, it is assumed that 50% of all vendor trips are from light-duty-auto vehicles (LDA), 25% are from light-duty-trucks (LDT1[2]), and 25% are from light-duty-trucks (LDT2[3]). Data regarding Project related construction worker trips were based on CalEEMod defaults utilized within the Project's AQIA (*Technical Appendix B1* to this EIR). (Urban Crossroads, 2026b, p. 31)

Vehicle fuel efficiencies for LDA, LDT1, and LDT2 were estimated using information generated within the 2021 version of the EMFAC developed by CARB. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, and VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. EMFAC2021 was run for the LDA, LDT1, and LDT2 vehicle class within the California sub-area for the 2025 through 2030 calendar years. Data from EMFAC2021 is shown in Appendix 4.6 of the Project's EA (*Technical Appendix E)*. (Urban Crossroads, 2026b, pp. 31-32)

[2] Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.
[3] Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

## Table 4.6-5 Construction Equipment Fuel Consumption Estimates

| Phase | Construction Activity | Duration (Days) | Equipment | HP Rating | Quantity | Usage Hours | Load Factor | HP-hrs/day | Total Fuel Consumption |
|---|---|---|---|---|---|---|---|---|---|
| Off-Site | Grading | 101 | Scrapers | 423 | 4 | 8 | 0.48 | 6,497 | 35,472 |
| | | | Rubber Tired Dozers | 367 | 1 | 8 | 0.4 | 1,174 | 6,412 |
| | Sewer, Drain, Water | 154 | Excavators | 36 | 2 | 8 | 0.38 | 219 | 1,822 |
| | | | Rubber Tires Loaders | 150 | 2 | 8 | 0.36 | 864 | 7,192 |
| | Utility Crossing | 26 | Tractors/Loaders/Backhoes | 84 | 2 | 8 | 0.37 | 497 | 699 |
| | Dry Utilities | 34 | Tractors/Loaders/Backhoes | 84 | 2 | 8 | 0.37 | 497 | 914 |
| | Curb, Gutter, Street Improvement | 66 | Grader | 148 | 1 | 8 | 0.41 | 485 | 1,732 |
| | | | Skid Steer Loader | 71 | 1 | 8 | 0.37 | 210 | 750 |
| | | | Scraper | 423 | 1 | 8 | 0.48 | 1,624 | 5,795 |
| ***OFF-SITE CONSTRUCTION FUEL DEMAND (GALLONS DIESEL FUEL)*** | | | | | | | | | ***60,787*** |
| 1 (In-Tract) | Sewer, Drain, Water | 63 | Excavators | 36 | 2 | 8 | 0.38 | 219 | 745 |
| | | | Rubber Tired Loaders | 150 | 2 | 8 | 0.36 | 864 | 2,942 |
| | Utility Sleeving | 10 | Tractors/Loaders/Backhoes | 84 | 2 | 8 | 0.37 | 497 | 269 |
| | Curb, Gutter, Street Improvement | 25 | Graders | 148 | 1 | 8 | 0.41 | 485 | 656 |
| | | | Skid Steer Loaders | 71 | 1 | 8 | 0.37 | 210 | 284 |
| | Dry Utilities | 30 | Tractors/Loaders/Backhoes | 84 | 2 | 8 | 0.37 | 497 | 806 |
| ***PHASE 1 (IN-TRACT) CONSTRUCTION FUEL DEMAND (GALLONS DIESEL FUEL)*** | | | | | | | | | ***5,703*** |
| 1 (On-Site) | Grading | 177 | Scrapers | 423 | 8 | 8 | 0.48 | 12,995 | 124,326 |
| | | | Rubber Tired Dozers | 367 | 5 | 8 | 0.4 | 5,872 | 56,181 |
| | Building Construction | 498 | Forklifts | 82 | 3 | 8 | 0.2 | 394 | 10,595 |
| | | | Generator Sets | 14 | 1 | 8 | 0.74 | 83 | 2,231 |
| | | | Cranes | 367 | 1 | 8 | 0.29 | 851 | 22,920 |
| | | | Welders | 46 | 1 | 8 | 0.45 | 166 | 4,458 |
| | | | Tractors/Loaders/Backhoes | 84 | 3 | 8 | 0.37 | 746 | 20,079 |
| | Paving | 75 | Pavers | 81 | 2 | 8 | 0.42 | 544 | 2,207 |
| | | | Paving Equipment | 89 | 2 | 8 | 0.36 | 513 | 2,078 |
| | | | Rollers | 36 | 2 | 8 | 0.38 | 219 | 887 |
| | Architectural Coating | 75 | Air Compressors | 37 | 1 | 8 | 0.48 | 142 | 576 |
| ***PHASE 1 (ON-SITE) CONSTRUCTION FUEL DEMAND (GALLONS DIESEL FUEL)*** | | | | | | | | | ***246,539*** |

## Table 4.6-5 Construction Equipment Fuel Consumption Estimates (Cont'd)

| Phase | Construction Activity | Duration (Days) | Equipment | HP Rating | Quantity | Usage Hours | Load Factor | HP-hrs/day | Total Fuel Consumption |
|---|---|---|---|---|---|---|---|---|---|
| 2 | Building Construction | 1002 | Forklifts | 82 | 3 | 8 | 0.2 | 394 | 21,318 |
| | | | Generator Sets | 14 | 1 | 8 | 0.74 | 83 | 4,489 |
| | | | Cranes | 367 | 1 | 8 | 0.29 | 851 | 46,116 |
| | | | Welders | 46 | 1 | 8 | 0.45 | 166 | 8,969 |
| | | | Tractors/Loaders/Backhoes | 84 | 3 | 8 | 0.37 | 746 | 40,401 |
| | Paving | 110 | Pavers | 81 | 2 | 8 | 0.42 | 544 | 3,236 |
| | | | Paving Equipment | 89 | 2 | 8 | 0.36 | 513 | 3,048 |
| | | | Rollers | 36 | 2 | 8 | 0.38 | 219 | 1,301 |
| | Architectural Coating | 110 | Air Compressors | 37 | 1 | 8 | 0.48 | 142 | 845 |
| ***PHASE 2 CONSTRUCTION FUEL DEMAND (GALLONS DIESEL FUEL)*** | | | | | | | | | ***129,724*** |
| ***TOTAL CONSTRUCTION FUEL DEMAND (GALLONS DIESEL FUEL)*** | | | | | | | | | ***442,752*** |

(Urban Crossroads, 2026b, Table 4-5)

**Table 4.6-6 Construction Trips and VMT**

| Phase | Construction Activity | Worker Trips Per Day | Vendor Trips Per Day[1] | Hauling Trips Per Day |
|---|---|---|---|---|
| Off-Site | Grading | 13 | 2 | 0 |
| | Sewer, Drain, Water | 10 | 3 | 0 |
| | Utility Crossing | 5 | 2 | 0 |
| | Dry Utilities | 5 | 2 | 0 |
| | Curb, Gutter, Street Improvement | 8 | 0 | 0 |
| 1 (In-Tract) | Sewer, Drain, Water | 10 | 4 | 0 |
| | Utility Sleeving | 5 | 5 | 0 |
| | Curb, Gutter, Street Improvement | 5 | 2 | 0 |
| | Dry Utilities | 5 | 2 | 0 |
| 1 (On-Site) | Grading | 33 | 12 | 0 |
| | Building Construction | 135 | 22 | 0 |
| | Paving | 15 | 0 | 0 |
| | Architectural Coating | 27 | 0 | 0 |
| 2 | Building Construction | 226 | 44 | 0 |
| | Paving | 15 | 0 | 0 |
| | Architectural Coating | 45 | 0 | 0 |

[1] It should be noted that based on CalEEMod User's Guide Version 2022, Projects that include on-road water or cement trucks, "can account for the on-road emissions by entering this information as additional vendor trips on the Trips and VMT screen". As such, water trucks associated with all phases were accounted for as additional vendor trips (Urban Crossroads, 2026b, Table 4-6)

Table 4.6-7, *Construction Worker Fuel Consumption Estimates,* provides an estimated annual fuel consumption resulting from Project construction worker trips. Based on Table 4.6-7, it is estimated that 194,225 gallons of fuel would be consumed related to construction worker trips during full construction of the Project. It should be noted that construction worker trips would represent a "single-event" gasoline fuel demand and would not require on-going or permanent commitment of fuel resources for this purpose. (Urban Crossroads, 2026b, p. 32)

**Table 4.6-7 Construction Worker Fuel Consumption Estimates**

| Phase | Year | Construction Activity | Duration (Days) | Worker Trips/Day | Trip Length (miles) | VMT | Average Vehicle Fuel Economy (mpg) | Estimated Fuel Consumption (gallons) |
|---|---|---|---|---|---|---|---|---|
| Off-Site | 2025 | LDA | | | | | | |
| | | Grading | 58 | 7 | 18.5 | 7,511 | 32.49 | 231 |
| | | LDT1 | | | | | | |
| | | Grading | 58 | 4 | 18.5 | 4,292 | 25.14 | 171 |
| | | LDT2 | | | | | | |
| | | Grading | 58 | 4 | 18.5 | 4,292 | 25.29 | 170 |
| | 2026 | LDA | | | | | | |
| | | Grading | 43 | 7 | 18.5 | 5,569 | 33.43 | 167 |
| | | Sewer, Drain, Water | 154 | 5 | 18.5 | 14,245 | 33.43 | 426 |
| | | Utility Crossing | 26 | 3 | 18.5 | 1,443 | 33.43 | 43 |
| | | Dry Utilities | 34 | 3 | 18.5 | 1,887 | 33.43 | 56 |

| Phase | Year | Construction Activity | Duration (Days) | Worker Trips/Day | Trip Length (miles) | VMT | Average Vehicle Fuel Economy (mpg) | Estimated Fuel Consumption (gallons) |
|---|---|---|---|---|---|---|---|---|
| | | Curb, Gutter, Street Improvement | 44 | 4 | 18.5 | 3,256 | 33.43 | 97 |
| | | LDT1 | | | | | | |
| | | Grading | 43 | 4 | 18.5 | 3,182 | 25.70 | 124 |
| | | Sewer, Drain, Water | 154 | 3 | 18.5 | 8,547 | 25.70 | 333 |
| | | Utility Crossing | 26 | 2 | 18.5 | 962 | 25.70 | 37 |
| | | Dry Utilities | 34 | 2 | 18.5 | 1,258 | 25.70 | 49 |
| | | Curb, Gutter, Street Improvement | 44 | 2 | 18.5 | 1,628 | 25.70 | 63 |
| | | LDT2 | | | | | | |
| | | Grading | 43 | 4 | 18.5 | 3,182 | 26.01 | 122 |
| | | Sewer, Drain, Water | 154 | 3 | 18.5 | 8,547 | 26.01 | 329 |
| | | Utility Crossing | 26 | 2 | 18.5 | 962 | 26.01 | 37 |
| | | Dry Utilities | 34 | 2 | 18.5 | 1,258 | 26.01 | 48 |
| | | Curb, Gutter, Street Improvement | 44 | 2 | 18.5 | 1,628 | 26.01 | 63 |
| | 2027 | LDA | | | | | | |
| | | Curb, Gutter, Street Improvement | 22 | 4 | 18.5 | 1,628 | 34.29 | 47 |
| | | LDT1 | | | | | | |
| | | Curb, Gutter, Street Improvement | 22 | 2 | 18.5 | 814 | 26.22 | 31 |
| | | LDT2 | | | | | | |
| | | Curb, Gutter, Street Improvement | 22 | 2 | 18.5 | 814 | 26.63 | 31 |
| ***OFF-SITE CONSTRUCTION WORKER FUEL CONSUMPTION*** | | | | | | | | ***2,675*** |
| 1 (In-Tract) | 2027 | LDA | | | | | | |
| | | Sewer, Drain, Water | 63 | 5 | 18.5 | 5,828 | 34.29 | 170 |
| | | Utility Sleeving | 10 | 3 | 18.5 | 555 | 34.29 | 16 |
| | | Curb, Gutter, Street Improvement | 25 | 3 | 18.5 | 1,388 | 34.29 | 40 |
| | | Dry Utilities | 30 | 3 | 18.5 | 1,665 | 34.29 | 49 |
| | | LDT1 | | | | | | |
| | | Sewer, Drain, Water | 63 | 3 | 18.5 | 3,497 | 26.22 | 133 |
| | | Utility Sleeving | 10 | 2 | 18.5 | 370 | 26.22 | 14 |
| | | Curb, Gutter, Street Improvement | 25 | 2 | 18.5 | 925 | 26.22 | 35 |
| | | Dry Utilities | 30 | 2 | 18.5 | 1,110 | 26.22 | 42 |
| | | LDT2 | | | | | | |
| | | Sewer, Drain, Water | 63 | 3 | 18.5 | 3,497 | 26.63 | 131 |
| | | Utility Sleeving | 10 | 2 | 18.5 | 370 | 26.63 | 14 |
| | | Curb, Gutter, Street Improvement | 25 | 2 | 18.5 | 925 | 26.63 | 35 |
| | | Dry Utilities | 30 | 2 | 18.5 | 1,110 | 26.63 | 42 |
| ***PHASE 1 (IN-TRACT) CONSTRUCTION WORKER FUEL CONSUMPTION*** | | | | | | | | ***645*** |
| | 2026 | LDA | | | | | | |
| | | Grading | 154 | 17 | 18.5 | 48,433 | 33.43 | 1,449 |
| | | LDT1 | | | | | | |
| | | Grading | 154 | 9 | 18.5 | 25,641 | 25.70 | 998 |
| | | LDT2 | | | | | | |
| | | Grading | 154 | 9 | 18.5 | 25,641 | 26.01 | 986 |

| Phase | Year | Construction Activity | Duration (Days) | Worker Trips/Day | Trip Length (miles) | VMT | Average Vehicle Fuel Economy (mpg) | Estimated Fuel Consumption (gallons) |
|---|---|---|---|---|---|---|---|---|
| 1 (On-Site) | 2027 | | | | LDA | | | |
| | | Grading | 23 | 17 | 18.5 | 7,234 | 34.29 | 211 |
| | | Building Construction | 238 | 68 | 18.5 | 299,404 | 34.29 | 8,733 |
| | | | | | LDT1 | | | |
| | | Grading | 23 | 9 | 18.5 | 3,830 | 26.22 | 146 |
| | | Building Construction | 238 | 34 | 18.5 | 149,702 | 26.22 | 5,710 |
| | | | | | LDT2 | | | |
| | | Grading | 23 | 9 | 18.5 | 3,830 | 26.63 | 144 |
| | | Building Construction | 238 | 34 | 18.5 | 149,702 | 26.63 | 5,622 |
| | 2028 | | | | LDA | | | |
| | | Building Construction | 260 | 68 | 18.5 | 327,080 | 35.14 | 9,307 |
| | | Paving | 75 | 8 | 18.5 | 11,100 | 35.14 | 316 |
| | | Architectural Coating | 75 | 14 | 18.5 | 19,425 | 35.14 | 553 |
| | | | | | LDT1 | | | |
| | | Building Construction | 260 | 34 | 18.5 | 163,540 | 26.76 | 6,110 |
| | | Paving | 75 | 4 | 18.5 | 5,550 | 26.76 | 207 |
| | | Architectural Coating | 75 | 7 | 18.5 | 9,713 | 26.76 | 363 |
| | | | | | LDT2 | | | |
| | | Building Construction | 260 | 34 | 18.5 | 163,540 | 27.23 | 6,006 |
| | | Paving | 75 | 4 | 18.5 | 5,550 | 27.23 | 204 |
| | | Architectural Coating | 75 | 7 | 18.5 | 9,713 | 27.23 | 357 |
| ***PHASE 1 (ON-SITE) CONSTRUCTION WORKER FUEL CONSUMPTION*** | | | | | | | | ***47,420*** |
| 2 | 2026 | | | | LDA | | | |
| | | Building Construction | 219 | 113 | 18.5 | 457,820 | 33.43 | 13,693 |
| | | | | | LDT1 | | | |
| | | Building Construction | 219 | 57 | 18.5 | 230,936 | 25.70 | 8,985 |
| | | | | | LDT2 | | | |
| | | Building Construction | 219 | 57 | 18.5 | 230,936 | 26.01 | 8,879 |
| | 2027 | | | | LDA | | | |
| | | Building Construction | 261 | 113 | 18.5 | 545,621 | 34.29 | 15,914 |
| | | | | | LDT1 | | | |
| | | Building Construction | 261 | 57 | 18.5 | 275,225 | 26.22 | 10,497 |
| | | | | | LDT2 | | | |
| | | Building Construction | 261 | 57 | 18.5 | 275,225 | 26.63 | 10,336 |
| | 2028 | | | | LDA | | | |
| | | Building Construction | 260 | 113 | 18.5 | 543,530 | 35.14 | 15,466 |
| | | | | | LDT1 | | | |
| | | Building Construction | 260 | 57 | 18.5 | 274,170 | 26.76 | 10,244 |
| | | | | | LDT2 | | | |
| | | Building Construction | 260 | 57 | 18.5 | 274,170 | 27.23 | 10,068 |
| | 2029 | | | | LDA | | | |
| | | Building Construction | 261 | 113 | 18.5 | 545,621 | 35.96 | 15,172 |
| | | Paving | 109 | 8 | 18.5 | 16,132 | 35.96 | 449 |
| | | Architectural Coating | 109 | 23 | 18.5 | 46,380 | 35.96 | 1,290 |
| | | | | | LDT1 | | | |
| | | Building Construction | 261 | 57 | 18.5 | 275,225 | 27.31 | 10,077 |
| | | Paving | 109 | 4 | 18.5 | 8,066 | 27.31 | 295 |
| | | Architectural Coating | 109 | 12 | 18.5 | 24,198 | 27.31 | 886 |
| | | | | | LDT2 | | | |
| | | Building Construction | 261 | 57 | 18.5 | 275,225 | 27.79 | 9,903 |

| Phase | Year | Construction Activity | Duration (Days) | Worker Trips/Day | Trip Length (miles) | VMT | Average Vehicle Fuel Economy (mpg) | Estimated Fuel Consumption (gallons) |
|---|---|---|---|---|---|---|---|---|
| | | Paving | 109 | 4 | 18.5 | 8,066 | 27.79 | 290 |
| | | Architectural Coating | 109 | 12 | 18.5 | 24,198 | 27.79 | 871 |
| | 2030 | LDA | | | | | | |
| | | Building Construction | 1 | 113 | 18.5 | 2,091 | 36.74 | 57 |
| | | Paving | 1 | 8 | 18.5 | 148 | 36.74 | 4 |
| | | Architectural Coating | 1 | 23 | 18.5 | 426 | 36.74 | 12 |
| | | LDT1 | | | | | | |
| | | Building Construction | 1 | 57 | 18.5 | 1,055 | 27.86 | 38 |
| | | Paving | 1 | 4 | 18.5 | 74 | 27.86 | 3 |
| | | Architectural Coating | 1 | 12 | 18.5 | 222 | 27.86 | 8 |
| | | LDT2 | | | | | | |
| | | Building Construction | 1 | 57 | 18.5 | 1,055 | 28.31 | 37 |
| | | Paving | 1 | 4 | 18.5 | 74 | 28.31 | 3 |
| | | Architectural Coating | 1 | 12 | 18.5 | 222 | 28.31 | 8 |
| ***PHASE 2 CONSTRUCTION WORKER FUEL CONSUMPTION*** | | | | | | | | ***143,485*** |
| ***TOTAL CONSTRUCTION WORKER FUEL CONSUMPTION*** | | | | | | | | ***194,225*** |

(Urban Crossroads, 2026b, Table 4-7)

### 4. *Construction Vendor Fuel Estimates*

With respect to estimated VMT, the construction vendor trips (vehicles that deliver materials to the site during construction) would generate an estimated 596,986 VMT along area roadways for the Project over the duration of construction activity. It is assumed that 50% of all vendor trips are from medium-heavy duty trucks (MHDT) and 50% of vendor trips are from heavy-heavy duty trucks (HHDT). These assumptions are consistent with the CalEEMod defaults utilized within the within the Project's AQIA (EIR *Technical Appendix B1*). Vehicle fuel efficiencies for MHDTs and HHDTs were estimated using information generated within EMFAC2021. EMFAC2021 was run for the MHDT and HHDT vehicle classes within the California sub-area for the 2025 through 2030 calendar years. Data from EMFAC2021 is shown in Appendix 4.6 of the Project's EA (*Technical Appendix E)*. (Urban Crossroads, 2026b, p. 37)

Based on Table 4.6-8, *Construction Vendor Fuel Consumption Estimates*, it is estimated that 78,926 gallons of fuel would be consumed related to construction vendor trips during full construction of the Project. It should be noted that Project construction vendor trips would represent a "single-event" diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose. (Urban Crossroads, 2026b, p. 37)

**Table 4.6-8 Construction Vendor Fuel Consumption Estimates**

| Phase | Year | Construction Activity | Duration (Days) | Vendor/ Hauling Trips/Day | Trip Length (miles) | VMT | Average Vehicle Fuel Economy (mpg) | Estimated Fuel Consumption (gallons) |
|---|---|---|---|---|---|---|---|---|
| Off-Site | 2025 | MHDT | | | | | | |
| | | Grading | 58 | 1 | 10.2 | 592 | 8.60 | 69 |
| | | HHDT (Vendor) | | | | | | |

| Phase | Year | Construction Activity | Duration (Days) | Vendor/ Hauling Trips/Day | Trip Length (miles) | VMT | Average Vehicle Fuel Economy (mpg) | Estimated Fuel Consumption (gallons) |
|---|---|---|---|---|---|---|---|---|
| | | Grading | 58 | 1 | 10.2 | 592 | 6.22 | 95 |
| | 2026 | MHDT | | | | | | |
| | | Grading | 43 | 1 | 10.2 | 439 | 8.72 | 50 |
| | | Sewer, Drain, Water | 154 | 2 | 10.2 | 3,142 | 8.72 | 360 |
| | | Utility Crossing | 26 | 1 | 10.2 | 265 | 8.72 | 30 |
| | | Dry Utilities | 34 | 1 | 10.2 | 347 | 8.72 | 40 |
| | | HHDT (Vendor) | | | | | | |
| | | Grading | 43 | 1 | 10.2 | 439 | 6.33 | 69 |
| | | Sewer, Drain, Water | 154 | 2 | 10.2 | 3,142 | 6.33 | 497 |
| | | Utility Crossing | 26 | 1 | 10.2 | 265 | 6.33 | 42 |
| | | Dry Utilities | 34 | 1 | 10.2 | 347 | 6.33 | 55 |
| ***OFF-SITE CONSTRUCTION VENDOR FUEL CONSUMPTION*** | | | | | | | | ***1,307*** |
| 1 (In-Tract) | 2027 | MHDT | | | | | | |
| | | Sewer, Drain, Water | 63 | 2 | 10.2 | 1,285 | 8.87 | 145 |
| | | Utility Sleeving | 10 | 3 | 10.2 | 306 | 8.87 | 34 |
| | | Curb, Gutter, Street Improvement | 25 | 1 | 10.2 | 255 | 8.87 | 29 |
| | | Dry Utilities | 30 | 1 | 10.2 | 306 | 8.87 | 34 |
| | | HHDT (Vendor) | | | | | | |
| | | Sewer, Drain, Water | 63 | 2 | 10.2 | 1,285 | 6.45 | 199 |
| | | Utility Sleeving | 10 | 3 | 10.2 | 306 | 6.45 | 47 |
| | | Curb, Gutter, Street Improvement | 25 | 1 | 10.2 | 255 | 6.45 | 40 |
| | | Dry Utilities | 30 | 1 | 10.2 | 306 | 6.45 | 47 |
| ***PHASE 1 (IN-TRACT) CONSTRUCTION VENDOR FUEL CONSUMPTION*** | | | | | | | | ***576*** |
| 1 (On-Site) | 2026 | MHDT | | | | | | |
| | | Grading | 154 | 6 | 10.2 | 9,425 | 8.72 | 1,080 |
| | | HHDT (Vendor) | | | | | | |
| | | Grading | 154 | 6 | 10.2 | 9,425 | 6.33 | 1,490 |
| | 2027 | MHDT | | | | | | |
| | | Grading | 23 | 6 | 10.2 | 1,408 | 8.87 | 159 |
| | | Building Construction | 238 | 11 | 10.2 | 26,704 | 8.87 | 3,009 |
| | | HHDT (Vendor) | | | | | | |
| | | Grading | 23 | 6 | 10.2 | 1,408 | 6.45 | 218 |
| | | Building Construction | 238 | 11 | 10.2 | 26,704 | 6.45 | 4,140 |
| | 2028 | MHDT | | | | | | |
| | | Building Construction | 260 | 11 | 10.2 | 29,172 | 9.09 | 3,210 |
| | | HHDT (Vendor) | | | | | | |
| | | Building Construction | 260 | 11 | 10.2 | 29,172 | 6.60 | 4,421 |
| ***PHASE 1 (ON-SITE) CONSTRUCTION VENDOR FUEL CONSUMPTION*** | | | | | | | | ***17,727*** |
| 2 | 2026 | MHDT | | | | | | |
| | | Building Construction | 219 | 22 | 10.2 | 49,144 | 8.72 | 5,633 |
| | | HHDT (Vendor) | | | | | | |
| | | Building Construction | 219 | 22 | 10.2 | 49,144 | 6.33 | 7,769 |
| | 2027 | MHDT | | | | | | |
| | | Building Construction | 261 | 22 | 10.2 | 58,568 | 8.87 | 6,600 |
| | | HHDT (Vendor) | | | | | | |
| | | Building Construction | 261 | 22 | 10.2 | 58,568 | 6.45 | 9,079 |
| | 2028 | MHDT | | | | | | |
| | | Building Construction | 260 | 22 | 10.2 | 58,344 | 9.09 | 6,421 |

| Phase | Year | Construction Activity | Duration (Days) | Vendor/ Hauling Trips/Day | Trip Length (miles) | VMT | Average Vehicle Fuel Economy (mpg) | Estimated Fuel Consumption (gallons) |
|---|---|---|---|---|---|---|---|---|
| | | HHDT (Vendor) | | | | | | |
| | | Building Construction | 260 | 22 | 10.2 | 58,344 | 6.60 | 8,842 |
| | 2029 | MHDT | | | | | | |
| | | Building Construction | 261 | 22 | 10.2 | 58,568 | 9.37 | 6,253 |
| | | HHDT (Vendor) | | | | | | |
| | | Building Construction | 261 | 22 | 10.2 | 58,568 | 6.76 | 8,664 |
| | 2030 | MHDT | | | | | | |
| | | Building Construction | 1 | 22 | 10.2 | 224 | 9.72 | 23 |
| | | HHDT (Vendor) | | | | | | |
| | | Building Construction | 1 | 22 | 10.2 | 224 | 6.93 | 32 |
| ***PHASE 2 CONSTRUCTION VENDOR FUEL CONSUMPTION*** | | | | | | | | ***59,316*** |
| ***TOTAL CONSTRUCTION VENDOR FUEL CONSUMPTION*** | | | | | | | | ***78,926*** |

(Urban Crossroads, 2026b, Table 4-8)

### 5. *Construction Energy Efficiency/Conservation Measures*

Starting in 2014, CARB adopted the nation's first regulation aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turnover the oldest and dirtiest equipment to newer, cleaner models and prevent fleets from adding older, dirtier equipment. As such, the equipment used for Project construction would conform to CARB regulations and California emissions standards. It should also be noted that there are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities, or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in the construction of the Project would therefore not result in inefficient, wasteful, or unnecessary consumption of fuel. (Urban Crossroads, 2026b, p. 40)

Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption. (Urban Crossroads, 2026b, p. 40)

Additional construction-source energy efficiencies would occur due to required California regulations and best available control measures (BACM). For example, CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Section 2449(d)(3) requires that grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling." In this manner, construction equipment operators are required to be informed that engines are to be turned off at

or prior to five minutes of idling. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints. (Urban Crossroads, 2026b, p. 40)

A full Life-Cycle Analysis (LCA) related to the energy needed to form construction materials is not included in this analysis due to a lack of detailed Project-specific information on construction materials. Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the Project development, infrastructure, and on-going operations) depends on emission factors or econometric factors that are not well established for all processes. At this time, an analysis of the energy needed to create Project-related construction materials would be extremely speculative and thus has not been prepared. (Urban Crossroads, 2026b, p. 40; Urban Crossroads, 2026d, p. 45)

In general, the construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing, and refinement. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations. (Urban Crossroads, 2026b, p. 40)

### B. Operational Energy Demands

Energy consumption in support of or related to Project operations would include transportation energy demands (energy consumed by passenger car vehicles accessing the Project site), fuel demands from operational equipment, and facilities energy demands (energy consumed by building operations and site maintenance activities). (Urban Crossroads, 2026b, p. 41)

#### 1. *Transportation Energy Demands*

Energy that would be consumed by Project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the Project site. The VMT per vehicle class can be determined by evaluated in the vehicle fleet mix and the total VMT. As with worker and vendors trips, operational vehicle fuel efficiencies were estimated using information generated within EMFAC2021 developed by CARB. For purposes of analysis and as a conservative measure, EMFAC2021 was run for the Riverside County subarea for the 2030 calendar year. Data from EMFAC2021 is shown in Appendix 4.6 of the Project's EA (*Technical Appendix E)*. As summarized on Table 4.6-9, *Total Project-Generated Traffic Annual Fuel Consumption*, the Project Buildout would result in an estimated 22,491,163 annual VMT and an annual fuel consumption of 828,836 gallons of fuel. (Urban Crossroads, 2026b, p. 41)

#### 2. *Facility Energy Demands*

Project building operations activities would result in the consumption of electricity and natural gas. Electricity and natural gas would be supplied to the Project by SCE and SoCal Gas. Electricity and natural gas demands of the Project are summarized in Table 4.6-10, *Project Annual Operational Energy Demand*

*Summary*, and provided in Appendix 4.6 of the Project's Energy Analysis (*Technical Appendix E)*. (Urban Crossroads, 2026b, pp. 41-42)

**Table 4.6-9 Total Project-Generated Traffic Annual Fuel Consumption**

| Vehicle Type | Average Vehicle Fuel Economy (mpg) | Annual VMT | Estimated Annual Fuel Consumption (gallons) |
|---|---|---|---|
| LDA | 36.74 | 11,092,146 | 301,897 |
| LDT1 | 27.86 | 777,082 | 27,897 |
| LDT2 | 28.31 | 4,915,333 | 173,618 |
| MDV | 22.91 | 3,468,147 | 151,403 |
| LHDT1 | 18.91 | 664,206 | 35,131 |
| LHDT2 | 17.52 | 190,386 | 10,865 |
| MHDT | 9.72 | 348,505 | 35,851 |
| HHDT | 6.93 | 383,011 | 55,234 |
| OBUS | 7.42 | 12,759 | 1,719 |
| UBUS | 8.73 | 8,392 | 961 |
| MCY | 42.56 | 493,296 | 11,591 |
| SBUS | 6.63 | 29,464 | 4,447 |
| MH | 5.95 | 108,437 | 18,221 |
| ***TOTAL (ALL VEHICLES)*** | | ***22,491,163*** | ***828,836*** |

(Urban Crossroads, 2026b, Table 4-9)

**Table 4.6-10 Project Annual Operational Energy Demand Summary**

| Land Use | Electricity Demand (kWh/year) | Natural Gas Demand (kBTU/year) |
|---|---|---|
| Single Family Housing | 3,586,270 | 13,656,697 |
| Multifamily (Low-Rise) Residential | 1,574,762 | 3,903,151 |
| Senior Adult Housing | 547,743 | 1,357,618 |
| ***TOTAL PROJECT ENERGY DEMAND*** | ***5,708,775*** | ***18,917,466*** |

kWh – kilo-Watt hour
kBTU – kilo-British Thermal Units
(Urban Crossroads, 2026b, Table 4-10)

### 3. *Operational Energy Efficiency/Conservation Measures*

Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent state and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards; and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, California Green Building Standards Code). (Urban Crossroads, 2026b, p. 42)

The Project incorporates a series of measures that generally would reduce energy demand associated with the Project. As previously stated, the Project would comply with Title 24 Standards which include incorporating contemporary design features such as photovoltaic systems or renewable energy for new homes. Lastly, the Project would implement energy-saving features and operational programs, consistent

with the reduction measures set forth in the County's CAP Update, to be incorporated into all residential portions developed pursuant to the Project. Notably, the Project would comply with the California Green Building Standards Code (CALGreen; CCR, Title 24, Part 11) as implemented by the County of Riverside. (Urban Crossroads, 2026b, p. 42)

Project annual fuel consumption estimates presented previously in Table 4.6-9 represent likely potential maximums that would occur for the Project. Under subsequent future conditions, average fuel economies of vehicles accessing the Project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation, and in response to fuel economy and emissions standards imposed on newer vehicles entering the circulation system. (Urban Crossroads, 2026b, p. 42)

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) likely would decrease future gasoline fuel demands per VMT. (Urban Crossroads, 2026b, p. 42)

### C. Summary of Energy Demands

#### 1. *Construction Energy Demands*

The estimated power cost of on-site electricity usage during the building construction of the Project is assumed to be approximately $120,504.61. Additionally, based on the assumed power cost, it is estimated that the total electricity usage during building construction, after full Project build-out, is calculated to be approximately 554,478 kWh. (Urban Crossroads, 2026b, p. 43)

Construction equipment used by the Project would result in a single event consumption of approximately 442,752 gallons of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies. (Urban Crossroads, 2026b, p. 43)

CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. BACMs inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints. (Urban Crossroads, 2026b, p. 43)

Construction worker trips for full construction of the Project would result in the estimated fuel consumption of 194,225 gallons of fuel. Additionally, fuel consumption from construction vendor trips (MHDTs and HHDTs) would total approximately 78,926 gallons. Diesel fuel would be supplied by County and regional residential vendors. Indirectly, construction energy efficiency and energy conservation would be achieved using bulk purchases, transport and use of construction materials. The 2023 IEPR released by the CEC has shown that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements. As supported by the preceding discussions, Project construction energy

consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, 2026b, p. 43)

### 2. *Operational Energy Demands*

#### *Transportation Energy Demands*

Annual vehicular trips and related VMT generated by the operation of the Project would result in a fuel demand of 828,836 gallons of fuel. Fuel would be provided by current and future residential vendors. Trip generation and VMT generated by the Project are consistent with other residential uses of similar scale and configuration, as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Ed., 2021) and CalEEMod. As such, Project operations would not result in excessive and wasteful vehicle trips and VMT, nor would it result in excess and wasteful vehicle energy consumption compared to other residential uses. (Urban Crossroads, 2026b, p. 43)

In addition, enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. The Project would implement sidewalks, facilitating and encouraging pedestrian access. Facilitating pedestrian and bicycle access also would reduce VMT and associated energy consumption. In compliance with the California Green Building Standards Code and County requirements, the Project would promote the use of bicycles as an alternative mean of transportation by providing short-term and/or long term bicycle parking accommodations. As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, 2026b, p. 44)

#### *Facility Energy Demands*

Project facility operational energy demands are estimated at: 5,708,775 kWh/year of electricity and 18,917,466 kBTU/year of natural gas. Electricity would be supplied by SCE, and natural gas would be supplied by SoCal Gas. The Project proposes conventional residential uses reflecting contemporary energy efficient/energy conserving designs and operational programs. The Project does not propose uses that are inherently energy intensive and the energy demands in total would be comparable to other residential uses of similar scale and configuration. (Urban Crossroads, 2026b, p. 44)

Implementation of the Project would increase the demand for electricity at the Project site and petroleum consumption in the region during operation. However, the electrical consumption demands of the Project during operation would conform to the state's Title 24 and to CALGreen standards, which implement conservation measures. Further, the proposed Project would not directly require the construction of new energy generation or supply facilities and providers of electricity are in compliance with regulatory requirements that assist in conservation, including requirements that electrical providers achieve state-mandated renewal energy production requirements. With compliance with Title 24 conservation standards and other regulatory requirements, the Project would not be wasteful, be inefficient, or unnecessarily consume energy resources during construction or operation and would result in a less-than-significant impact with respect to consumption of energy resources. Lastly, the Project would comply with the

applicable 2022 Title 24 standards in effect at the time of building permit application for each phase of development. Compliance with applicable Title 24 standards will ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, 2026b, p. 44)

### D. Project and Countywide Energy Consumption

The Project's electricity consumption shown in Table 4.6-11, *Project and Countywide Energy Consumption*, summarizes the estimated energy consumption for the Project compared to the County. As shown in Table 4.6-11, the Project's energy usage would constitute an approximate 0.03% increase over the County's typical annual electricity consumption, and an approximate 0.04% increase over the County's typical annual natural gas consumption (CEC, n.d.). Thus, Project-related energy consumption would not be wasteful, inefficient, or unnecessary.

**Table 4.6-11 Project and Countywide Energy Consumption**

| Energy Type | Project Annual Energy Consumption | Riverside County Annual Energy Consumption | Percentage Increase Countywide |
|---|---|---|---|
| Electricity | 5,708,775 kWh | 17,418,390,000 kWh | 0.03% |
| Natural Gas | 18,917,466 kBTU | 42,659,295,868 kBTU | 0.04% |

(CEC, n.d.)

### E. Conclusion

As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Accordingly, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

**Threshold b: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

A summary of the Project's consistency with applicable regulations and requirements is provided below.

***Consistency with Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)***

Transportation and access to the Project site is provided by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project site.

***Consistency with the Transportation Equity Act for the 21st Century (TEA-21)***

The Project site is located in an area with proximate access to the Interstate freeway system. The site selected for the Project facilitates access, acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The Project supports the strong planning processes emphasized under TEA-21. The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21.

***Consistency with 2024 Integrated Energy Policy Report (IEPR)***

The 2024 IEPR Update advances California's goals of maintaining a reliable, clean, and affordable energy system, including through an updated 15-year California Energy Demand Forecast and evaluation of emerging energy resources. The Project is consistent with these goals in that it would not place unusual or disproportionate demands on the regional energy supply system, would comply with the 2025 Title 24 energy efficiency standards, and would incorporate solar photovoltaic systems that reduce net electricity demand from the grid. As such, the Project would not interfere with, nor obstruct, the energy planning goals and policy recommendations presented in the 2024 IEPR. Development of the proposed Project would therefore support, rather than conflict with, the State's ongoing efforts to ensure reliable and efficient energy supplies for existing and future consumers.

***Consistency with State of California Energy Plan***

The Project site is located in an area with proximate access to the Interstate freeway system. The site selected for the Project facilitates access and takes advantage of existing infrastructure systems. The Project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.

***Consistency with California Code Title 24, Part 6, Energy Efficiency Standards***

The 2022 version of Title 24 was adopted by the CEC and will become effective on January 1, 2023, while the 2025 version of Title 24 will become effective on January1, 2026. As the Project building construction is anticipated in 2025, it is presumed that the Project would be required to comply with the Title 24 standards in place at that time. Therefore, the Project would not result in a significant impact on energy resources.

***Consistency with California Code Title 24, Part 11, CALGreen***

CCR, Title 24, Part 11: CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that were published on July 1, 2022, and became effective on January 1, 2023. The Project would be required to comply with the applicable standards in place at the time plan check submittals are made. Thus, the Project would not conflict with the provisions of CALGreen.

***Consistency with AB 1493***

AB 1493 is not applicable to the Project as it is a Statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of the requirements under AB 1493.

***Consistency with Renewable Portfolio Standard (RPS)***

California's RPS is not applicable to the Project as it is a Statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS.

***Consistency with Senate Bill 350 (SB 350) and Senate Bill 100 (SB 100)***

The proposed Project would use energy from SCE, which has committed to diversify their portfolio of energy sources by increasing energy from wind and solar sources. No feature of the Project would interfere with implementation of SB 350 and SB 100. Additionally, the Project would be designed and constructed to implement the energy efficiency measures for new residential developments and would include several measures designed to reduce energy consumption in accordance with Title 24.

***Conclusion***

As indicated above, the Project would not conflict with any of the state or local plans. As such, impacts would be less than significant.

### 4.6.5 Cumulative Impact Analysis

As indicated under the analysis of Threshold a., there are no components of the proposed Project that would result in the wasteful, inefficient, or unnecessary consumption of energy resources. Although it is possible other cumulative developments could result in the wasteful, inefficient, or unnecessary consumption of energy resources, the Project's projected energy demand during operations would be less-than-cumulatively considerable with mandatory compliance with applicable regulations.

As indicated under the analysis of Threshold b., the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As such, the Project has no potential to result in cumulatively-considerable impacts due to a conflict with or obstruction of such plans.

### 4.6.6 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State of California. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation.

Threshold b.: Less-than-Significant Impact. Energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other mixed use (residential/commercial retail) projects of similar scale and intensity that are operating in California, as the Project would be subject to current regulatory requirements, such as the 2022 and/or 2025 version of Title 24, which were not in effect when most existing developments were constructed. The CEC anticipates that the 2022 energy code will provide $1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons. Moreover, the Project would be subject to compliance with the Riverside County CAP and would be required to achieve a minimum of 100 points per the CAP screening tables, which would further reduce the Project's energy demand. Based on the analysis presented herein, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

### 4.6.7 Regulations, Design Requirements, and Mitigation

***Regulations and Design Requirements***

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

- Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles.

- Renewable Portfolio Standards (SB 100). Increases California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

- CCR Title 13, Motor Vehicles, Section 2449(d)(3), Idling. Grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling.

***Mitigation***

Project impacts due to energy consumption would be less than significant; therefore, mitigation measures are not required.

### 4.6.8 References


| Cited As | Reference |
|---|---|
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| Riverside County, 2019a | *Riverside County Climate Action Plan Update*. November 2019. Accessed: September 13, 2021. Available on-line at: https://planning.rctlma.org/Portals/14/CAP/2019/2019_CAP_Update_Full.pdf. |
| Urban Crossroads, 2026b | Urban Crossroads, 2026b. *Keller Crossing Specific Plan Energy Analysis*. February 17, 2026. Included as EIR *Technical Appendix E*. |

# 4.7 GEOLOGY AND SOILS

This subsection evaluates the existing surface and subsurface geologic conditions at the Project site and identifies potential impacts associated with these conditions. The analysis in this Subsection is based, in part, on information from the report titled, "Updated Geotechnical and Infiltration Evaluation, Proposed Single-Family Residential Development, Keller Crossing Project, Northwest Corner of Winchester Road and Keller Road, Winchester Area of Riverside County, California" (herein, "Geotechnical Update"), prepared by GeoTek, Inc. (herein, "GeoTek"), dated May 25, 2021, and included as EIR *Technical Appendix F1* (GeoTek, 2021). This report updates and incorporates findings to a July 29, 2009 geotechnical investigation prepared by GeoSoils Inc. (GSI) and included as EIR *Technical Appendix F2* (GeoSoils, 2009). A summary of the findings in the GSI report is presented in Section 3 of the Project's Geotechnical Update. In addition, an additional technical report was prepared to demonstrate that the hard rock areas previously identified on site would not require blasting or rock crushing during Project construction. This report is titled, "Supplemental Rock Hardness Evaluation," is dated August 1, 2024, and is included as *EIR Technical Appendix F3*. Refer to Section 7.0, *References*, for a complete list of source documents.

## 4.7.1 Existing Conditions

### A. Regional Geology

The Project site is situated in the Peninsular Ranges geomorphic province. This province varies in width from about 30 to 100 miles. It is bounded on the west by the Pacific Ocean, on the south by the Gulf of California and on the east by the Colorado Desert Province. The Peninsular Ranges are essentially a series of northwest-southeast oriented fault blocks. Several major fault zones are found in this province. The Elsinore Fault zone and the San Jacinto Fault zone trend northwest-southeast and are mostly found near the middle of the province. (GeoTek, 2021, p. 8)

Specifically, the Project site is located in an area geologically mapped to be underlain mostly by meta-sedimentary (phyllite) bedrock (phyllite and schist, with abundant feldspar and quartz) with areas in the southeast, south, and west of the site underlain by alluvium. Based on field investigations conducted by GeoTek, the alluvial areas have been geologically mapped as older alluvium. Additionally, the site was geologically mapped by GSI (2009) as being underlain by very old alluvial deposits and Phyllite bedrock. GSI indicated that adverse geologic structure within the Phyllite bedrock is not anticipated to comprise a constraint to development. (GeoTek, 2021, p. 8)

### B. Local Geology and Subsurface Soil Conditions

A brief description of the earth materials reported to be on the site by GSI (2009) and encountered in field explorations for the Project site and areas of proposed offsite utilities is presented below. Detailed logs of the subsurface conditions of the site are presented in Appendices A and B of the Project's Geotechnical Update (*Technical Appendix F1*). Report of the seismic refraction survey by GeoTek is presented in Appendix C of the Project's Geotechnical Update.

- Artificial Fill. Artificial fill materials were observed in Boring B-7 located west of the Project site within areas of proposed utility improvements. These materials consist of silty sand and sandy silt which

has various shades of brown and olive in color, slightly moist, and is in loose condition, based on field observations conducted by GeoTek. The fill thickness encountered in Boring B-7 was 2 feet. The fill materials apparently were originated from the construction of Keller Road. (GeoTek, 2021, p. 9)

- Older Alluvium. Older Alluvium was encountered in all the exploratory trenches excavated within the Project site and within the majority of the exploratory borings drilled along the proposed utility alignments. These materials consist of silty sand, sandy silt, and clayey sand and extended from the ground surface to depths of about 2 to 8.5 feet, with average depths of 4 to 6 feet. The older alluvium was brown, red and gray in color, slightly moist to moist, and medium dense to very dense, based on field observations conducted by GeoTek. (GeoTek, 2021, p. 9)

- Metasedimentary Bedrock. Metasedimentary bedrock was observed at the Project site and under the proposed off-site utility alignments at typical depths of 4 to 6 feet and in some areas as deep as approximately 8.5 feet. The regional geologic map shows the bedrock being composed of schist (phyllite), generally with foliations in a northwest/southeast orientation with inclinations ranging from 52 degrees to 75 degrees to the northeast. GSI describes the bedrock as fissile black phyllite with a predominantly east-west strike with steep northerly inclinations. GSI states the rocks are generally moderately weathered in the near surface and become hard to very hard at depth. (GeoTek, 2021, p. 9)

  The on-site bedrock consists of phyllite which is moderately to highly weathered within its upper portions and is generally recovered as gray, brown, and red fine to medium sand and clayey sand when excavated. The bedrock becomes less weathered with depth. All of the exploratory trenches explored on field observations conducted by GeoTek were able to be excavated to a maximum depth of 20 feet, with increasing difficulty below 15 feet below ground surface. (GeoTek, 2021, p. 9)

  The seismic refraction survey generally identified three zones of subsurface materials. The uppermost zone comprises mostly soil and highly weathered bedrock and is estimated to extend up to 5 feet below grade. The middle zone was noted to correspond to weathered bedrock to depths ranging generally from about 18 to 60 feet with velocities ranging from 3,700 to 4,600 feet per second (fps). The bottom zone was noted to comprise less weathered bedrock with velocities ranging from 7,100 to 10,800 fps. A tomographic model conducted for seismic line 3 indicated that relatively fresh bedrock exists near the center portion of the line at about 30 feet below existing grade. (GeoTek, 2021, pp. 9-10)

  To estimate the approximate depth to rippable bedrock and rippable trenching (utility construction) using the seismic refraction data collected at the site, cut-off velocities of 5,000 fps and 4,000 fps, have been utilized respectively during field observations conducted by GeoTek examining the excavation of the recent site trenches. Based on the above, it is estimated that the north-central, elevated portions of the Project site contain marginally rippable bedrock. Hard, marginally rippable bedrock is anticipated to exist in that area at general depths ranging from 20 to 40 feet. The seismic refraction traverses performed by GSI (2009) also indicated hard bedrock in the northeastern end of

the Project site with depth to marginally rippable rock ranging from 25 to 30 feet. (GeoTek, 2021, p. 10)

The seismic refraction lines by GeoTek and GSI also suggest that very difficult to non-rippable trenching could be encountered in areas of Lines 1 and 3 through 5 by GeoTek and Lines 4 and 9 by GSI at about 5 to 10 feet below existing grades, based on a cut-off velocity of 4,000 pounds per square foot (psf). Most of these lines are also situated within the north-central and northeastern ends of the Project site. The rest of the lines appear to indicate that rippable trenching could achieve a depth of 20 to 40 feet below grade. However, the majority of the Project site's exploratory trenches noted slow excavation below 15 feet. (GeoTek, 2021, p. 10)

- Granitic Bedrock. Granitic bedrock was encountered in exploratory boring B-7 located on Keller Road within an area of proposed utilities. These materials generally excavated as fine to coarse sand and were found at a depth of about 3 feet. The granitic bedrock was found to be gabbroic in composition that was orange and brown in color, slightly moist to moist, hard, and highly weathered, based on field observations conducted by GeoTek. (GeoTek, 2021, p. 10)

### C. Site Topography

As previously shown in EIR Figure 2-9, the Project site's topography is characterized by relatively flat topography in the southern portions of the site, with undulating hill forms occurring in the north and northeastern portions of the Project site. Elevations on site range from 1,422 feet above mean sea level (amsl) in the southeast corner of the Project site to 1,587 feet amsl near the northeast corner of the Project site. (Google Earth, 2025)

### D. Groundwater

Groundwater was not encountered on the Project site during exploratory borings or trenches excavated to a maximum depth of 32.1 feet. Additionally, groundwater was not encountered by GSI to an explored depth of 9 feet below existing ground surface. Regional groundwater level is estimated to be greater than 50 feet below the existing ground surface. (GeoTek, 2021, p. 11)

The California Department of Water Resources, Water Data Library, was searched for groundwater data, however, none of the wells in the general vicinity of the Project had groundwater depths more recent than 1968. Accordingly, these wells are not representative of current groundwater condition on the Project site. The nearest well was found on GeoTracker approximately 3 miles southeast of the Project site. Groundwater was encountered in this well (NM-MW4S) at 45 feet below ground surface. However, seasonal perched groundwater may be encountered during grading within the lower elevations of the site. (GeoTek, 2021, p. 11)

## E. Faulting and Seismicity

### *1. Faulting*

The geologic structure of the entire southern California area is dominated mainly by northwest-trending faults associated with the San Andreas system. The Project site is in a seismically active region; however, no active or potentially active fault is known to exist at the Project site nor is the site situated within a State of California designated *"Alquist-Priolo"* Earthquake Fault Zone. The County of Riverside has designated the site as "not in a fault zone" and "not in a fault line." The nearest known active fault zone is the Elsinore Fault – Temecula Section located approximately 7.9 miles southwest of the site. Therefore, the potential for surface rupture at the site is considered negligible. (GeoTek, 2021, pp. 11-12)

### *2. Secondary Seismic Effects*

Secondary effects of seismic activity normally considered as possible hazards to a site include several types of ground failure. Evidence of ancient landslides or slope instabilities at the Project site was not observed during field investigation. Thus, the potential for landslides is considered negligible. (GeoTek, 2021, p. 13)

The potential for secondary seismic hazard such as a tsunami is considered negligible due to the Project site elevation and great distance to the ocean. Diamond Valley Lake is located approximately 2.8 miles northeast of the Project site. This man-made lake was designed for a maximum water elevation 1,756 feet amsl, which is approximately 334 feet above the lowest elevation of the subject site. However, the design and construction of the lake's three dams was recently completed (2002) and included dam safety for a strong seismic event. Accordingly, the risk of a seiche associated with Diamond Valley Lake is minor. (GeoTek, 2021, p. 13)

Additionally, Skinner Reservoir is located approximately 2.4 miles southeast of the site. This man-made reservoir was designed for a maximum water elevation of 1,497 feet about amsl which is about 75 feet above the lowest elevation of the Project site. However, site area surficial drainage west of the skinner reservoir dam generally is to the west-southwest with topographic high areas between the dam and the Project site. Therefore, risk of seiche or flooding from dam failure is considered to be minor. (GeoTek, 2021, p. 13)

Other bodies of water such as Heritage Lake and Canyon Lake are situated at greater distances and/or lower elevations than the site. Thus, the hazard of seiche related to these lakes is anticipated to be low. Rock fall hazards are considered nil based on the lack of perched loose rock materials and dense nature of the underlying bedrock. (GeoTek, 2021, p. 13)

### *3. Liquefaction and Seismically-Induced Settlement*

Liquefaction is not considered to be a hazard at the Project site due the presence of shallow bedrock materials. Also, the potential for seismically-induced settlement at the property is considered to be nil because of the minimal thickness of soil atop bedrock. Additionally, GSI concluded the absence of a liquefaction hazard at the site and no further investigation or analysis of this nature are warranted. The County of Riverside has designated the site having "low" liquefaction potential and as being "susceptible" to subsidence. (GeoTek, 2021, pp. 12-13)

### F. Volumetric Changes – Shrinkage and Subsidence

Volumetric changes in earth quantities occur when excavated onsite soil and bedrock materials are replaced as properly compacted fill. Provided below is an estimate of shrinkage and bulking factors for the various geologic units present onsite: (GeoTek, 2021, p. 5)

- Colluvium/topsoil: Shrinkage of 5 to 10%
- Older Alluvium: Shrinkage of 0 to 10%
- Phyllite bedrock: Bulking 15 to 25%

Subsidence of 0.10 feet was estimated in non-bedrock areas. (GeoTek, 2021, p. 5)

### G. Expansive Soils

Based on the results of the laboratory testing conducted by GeoTek, the on-site materials have mostly "very low" (0≤ EI ≤20) expansion potential with occasional materials having "low" to "medium" expansion potential, per ASTM D 4829 (GeoTek, 2021).

### H. Soil Types and Erosion Potential

EIR Table 2-1 (previously presented) provides a summary of the soils present on the Project site, and identifies the attendant rate of runoff and erosion susceptibility. As shown, approximately 15.8% of the Project site has a "Slow" rate of runoff and a "Slight" susceptibility to erosion. Approximately 1.9% of the Project site has a "Slow to Medium" rate of erosion and a "Moderate" susceptibility to erosion. Approximately 15.7% of the Project site has a "Medium" rate of runoff and a "Moderate" susceptibility to erosion. Approximately 49.5% of the Project site has a "Rapid" rate of runoff and a "High" susceptibility to erosion. Approximately 17.1% of the Project site has a "Very Rapid" rate of runoff and a "Very High" susceptibility to erosion. (USDA, 1971, pp. 30, 34, 42-44, and 62-65; USDA, 2021)

## 4.7.2 Applicable Regulatory Requirements

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

### A. Federal Regulations

*1. Clean Water Act*

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all

contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man- made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters.

**B. State Regulations**

*1. Alquist-Priolo Earthquake Fault Zoning Act (A-P Act)*

The Alquist-Priolo Earthquake Fault Zoning Act (A-P Act) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The A-P Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The A-P Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards.

The A-P Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. ["Earthquake Fault Zones" were called "Special Studies Zones" prior to January 1, 1994.] The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Local agencies must regulate most development projects within the zones. Projects include all land divisions and most structures for human occupancy. Single family wood-frame and steel-frame dwellings up to two stories not part of a development of four units or more are exempt. However, local agencies can be more restrictive than state law requires.

Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet).

*2. Seismic Hazards Mapping Act*

The Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code, Chapter 7.8, Section 2690-2699.6) directs the Department of Conservation, California Geological Survey to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the SHMA is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards.

Staff geologists in the Seismic Hazards Program gather existing geological, geophysical, and geotechnical data from numerous sources to produce the Seismic Hazard Zone Maps. They integrate and interpret these data regionally in order to evaluate the severity of the seismic hazards and designate as Zones of Required Investigation (ZORI) those areas prone to liquefaction and earthquake–induced landslides. Cities and

counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes.

The law requires the State Geologist to establish regulatory zones (Zones of Required Investigation) and to issue appropriate maps (Seismic Hazard Zone maps). These maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling construction and development. Single-family wood-frame or steel-frame dwellings up to two stories not part of a development of four or more units are exempt from the state requirements. However, local agencies can be more restrictive than state law requires.

Before a development permit can be issued or a subdivision approved, cities and counties must require a site-specific investigation to determine whether a significant hazard exists at the site and, if so, recommend measures to reduce the risk to an acceptable level. The investigation must be performed by state-licensed engineering geologists and/or civil engineers.

The SHMA requires site-specific geotechnical investigations be conducted within the ZORI to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy.

*3. Natural Hazards Disclosure Act*

The Natural Hazards Disclosure Act, effective June 1, 1998 (as amended June 9, 1998), requires that sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more state-mapped hazard areas, including a Seismic Hazard Zone.

The law requires the State Geologist to establish regulatory zones (Zones of Required Investigation) and to issue appropriate maps (Seismic Hazard Zone maps). These maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling construction and development. Single-family frame dwellings up to two stories not part of a development of four or more units are exempt from the state requirements. However, local agencies can be more restrictive than state law requires.

Before a development permit can be issued or a subdivision approved, cities and counties must require a site-specific investigation to determine whether a significant hazard exists at the site and, if so, recommend measures to reduce the risk to an acceptable level. The investigation must be performed by state-licensed engineering geologists and/or civil engineers.

*4. Essential Services Building Seismic Safety Act*

In 1986, the California Legislature determined that buildings providing essential services should be capable of providing those services to the public after a disaster. Their intent in this regard was defined in legislation known as the Essential Services Buildings Seismic Safety Act of 1986 and includes requirements that such buildings shall be "...designed and constructed to minimize fire hazards and to resist...the forces generated

by earthquakes, gravity, and winds." This enabling legislation can be found in the California Health and Safety Code, Chapter 2, Sections 16000 through 16022. In addition, the California Building Code defines how the intent of the act is to be implemented in Title 24, Part 1 of the California Building Standards Administrative Code, Chapter 4, Articles 1 through 3.

*5. California Building Standards Code (Title 24)*

California Code of Regulations (CCR) Title 24 is reserved for state regulations that govern the design and construction of buildings, associated facilities, and equipment. These regulations are also known as building standards (California Health and Safety Code § 18909). Health and Safety Code (state law) Section 18902 gives CCR Title 24 the name California Building Standards Code (CBSC).

The CBSC in CCR Title 24 is published by the California Building Standards Commission and it applies to all building occupancies (see Health and Safety Code §§ 18908 and 18938) throughout the State of California. Cities and counties are required by state law to enforce CCR Title 24 (Health and Safety Code §§ 17958, 17960, 18938(b), and 18948). Cities and counties may adopt ordinances making more restrictive requirements than provided by CCR Title 24, because of local climatic, geological, or topographical conditions. Such adoptions and a finding of need statement must be filed with the California Building Standards Commission (Health and Safety Code §§ 17958.7 and 18941.5).

*6. Porter-Cologne Water Control Act*

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 *et seq*.), the policy of the State is as follows:

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The Storm Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions.

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. The Project site is located in the Santa Ana River Watershed, which is within the purview of Santa Ana Regional Water Quality Control Board (RWQCB). The RWQCB's Santa Ana Region Basin Plan ("Basin Plan"), as most recently updated in June 2019, is the governing water quality plan for the region.

*7. Public Resources Code Section 5097.5*

The California Public Resources Code (PRC) Section 5097.5 states:

- No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site[s], including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.
- As used in this section, "public lands" means lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof.

## C. Local Regulations

*1. Riverside County Ordinance No. 457 – Riverside County Building and Fire Codes*

Every three years, Riverside County's Building and Fire Codes are adapted from the California Building Standards Code (CCR Title 24), which includes both building and fire codes. These codes establish site-specific investigation requirements, construction standards and inspection procedures to ensure that development authorized by the County of Riverside does not pose a threat to the health, safety, or welfare of the public. The California Building Standards Code contains minimum baseline standards to guard

against unsafe development. This ordinance also adopts, in some cases with modification to a stricter standard, a number of California State's Title 24 codes (fire, building, plumbing, electrical, etc.). The Riverside County Department of Building and Safety provides technical expertise in reviewing and enforcing these codes. (Riverside County, 2015, p. 4.12-25)

*2. Riverside County Ordinance No. 547 - Implementation of the Alquist-Priolo Earthquake Fault Zoning Act*

This ordinance establishes the policies and procedures used by the County of Riverside to implement the A-P Act. Among other things, it requires all projects proposed within an "earthquake fault zone," as shown on the maps prepared by the State Geologist to comply with the provisions of the A-P Act. It establishes regulations for construction, including for grading, slopes and compaction, erosion control, retaining wall design and earthquake fault zone setbacks. (Riverside County, 2015, p. 4.12-25)

*3. Riverside County Ordinance No. 484 – Control of Blowing Dust*

This ordinance establishes requirements for the control of blowing sand within county-designated "Agricultural Dust Control Areas." It defines activities that may contribute to wind erosion, identifies restrictions on activities within these areas, establishes penalties for violation of the ordinance and identifies procedures necessary to obtain a valid permit. (Riverside County, 2015, p. 4.12-25)

*4. Riverside County Ordinance No. 460 – Regulating the Division of Land*

Ordinance No. 460 regulates subdivisions pursuant to the Subdivision Map Act. All land divisions throughout unincorporated Riverside County are subject to all of the applicable provisions of the Subdivision Map Act and this ordinance.

### 4.7.3 Basis for Determining Significance

Section VII of Appendix G to the CEQA Guidelines addresses typical adverse effects due to geological conditions, and includes the following threshold questions to evaluate the Project's impacts resulting from geological or soil conditions:

a. *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*

   i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

   ii. *Strong seismic ground shaking*

   iii. *Seismic-related ground failure, including liquefaction*

   iv. *Landslides*

b. *Result in substantial soil erosion or the loss of topsoil;*

c. *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;*

d. *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;*

e. *Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water;*

f. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

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

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

b. *Be subject to seismic-related ground failure, including liquefaction;*

c. *Be subject to strong seismic ground shaking;*

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

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

f. *Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard;*

g. *Change topography or ground surface relief features;*

h. *Create cut or fill slopes greater than 2:1 or higher than 10 feet;*

i. *Result in grading that affects or negates subsurface sewage disposal systems;*

j. *Result in substantial soil erosion or the loss of topsoil;*

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

l. *Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water;*

m. *Be impacted by or result in an increase in wind erosion and blow sand, either on or off site.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified by the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on geology and soils. It should be noted that the Project's potential impacts to paleontological resources are addressed separately in Subsection 4.14, *Paleontological Resources*, of this EIR.

### 4.7.4 Impact Analysis

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

**Threshold c.: Would the Project be subject to strong seismic ground shaking?**

The Project is located in a seismically-active region; however, no active or potentially active fault is known to exist at the Project site nor is the site situated within an Alquist-Priolo Earthquake Fault Zone. No faults are identified on geologic maps readily available and reviewed as part of the Project's Geotechnical Update (*Technical Appendix F1* to this EIR). The nearest known active fault zone is the Elsinore Fault – Temecula Section located approximately 7.9 miles southwest of the site. Therefore, impacts due to rupture of a known earthquake would be less-than-significant. (GeoTek, 2021, p. 12)

As previously stated, the Project site is located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. The risk is not considered substantially different than that of other similar properties in the southern California area. The Project would be required to construct all proposed structures in accordance with the California Building Standards Code (CBSC, Title 24) and the Riverside County Building Code. The CBSC and Riverside County Building Code have been designed to preclude significant adverse effects associated with strong seismic ground shaking. Additionally, the Project's Geotechnical Update (*Technical Appendix F1*) includes site-specific recommendations to attenuate seismic-related hazards.

However, a significant impact could occur if the Project did not comply with the site-specific recommendations of the Project's Geotechnical Update (*Technical Appendix F1*). The Project's Geotechnical Update includes recommendations that would reduce seismic risks to an "acceptable level" as defined by the California Code of Regulations. Accordingly, prior to mitigation implementing the Geotechnical Update recommendations, the proposed Project has the potential to expose people or structures to substantial adverse effects, including loss, injury, or death, as a result of strong seismic ground shaking. This is evaluated as a significant impact for which mitigation would be required.

**Threshold b.: Would the Project be subject to seismic-related ground failure, including liquefaction?**

Seismically-induced liquefaction is a phenomenon in which cyclic stresses, produced by earthquake-induced ground motion, create excess pore pressures in soils. The soils may thereby acquire a high degree of mobility, and lead to lateral movement, sliding, sand boils, consolidation and settlement of loose sediments, and other damaging deformations. This phenomenon occurs only below the water table; but

after liquefaction has developed, it can propagate upward into overlying, non-saturated soil as excess pore water dissipates. Typically, liquefaction has a relatively low potential at depths greater than 45 feet and is virtually unknown below a depth of 60 feet.

The condition of liquefaction has two principal effects. One is the consolidation of loose sediments with resultant settlement of the ground surface. The other effect is lateral sliding. Significant permanent lateral movement generally occurs only when there is significant differential loading, such as fill on natural ground slopes. Liquefaction susceptibility is related to numerous factors and the following conditions should be present for liquefaction to occur: 1) sediments must be relatively young in age and not have developed a large amount of cementation; 2) sediments generally consist of medium to fine grained, relatively cohesionless sands; 3) the sediments must have low relative density; 4) free groundwater must be present in the sediment; and 5) the site must experience a seismic event of a sufficient duration and magnitude, to induce straining of soil particles.

Based on site observations and subsurface investigations conducted by GeoTek, the Project site is not susceptible to soil liquefaction based on the depth to groundwater being in excess of 50 feet below grade and due to the presence of shallow dense soil/bedrock materials across most of the Project site. Also, the potential for seismically-induced settlement at the property is considered to be nil because of the minimal thickness of soil atop bedrock. Accordingly, the Project would not be subject to seismic-related ground failure, including liquefaction, and impacts would therefore be less than significant. (GeoTek, 2021, p. 13)

**Threshold d.: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?**

***Landslide Hazard***

Evidence of ancient landslides or slope instabilities at the Project site were not observed during field investigation. Thus, the potential for landslides is considered negligible. Accordingly, impacts due to landslide hazards would be less than significant. (GeoTek, 2021, p. 13)

***Lateral Spreading***

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures.

Due to the low probability of liquefaction to occur on site due the presence of shallow bedrock materials and minimal thickness of soil atop bedrock, the potential for lateral spreading is also considered low (GeoTek, 2021, pp. 12-13). Nonetheless, impacts could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the Project's Geotechnical Update

(*Technical Appendix F1*). This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

***Collapse Hazards***

Static settlement of the site would be induced by subjecting the existing grades to design grades (adding fill) and by the proposed structural building loads. Impacts due to collapse hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the Project's Geotechnical Update that would be required in association with Project grading and building permits. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

***Rockfall Hazards***

A rockfall is a fragment of rock, or block of rocks, that detaches from a vertical to sub-vertical cliff or bluff in a downward motion. Under existing conditions, rock fall hazards are considered nil based on the lack of perched loose rock materials and dense nature of the underlying bedrock (GeoTek, 2021, p. 13). As such, the Project site would not be subject to rockfall hazards. Accordingly, impacts due to rockfall hazards would be less than significant.

**Threshold e.: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?**

The County of Riverside indicates that the Project site is "susceptible" to subsidence. However, according to the Project's Geotechnical Update (*Technical Appendix F1* to this EIR), the potential for seismically induced settlement at the property is considered to be nil because of the minimal thickness of soil atop bedrock. (GeoTek, 2021, pp. 12-13) As such, the Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in ground subsidence, and impacts would therefore be less than significant.

**Threshold f.: Would the Project be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?**

There are no volcanoes in the Project region; thus, no impacts due to volcanic hazards would occur.

A seiche is an underwater wave that oscillates through a body of water which may be triggered by earthquakes or landslides. In general, seiches are small (on the order of a few inches) and are present in larger lakes as a result of the depth, temperature, and contours of the body of water. Diamond Valley Lake is located approximately 2.8 miles northeast of the site and was recently constructed (2002) to include dam safety for a strong seismic event. Additionally, Skinner Reservoir located approximately 2.4 miles southeast of the Project site has a minor risk of seiche or flooding from dam failure. (GeoTek, 2021, p. 13) Due to the lack of an onsite body of water or other bodies of water within close proximity to the site that have the potential to result in site inundation, the potential for the subject site to be impacted by seiches is considered low. As such, impacts due to seiches would be less than significant.

Although several existing hill forms occur in the northern portion of the Project site and would be preserved as open space, due to the relatively shallow depth to bedrock that occurs across the Project site, the risk of mudflow associated with these hill forms would be low. As such, impacts due to mudflow hazards would be less than significant.

**Threshold g.: Would the Project change topography or ground surface relief features?**

As discussed in EIR Section 3.0, the Project site would be graded in a manner that generally follows the site's existing topographic conditions. The proposed grading plan is designed to maintain natural drainage patterns and to achieve a near-balanced earthwork condition, with approximately 1.2 million cubic yards (c.y.) of raw cut and fill. It is anticipated that grading would be balanced on-site, with no need to import or export soil materials. As such, the Project would not result in substantial changes to the site's topography or ground surface relief features, and impacts would be less than significant.

**Threshold h.: Would the Project create cut or fill slopes greater than 2:1 or higher than 10 feet?**

As shown on the Project's proposed Tentative Tract Map No. 38163 ("TTM 38163"; refer to Figure 3-11 of this EIR), manufactured slopes along the boundary of the proposed OS-CH land use designation in Planning Area 9 of SP 380A1 would be constructed at a 2:1 gradient, with a maximum height of approximately 35 feet. Although these slopes would exceed 10 feet in height, the Project's *Geotechnical Update* (*Technical Appendix F1*) includes site-specific design recommendations to ensure gross slope stability. However, a significant impact could occur if the Project did not comply with the site-specific recommendations of the Project's Geotechnical Update. Accordingly, this is evaluated as a potentially significant direct impact of the Project for which mitigation would be required.

**Threshold i.: Would the Project result in grading that affects or negates subsurface sewage disposal systems?**

According to the Project's Phase I Environmental Site Assessment (EIR *Technical Appendix H1*), and based upon the historic and present property use, there are no known septic tanks (systems) or other subsurface sewage disposal systems that exist on the Project site (Tetra Tech, 2020). As such, no impact associated with subsurface sewage disposal would occur.

**Threshold l.: Would the Project have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

Sewer service to the proposed Project would be provided by the EMWD, and no septic tanks or alternative waste water disposal systems are proposed as part of the Project. SP 380A1 includes a Conceptual Sewer Plan (refer to EIR Figure 3-9) that would be implemented by proposed TTM 38163. The proposed sewer improvements would involve the construction of 8-inch and 12-inch gravity sewer lines that would connect to an existing 18-inch gravity sewer main and manhole located southeast of Winchester Road in Abelia

Street, south of the Project site. As such, no impact associated with septic tanks or alternative waste water disposal systems would occur.

| | |
|---|---|
| **Threshold j.:** | **Would the Project result in substantial soil erosion or the loss of topsoil?** |
| **Threshold m.:** | **Would the Project be impacted by or result in an increase in wind erosion and blow sand, either on or off site?** |

Implementation of the Project has the potential to result in soil erosion. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and long-term operation.

❑ **Construction-Related Impacts**

Proposed grading and construction activities at the Project site would expose underlying soils and disturb surficial soils. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water.

Pursuant to the requirements of the State Water Resources Control Board, the Project Applicant is required to obtain an NPDES permit for construction activities, including proposed grading. The NPDES permit is required for all projects that include construction activities such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. The County's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Project-specific Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would identify a combination of erosion control and sediment control measure (i.e., Best Management Practices [BMPs]) to reduce or eliminate sediment discharge to surface water from storm water and non-stormwater source discharges during construction.

In addition, proposed construction activities would be required to comply with SCAQMD Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion. Rule 403 requires that certain construction practices be following that limit dust and dirt from leaving the construction site. For example, no dust is allowed to be tracked out of the site by more than 25 feet. In addition, proposed construction activities would be required to comply with applicable County ordinances (e.g., Ordinance Nos. 457 and 460) to protect and enhance the water quality of the County, which requires the Project Applicant to prepare an erosion control plan to be used during the rainy season. With mandatory compliance to the requirements noted in the Project's SWPPP, as well as mandatory compliance to applicable regulatory requirements including but not limited to SCAQMD Rule 403 and Riverside County Ordinance Nos. 457 and 460, the potential for water and/or wind erosion impacts during Project construction would be reduced to less-than-significant levels.

❑ **Long-Term Operational Impacts**

Following construction, wind and water erosion on the Project site would be minimized, as the disturbed areas would be landscaped or covered with impervious surfaces, and drainage would be controlled through

a storm drain system. As discussed in detail in EIR Subsection 4.10, *Hydrology and Water Quality*, the Project would detain runoff that is generated on site or that is tributary to the site in such a manner that there would not be an increase in peak flows from the Project site as compared to existing conditions. Accordingly, implementation of the Project would not increase the risk of siltation or erosion in stormwater discharged from the Project site. In addition, and pursuant to Riverside County Ordinance No. 475 (Building Codes & Fees Ordinance), Water Quality Management Plans (WQMPs) would be required for future implementing developments within the Project site, which would identify post-construction measures to ensure on-going protection against erosion. Compliance with the WQMP would be required as a condition of approval for future implementing developments, and long-term maintenance of on-site water quality features also would be required. Based on the foregoing, implementation of the Project would not significantly increase the risk of long-term wind or water erosion on- or off-site, and impacts would be less-than-significant.

**Threshold k.: Would the Project be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial risks to life or property?**

The Project's on-site soils have an expansion rating ranging from very low to medium. (GeoTek, 2021, pp. 4-5) However, results of expansion testing at finish grades would be needed to confirm final foundation design. Accordingly, impacts due to expansive soils could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the Geotechnical Update prepared for the Project and/or the recommendations of future geotechnical studies that would be required in association with grading and building permits. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

### 4.7.5 Cumulative Impact Analysis

With exception of erosion hazards, potential geologic and soils effects are inherently restricted to the areas proposed for development and would not contribute to cumulative impacts associated with other existing, planned, or proposed development. That is, thresholds including fault rupture, seismic ground shaking, liquefaction, landslides, expansive soils, and other geologic hazards would involve effects to (and not from) the proposed Project, and are specific to on-site conditions. Accordingly, addressing these potential hazards for the proposed development would involve using measures to conform to existing requirements, and/or site-specific design and construction efforts that have no relationship to, or impact on, off-site areas. Because of the site-specific nature of these potential hazards and the measures to address them, there would be no connection to similar potential issues or cumulative effects to or from other properties. Cumulatively-considerable impacts would be less-than-significant.

As discussed under Thresholds j. and m., during both near-term construction and long-term operation, measures would be incorporated into the Project's design to ensure that significant erosion hazards do not occur. Other developments within the cumulative study area would be required to comply with similar requirements, such as the need to obtain an NPDES permit and mandatory compliance with the resulting SWPPPs. All projects in the cumulative study area also would be required to demonstrate that measures have been incorporated to ensure that development does not result in substantial increases in the amount or rate of runoff under long-term operating conditions, which could in turn increase soil erosion. Further, all

projects in the cumulative study area also would be required to comply with Riverside County Ordinance Nos. 457 and 460, as well as SCAQMD Rule 403, which would preclude water- and wind-related erosion hazards during construction. Therefore, because the Project would result in less-than-significant erosion impacts, and because other projects within the cumulative study area would be subject to similar requirements to control erosion hazards during construction and long-term operation, cumulatively-considerable impacts associated with wind and water erosion hazards are evaluated as less-than-significant.

### 4.7.6 Significance of Impacts Before Mitigation

Thresholds a. & c.: Significant Direct Impact. The potential for surface fault rupture to occur at the site is considered low. Impacts due to rupture of a known earthquake would therefore be less than significant. However, the Project site is located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. A significant impact could occur if the Project did not comply with the site-specific recommendations of the Project's Geotechnical Update (*Technical Appendix F1*). Therefore, impacts would be potentially significant and mitigation is required to ensure compliance with the site-specific recommendations of the Project's Geotechnical Update.

Threshold b.: Less-than-Significant Impact. The Project site is situated in an area of generalized low/very low liquefaction potential. Based on site observations and subsurface investigations conducted by GeoTek, the Project site is not susceptible to soil liquefaction based on the depth to groundwater being in excess of 50 feet below grade and due to the presence of shallow dense soil/bedrock materials across most of the Project site. Also, the potential for seismically induced settlement at the property is considered to be nil because of the minimal thickness of soil atop bedrock. Accordingly, the Project would not be subject to seismic-related ground failure, including liquefaction, and impacts would therefore be less than significant.

Threshold d.: Significant Direct Impact. The Project site is not susceptible to landslide or rockfall hazards, and impacts would be less than significant. Impacts due to lateral spreading and collapse hazards could occur if proposed grading and development is not conducted in accordance with the site-specific recommendations of the Project's Geotechnical Update (*Technical Appendix F1*). This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

Threshold e.: Less-than-Significant Impact. The County of Riverside indicates that the Project site is "susceptible" to subsidence. However, the potential for seismically-induced settlement at the property is considered to be nil because of the minimal thickness of soil atop bedrock. As such, the Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in ground subsidence, and impacts would therefore be less than significant.

Threshold f.: Less-than-Significant Impact. The Project site is not subject to volcanic hazards or hazards associated with seiches. Although several existing hill forms occur in the northern portion of the Project site and would be preserved as open space, due to the relatively shallow depth to bedrock that occurs across

the Project site, the risk of mudflow associated with these hill forms would be low. As such, impacts due to mudflow hazards would be less than significant.

Threshold g.: Less-than-Significant-Impact. The Project site would be graded in a manner that largely approximates the site's existing topographic conditions. The Project would require a total of approximately 1.2 million cubic yards (cy) of cut and fill quantities. Earthwork activities are expected to balance on site and no import or export of soils would be required. Thus, the Project would not result in a substantial change in topography or ground surface relief features, and impacts would be less than significant.

Threshold h.: Significant Direct Impact. All proposed slopes on site would be constructed at a gradient of 2:1. Although the slopes adjacent to proposed SP 380A1 Planning Area 9 would exceed a height of 10 feet, site-specific recommendations are provided in the Project's *Geotechnical Update* (*Technical Appendix F1*) to ensure gross slope stability. Nonetheless, a significant impact could occur if the Project does not comply with the site-specific recommendations of the *Geotechnical Update*. Accordingly, prior to mitigation implementing the geotechnical study recommendations, the Project has the potential to cause significant impacts as a result of creating slopes greater than 10 feet in height. This is evaluated as a potentially significant impact for which mitigation would be required.

Threshold i.: No Impact. According to the Project's Phase I Environmental Site Assessment (*EIR Technical Appendix H1*), and based upon the historic and present property use, there are no known septic tanks (systems) or other subsurface sewage disposal systems that exist on the Project site. As such, no impact associated with subsurface sewage disposal would occur.

Threshold l.: No Impact. Sewer service to the proposed Project would be provided by the EMWD, and no septic tanks or alternative wastewater disposal systems are proposed as part of the Project. Accordingly, no impact would occur.

Thresholds j. and m.: Less-than-Significant Impacts. The Project would not result in substantial soil erosion or loss of topsoil. The Project Applicant would be required to obtain a NPDES permit for construction activities and adhere to a Stormwater Pollution Prevention Plan (SWPPP) as well as SCAQMD Rule 403 and Riverside County Ordinance Nos. 457 and 460. With mandatory compliance to these regulatory requirements, the potential for water and wind erosion impacts during construction would be less than significant. Following development, wind and water erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, the Project is required by law to implement a WQMP during operation, which would preclude substantial erosion impacts in the long-term. Accordingly, impacts would be less-than-significant.

Threshold k.: Significant Direct Impact. Impacts due to expansive soils could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the of the Project's Geotechnical Investigation (*Technical Appendix F1*). This is evaluated as a potentially significant impact for which mitigation would be required.

### 4.7.7 Regulations, Design Requirements, and Mitigation

***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 County Ordinance Nos. 457 and 460. Ordinance No. 457 requires that all projects comply with California Building Codes and the International Building Codes. These codes establish site-specific investigation requirements, construction standards, and inspection procedures to ensure that development does not pose a threat to the health, safety, and welfare of the public, and includes requirements related to erosion. Ordinance No. 460 sets forth soil erosion control requirements and requires preparation and implementation of a wind erosion control plan.

- The Project is required to comply with the provisions of SCAQMD Rule 403, by addressing blowing dust from the Project's construction activities.

- The Project is required to comply with the provisions of the County's National Pollution Discharge Elimination System (NPDES) permit, and the future-required Storm Water Pollution Prevention Plan (SWPPP). Compliance with the NPDES permit and the future-required SWPPPs would ensure an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) are implemented to reduce or eliminate sediment discharge to surface water from stormwater and non-stormwater discharges.

***Mitigation***

MM 4.7-1 Prior to issuance of grading or building permits, the Riverside County Building and Safety Department shall verify that all of the recommendations given in the Project's May 25, 2021 "Updated Geotechnical and Infiltration Evaluation, Proposed Single-Family Residential Development, Keller Crossing Project, Northwest Corner of Winchester Road and Keller Road, Winchester Area of Riverside County, California," prepared by GeoTek, Inc. and included as *Technical Appendix F1* to the Project's EIR, are incorporated into the construction and grading plans. Alternatively, the Project shall comply with the findings and recommendations of any geotechnical studies that may be required in association with future grading and/or building permits.

### 4.7.8 Significance of Impacts After Mitigation

Thresholds a. & c.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address seismic-related hazards in conformance with the CBSC and the

Riverside County Building Code. With implementation of the required mitigation, impacts due to strong seismic ground shaking would be reduced to less-than-significant levels.

Threshold d.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address the potential for lateral spreading and collapse hazards. With implementation of the required mitigation, impacts due to lateral spreading and collapse would be reduced to less-than-significant levels.

Threshold h.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to confirm that any slopes higher than 10 feet are grossly stable. In addition, the 2024 *Supplemental Rock Hardness Evaluation* (Appendix F3) supports the feasibility of slope construction by confirming that blasting is unlikely to be required and that conventional excavation methods are sufficient. With implementation of the required mitigation, impacts associated with unstable slopes would be reduced to less-than-significant levels.

Threshold k.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address expansive soils on site. With implementation of the required mitigation, impacts associated with expansive soils would be reduced to less-than-significant levels.

### 4.7.9 References


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# 4.8 GREENHOUSE GAS EMISSIONS

The analysis in this Subsection primarily is based in part on a Greenhouse Gas Analysis (herein, "GHGA") prepared by Urban Crossroads, Inc., which is titled, "Keller Crossing Specific Plan Greenhouse Gas Analysis," is dated April 3, 2025, and is included as *Technical Appendix G* to this EIR (Urban Crossroads, 2025c). Refer to Section 7.0, *References*, for a complete list of reference sources.

## 4.8.1 Existing Conditions

### A. Introduction to Global Climate Change

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of Greenhouse Gases (GHGs) in the earth's atmosphere, including carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years. (Urban Crossroads, 2025c, p. 10)

An individual project, like the Project evaluated herein, cannot generate enough GHG emissions to affect a discernible change in global climate. However, the Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. (Urban Crossroads, 2025c, p. 10)

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation, and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, $CO_2$, $N_2O$, $CH_4$, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride ($SF_6$). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radiative heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages. (Urban Crossroads, 2025c, p. 10)

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature. (Urban Crossroads, 2025c, p. 10)

## B. Greenhouse Gases

### *1. Greenhouse Gases and Health Effects*

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties and are discussed below. For the purposes of this analysis, emissions of $CO_2$, $CH_4$, and $N_2O$ were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases. (Urban Crossroads, 2025c, pp. 10-11)

#### ❑ Water

Water is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration primarily are considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. A climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change. (Urban Crossroads, 2025c, Table 2-1)

As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the Earth's surface and heat it up). (Urban Crossroads, 2025c, Table 2-1)

The main source of water vapor is evaporation from the oceans (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves. (Urban Crossroads, 2025c, Table 2-1)

There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor. (Urban Crossroads, 2025c, Table 2-1)

#### ❑ Carbon Dioxide ($CO_2$)

Carbon Dioxide ($CO_2$) is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and

distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. Prior to the industrial revolution, $CO_2$ concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 parts per million (ppm), an increase of more than 30%. Left unchecked, the concentration of $CO_2$ in the atmosphere is projected to increase to a minimum of 540 ppm by the year 2100 as a direct result of anthropogenic sources. (Urban Crossroads, 2025c, Table 2-1)

$CO_2$ is emitted from natural and man-made sources. Natural sources include the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include the burning of coal, oil, natural gas, and wood. $CO_2$ is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks. (Urban Crossroads, 2025c, Table 2-1)

Outdoor levels of $CO_2$ are not high enough to result in negative health effects. According to the National Institute for Occupational Safety and Health (NIOSH), high concentrations of $CO_2$ can result in health effects such as headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. While current concentrations of $CO_2$ in the Earth's atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour work week and short-term reference exposure levels of 30,000 ppm averaged over a 15-minute period. (Urban Crossroads, 2025c, Table 2-1)

❑ **Methane ($CH_4$)**

Methane ($CH_4$) is an extremely effective absorber of radiation, although its atmospheric concentration is less than $CO_2$ and its lifetime in the atmosphere is brief (10-12 years) compared to other GHGs. $CH_4$ in the atmosphere is generated by many different sources, such as fossil fuel production, transport and use, from the decay of organic matter in wetlands, and as a byproduct of digestion by ruminant animals such as cows. Determining which specific sources are responsible for variations in annual increases of $CH_4$ is complex, but scientists estimate that fossil fuel production and use contributes roughly 30% of the total $CH_4$ emissions. These industrial sources of $CH_4$ are relatively simple to pinpoint and control using current technology. (Urban Crossroads, 2025c, Table 2-1)

$CH_4$ is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to elevated levels of $CH_4$ can cause asphyxiation, loss of consciousness, headache and dizziness, nausea and vomiting, weakness, loss of coordination, and an increased breathing rate. (Urban Crossroads, 2025c, Table 2-1)

❑ **Nitrous Oxide ($N_20$)**

Nitrous oxide ($N_2O$), also known as laughing gas, is a colorless GHG. Concentrations of $N_2O$ also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb). $N_2O$ is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired

power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant (i.e., in whipped cream bottles), in potato chip bags to keep chips fresh, and in rocket engines and race cars. $N_2O$ can be transported into the stratosphere, be deposited on Earth's surface, or be converted to other compounds by chemical reaction. (Urban Crossroads, 2025c, Table 2-1)

$N_2O$ can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage). (Urban Crossroads, 2025c, Table 2-1)

❑ **Chlorofluorocarbons (CFCs)**

CFCs are gases formed synthetically by replacing all hydrogen atoms in $CH_4$ or ethane ($C_2H_6$) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs have no natural source. They are found in aerosol sprays, blowing agents for foams and packing materials, as solvents, and as refrigerants. (Urban Crossroads, 2025c, Table 2-1)

In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation. (Urban Crossroads, 2025c, Table 2-1)

❑ **Hydrofluorocarbons (HFCs)**

Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential (GWP). The HFCs with the largest measured atmospheric abundances are (in order), Fluoroform (HFC-23), 1,1,1,2-tetrafluoroethane (HFC134a), and 1,1-difluoroethane (HFC-152a). Prior to 1990, the only significant emissions were of HFC-23. HCF-134a emissions are increasing due to its use as a refrigerant. HFCs are manmade for applications such as automobile air conditioners and refrigerants. No health effects are known to result from exposure to HFCs. (Urban Crossroads, 2025c, Table 2-1)

❑ **Perfluorocarbons (PFCs)**

PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above earth's surface, are able to destroy the compounds. Because of this, PFCs have exceptionally long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane ($CF_4$) and hexafluoroethane ($C_2F_6$). The EPA estimates that concentrations of $CF_4$ in the atmosphere are over 70 parts per trillion (ppt). The two main sources of PFCs are primary aluminum production and semiconductor manufacture. No health effects are known to result from exposure to PFCs. (Urban Crossroads, 2025c, Table 2-1)

❑ **Sulfur Hexafluoride ($SF_6$)**

$SF_6$ is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900). The EPA indicates that concentrations in the 1990s were about 4 ppt. $SF_6$ is used for

insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing. (Urban Crossroads, 2025c, Table 2-1)

❑ **Nitrogen Trifluoride ($NF_3$)**

$NF_3$ is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that $NF_3$ has a 100-year GWP of 17,200. $NF_3$ is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers. Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis. (Urban Crossroads, 2025c, Table 2-1)

### *2. Potential Global Warming Effects*

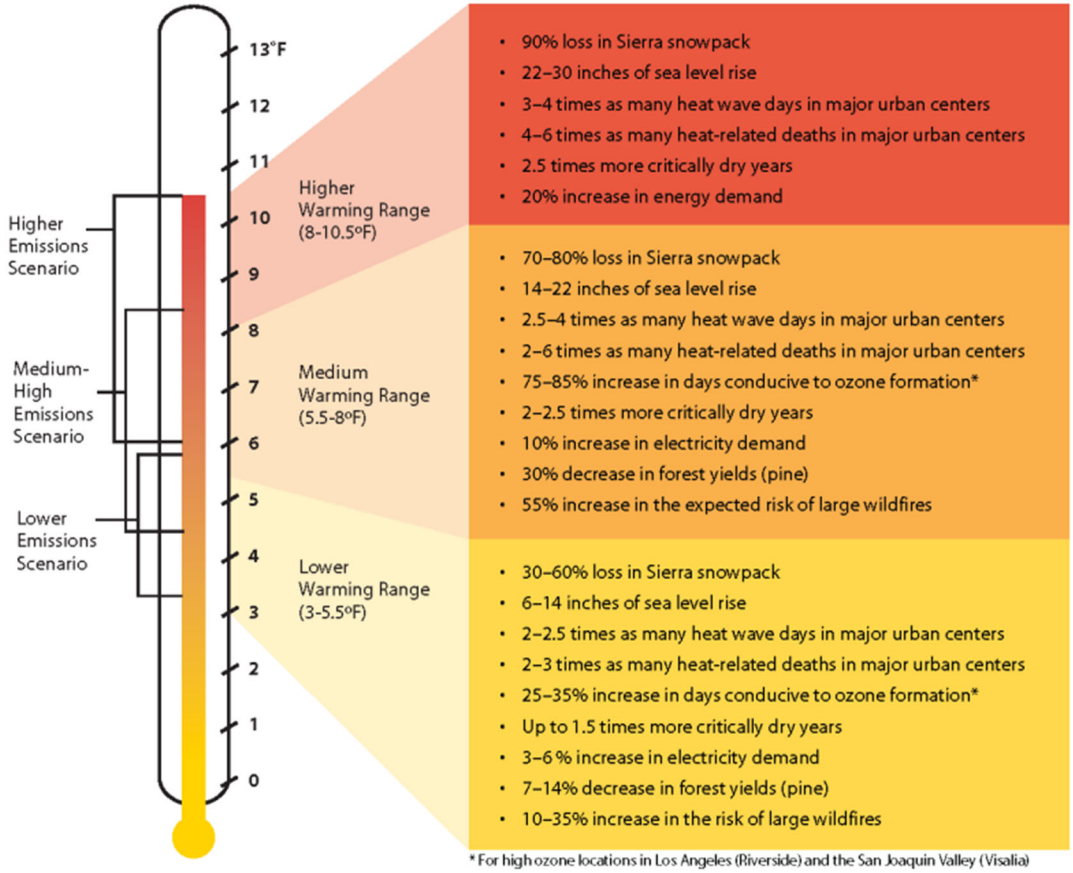
The potential health effects related directly to the emissions of $CO_2$, $CH_4$, and $N_2O$ as they relate to development projects, such as the Project, are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change likely will cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas. Figure 4.8-1, *Summary of Project Global Warming Impact 2070-2099 (As Compared with 1961-1990),* presents the potential impacts of global warming. (Urban Crossroads, 2025c, p. 16)

### *3. Global Warming Potential (GWP)*

GHGs have varying GWP values. GWP of a GHG indicates the amount of warming a gas cause over a given period of time and represents the potential of a gas to trap heat in the atmosphere. $CO_2$ is utilized as the reference gas for GWP, and thus has a GWP of 1. $CO_2$ equivalent ($CO_2e$) is a term used for describing the different GHGs in a common unit. $CO_2e$ signifies the amount of $CO_2$ which would have the equivalent GWP. (Urban Crossroads, 2025c, p. 17)

The Intergovernmental Panel on Climate Change (IPCC) is the international body for assessing the science related to climate change. IPCC Assessment Reports cover the full scientific, technical and socio-economic assessment of climate change. The atmospheric lifetime and GWP of selected GHGs are summarized in Table 4.8-1, *GWP and Atmospheric Lifetime of Select GHGs*. As shown in the table below, GWP for the 2nd Assessment Report range from 1 for $CO_2$ to 23,900 for $SF_6$ and GWP for the 6th Assessment Report range from 1 for $CO_2$ to 25,200 for $SF_6$. (Urban Crossroads, 2025c, p. 17)

**Figure 4.8-1 Summary of Project Global Warming Impact 2070-2099 (As Compared with 1961-1990)**




(Urban Crossroads, 2025c, Exhibit 2-A)

**Table 4.8-1 GWP and Atmospheric Lifetime of Select GHGs**

| Gas | Atmospheric Lifetime (years) | GWP (100-year time horizon) | |
|---|---|---|---|
| | | 2nd Assessment Report | 6th Assessment Report |
| $CO_2$ | Multiple | 1 | 1 |
| $CH_4$ | 11.8 | 21 | 28 |
| $N_2O$ | 109 | 310 | 273 |
| HFC-23 | 228 | 11,700 | 14,600 |
| HFC-134a | 14 | 1,300 | 1,526 |
| HFC-152a | 1.6 | 140 | 164 |
| $SF_6$ | 3,200 | 23,900 | 25,200 |

Source: IPCC Second Assessment Report, 1995 and IPCC Sixth Assessment Report, 2023
(Urban Crossroads, 2025c, Table 2-2)

## C. Greenhouse Gas Inventories

### *1. Global*

Worldwide anthropogenic GHG emissions are tracked by the Intergovernmental Panel on Climate Change (IPCC) for industrialized nations (Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2021. Based on the latest available data, the sum of these emissions totaled approximately 28,272,940 gigagram (Gg) $CO_2e$[1] as summarized in Table 4.8-2, *Top GHG Producing Countries and the European Union*.

**Table 4.8-2 Top GHG Producing Countries and the European Union**

| Emitting Countries | GHG Emissions (Gg $CO_2e$) |
|---|---|
| China | 12,300,200 |
| United States | 6,340,228 |
| European Union (27-member countries) | 3,468,394 |
| India | 2,839,425 |
| Russian Federation | 2,156,599 |
| Japan | 1,168,094 |
| **Total** | **28,272,940** |

(Urban Crossroads, 2025c, Table 2-3)

### *2. United States*

As noted in Table 4.8-2, the United States, as a single country, was the number two producer of GHG emissions in 2021. (Urban Crossroads, 2025c, p. 18)

### *3. State of California*

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the United States (U.S.) emissions inventory total. The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2024 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2022 GHG emissions period, California emitted an average 371.1 million metric tons of $CO_2e$ per year ($MMTCO_2e/yr$) or 371,100 Gg $CO_2e$ (5.85% of the total United States GHG emissions). Based on data published by the U.S. Energy Information Administration, California's per capita (9.12 metric tons) GHG emissions are much less than the nationwide per capita (15.8 metric ton) average. (Urban Crossroads, 2025c, p. 18)

[1] The global emissions are the sum of Annex I and non-Annex I countries, without counting Land-Use, Land-Use Change and Forestry (LULUCF). For countries without 2021 data, the United Nations' Framework Convention on Climate Change (UNFCCC) data for the most recent year were used U.N. Framework Convention on Climate Change, "Annex I Parties – GHG total without LULUCF," The most recent GHG emissions for China and India are from 2014 and 2016, respectively.

## D. Effects of Climate Change in California

### *1. Public Health*

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35% under the lower warming range to 75 to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. Based on *Our Changing Climate Assessing the Risks to California* by the California Climate Change Center, large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced. (Urban Crossroads, 2025c, p. 18)

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a significant increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat. (Urban Crossroads, 2025c, pp. 18-19)

### *2. Water Resources*

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the state from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages. (Urban Crossroads, 2025c, p. 19)

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90%. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding. (Urban Crossroads, 2025c, p. 19)

The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major fresh water supply. (Urban Crossroads, 2025c, p. 19)

### *3. Agriculture*

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25% of the water supply needed. Although higher $CO_2$ levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth. (Urban Crossroads, 2025c, p. 19)

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits, and nuts. In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates. (Urban Crossroads, 2025c, pp. 19-20)

### *4. Forest and Landscapes*

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55%, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks would not be uniform throughout the state. In contrast, wildfires in northern California could increase by up to 90% due to decreased precipitation. (Urban Crossroads, 2025c, p. 20)

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80% by the end of the century as a result of increasing temperatures. The productivity of the state's forests has the potential to decrease as a result of GCC. (Urban Crossroads, 2025c, p. 20)

### *5. Rising Sea Levels*

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with saltwater,

accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12-14 inches. (Urban Crossroads, 2025c, p. 20)

### 4.8.2 Applicable Regulatory Requirements

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

#### A. International Regulations

##### *1. Kyoto Protocol*

The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change, which commits its Parties by setting internationally binding emission reduction targets. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities."

The Kyoto Protocol was adopted in Kyoto, Japan, on December 11, 1997 and entered into force on February 16, 2005. The detailed rules for the implementation of the Protocol were adopted at Conference of the Parties (COP) 7 in Marrakesh, Morocco, in 2001, and are referred to as the "Marrakesh Accords." Its first commitment period started in 2008 and ended in 2012.

On December 8, 2012, in Doha, Qatar, the "Doha Amendment to the Kyoto Protocol" was adopted. The amendment includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from January 1, 2013 to December 31, 2020;
- A revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

On December 21, 2012, the amendment was circulated by the Secretary-General of the United Nations, acting in his capacity as Depositary, to all Parties to the Kyoto Protocol in accordance with Articles 20 and 21 of the Protocol.

During the first commitment period, 37 industrialized countries and the European Community committed to reduce GHG emissions to an average of five percent against 1990 levels. During the second commitment period, Parties committed to reduce GHG emissions by at least 18 percent below 1990 levels in the eight-year period from 2013 to 2020; however, the composition of Parties in the second commitment period is different from the first.

### *2. The Paris Agreement*

The Paris Agreement builds upon the Convention and – for the first time – brings all nations into a common cause to undertake ambitious efforts to combat climate change and adapt to its effects, with enhanced support to assist developing countries to do so. As such, it charts a new course in the global climate effort.

The Paris Agreement's central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. Additionally, the agreement aims to strengthen the ability of countries to deal with the impacts of climate change. To reach these ambitious goals, appropriate financial flows, a new technology framework and an enhanced capacity building framework will be put in place, thus supporting action by developing countries and the most vulnerable countries, in line with their own national objectives. The Agreement also provides for enhanced transparency of action and support through a more robust transparency framework.

The Paris Agreement requires all Parties to put forward their best efforts through "nationally determined contributions" (NDCs) and to strengthen these efforts in the years ahead. This includes requirements that all Parties report regularly on their emissions and on their implementation efforts.

In 2018, Parties will take stock of the collective efforts in relation to progress towards the goal set in the Paris Agreement and to inform the preparation of NDCs. There will also be a global stock-taking every five years to assess the collective progress towards achieving the purpose of the Agreement and to inform further individual actions by Parties.

The Paris Agreement entered into force on November 4, 2016, thirty days after the date on which at least 55 Parties to the Convention accounting in total for at least an estimated 55% of the total global greenhouse gas emissions have deposited their instruments of ratification, acceptance, approval, or accession with the Depositary.

On June 1, 2017, President Donald Trump announced he would begin the process of withdrawing the United States from the Paris Agreement. In accordance with articles within the Paris Agreement, the earliest effective date for the United States' withdrawal from the Agreement was November 4, 2020, at which time the withdraw became official. On January 20, 2021, President Biden signed the executive order for the United States to rejoin the Paris Agreement, which became official on February 19, 2021.

### *3. Intergovernmental Panel on Climate Change*

In 1988, the United Nations (U.N.) and the World Meteorological Organization established the IPCC to assess the scientific, technical, and socioeconomic information relevant to understanding the scientific basis of risk of human-induced climate change, its potential impacts, and options for adaptation and mitigation.

#### *4. United Nation's Framework Convention on Climate Change (UNFCCC)*

On March 21, 1994, the U.S. joined several countries around the world in signing the Convention. Under the UNFCCC, governments gather and share information on GHG emissions, national policies, and best practices; launch national strategies for addressing GHG emissions and adapting to expected impacts, including the provision of financial and technological support to developing countries; and cooperate in preparing for adaptation to the impacts of climate change.

### B. Federal Regulations

#### *1. Federal Regulation and the Clean Air Act*

Prior to the last decade, there have been no concrete federal regulations of GHGs or major planning for climate change adaptation. The following are actions regarding the federal government, GHGs, and fuel efficiency.

In *Massachusetts v. Environmental Protection Agency 549 U.S. 497* (2007), decided on April 2, 2007, the United States Supreme Court (Supreme Court) found that four GHGs, including CO2, are air pollutants subject to regulation under Section 202(a)(1) of the CAA. The Supreme Court held that the EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs— $CO_2$, $CH_4$, $N_2O$, HFCs, PFCs, and $SF_6$ —in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles.

#### *2. Mandatory Reporting of GHGs*

The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory GHG reporting requirements. On September 22, 2009, the EPA issued the Final Mandatory Reporting of GHGs Rule, which became effective January 1, 2010. The rule requires reporting of GHG emissions from large sources and suppliers in the U.S. and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons per year (MT/yr) or more GHG emissions are required to submit annual reports to the EPA.

### *3. Executive Order 13990*

On January 20, 2021, Federal agencies were directed to immediately review, and take action to address, Federal regulations promulgated and other actions taken during the last 4 years that conflict with national objectives to improve public health and the environment; ensure access to clean air and water; limit exposure to dangerous chemicals and pesticides; hold polluters accountable, including those who disproportionately harm communities of color and low-income communities; reduce GHG emissions; bolster resilience to the impacts of climate change; restore and expand our national treasures and monuments; and prioritize both environmental justice and employment.

## C. State Regulations

### *1. Title 24 Building Energy Standards*

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The latest revisions (2019 Building Energy Efficiency Standards) became effective on January 1, 2020. The 2019 Building Energy Efficiency Standards are 7 percent more efficient than the previous (2016) Building Energy Efficiency Standards for residential construction and 30 percent more efficient than the previous Standards for non-residential construction. (The 2016 Building Energy Efficiency Standards already were 28 percent more efficient for residential construction and 5 percent more efficient for nonresidential construction than the 2013 Building Energy Efficiency Standards they replaced.)

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

The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

The 2025 Building Energy Efficiency Standards apply to newly constructed buildings, additions, and alterations. Workshops are held to present revisions and obtain public comments. Proposed standards were adopted in 2024 and went into effect January 1, 2026. The California Energy Commission updates these standards every three years.

### *2. California Assembly Bill No. 1493 (AB 1493)*

AB 1493 required the California Air Resources Board (CARB) to adopt the nation's first GHG emission standards for automobiles. On September 24, 2009, CARB adopted amendments to the "Pavley" regulations that reduce greenhouse gas (GHG) emissions in new passenger vehicles from model year 2009 through 2016. These amendments were part of California's commitment toward a nation-wide program to reduce new passenger vehicle GHGs from 2012 through 2016. CARB's September amendments cement California's enforcement of the Pavley rule starting in 2009 while providing vehicle manufacturers with new compliance flexibility. The amendments also prepare California to harmonize its rules with the federal rules for passenger vehicles.

The second phase of the implementation for the Pavley bill was incorporated into Amendments to the Low-Emission Vehicle Program (LEV III) or the Advanced Clean Cars (ACC) program. The ACC program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for MY 2017 through 2025. The regulation will reduce GHGs from new cars by 34% from 2016 levels by 2025. The new rules will clean up gasoline and diesel powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid EV and hydrogen fuel cell cars. The package will also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California. On March 9, EPA reinstated California's authority under the Clean Air Act to implement its own GHG emission standards for cars and light trucks, which other states can also adopt and enforce. With this authority restored, EPA will continue partnering with states to advance the next generation of clean vehicle technologies.

### *3. Executive Order S-3-05*

Executive Order (EO) S-3-05 documents GHG emission reduction goals, creates the Climate Action Team and directs the Secretary of the California EPA to coordinate efforts with meeting the GHG reduction targets with the heads of other state agencies. The EO requires the Secretary to report back to the Governor and Legislature biannually to report: progress toward meeting the GHG goals; GHG impacts to California; and applicable Mitigation and Adaptation Plans. EO S-3-05 goals for GHG emissions reductions include: reducing GHG emissions to 2000 levels by the year 2010; reducing GHG emissions to 1990 levels by the year 2020; and reducing GHG emissions to 80 percent below 1990 levels by 2050.

### *4. California Assembly Bill 32 – Global Warming Solutions Act of 2006*

The California State Legislature enacted AB 32, which required that GHGs emitted in California be reduced to 1990 levels by the year 2020 (this goal has been met). GHGs as defined under AB 32 include CO2, CH4, N2O, HFCs, PFCs, and SF6. Since AB 32 was enacted, a seventh chemical, NF3, has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant

to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 states the following:

> *Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.*

### *5. California Senate Bill No. 1368 (SB 1368)*

In 2006, the State Legislature adopted Senate Bill (SB) 1368 (Perata, Chapter 598, Statutes of 2006), which directs the California Public Utilities Commission (CPUC) to adopt a GHG emission performance standard (EPS) for the future power purchases of California utilities. SB 1368 seeks to limit carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed specified emissions criteria. Accordingly, SB 1368 effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. SB 1368 will lead to dramatically lower GHG emissions associated with California energy demand.

### *6. Executive Order S-01-07*

Governor Schwarzenegger signed Executive Order S-01-07 on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020. CARB adopted the Low Carbon Fuel Standard (LCFS) on April 23, 2009.

After a series of legal changes, in order to address the Court ruling, CARB was required to bring a new LCFS regulation to the Board for consideration in February 2015. The proposed LCFS regulation was required to contain revisions to the 2010 LCFS as well as new provisions designed to foster investments in the production of the low-carbon intensity fuels, offer additional flexibility to regulated parties, update critical technical information, simplify and streamline program operations, and enhance enforcement. On November 16, 2015, the Office of Administrative Law (OAL) approved the Final Rulemaking Package. The new LCFS regulation became effective on January 1, 2016.

In 2018, CARB approved amendments to the regulation, which included strengthening the carbon intensity benchmarks through 2030 in compliance with the SB 32 GHG emissions reduction target for 2030. The amendments included crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector.

### *7. Senate Bill 1078*

Senate Bill (SB) 1078 establishes the California Renewables Portfolio Standard Program, which requires electric utilities and other entities under the jurisdiction of the California Public Utilities Commission to meet 20% of their renewable power by December 31, 2017 for the purposes of increasing the diversity, reliability, public health, and environmental benefits of the energy mix.

### *8. Senate Bill 107*

SB 107 directed California Public Utilities Commission's Renewable Energy Resources Program to increase the amount of renewable electricity (Renewable Portfolio Standard) generated per year, from 17% to an amount that equals at least 20% of the total electricity sold to retail customers in California per year by December 31, 2010.

### *9. Executive Order S-14-08*

On November 17, 2008, Governor Schwarzenegger signed Executive Order S-14-08, revising California's existing Renewable Portfolio Standard (RPS) upward to require all retail sellers of electricity to serve 33% of their load from renewable energy sources by 2020. In order to meet this new goal, a substantial increase in the development of wind, solar, geothermal, and other "RPS eligible" energy projects will be needed. Executive Order S-14-08 seeks to accelerate such development by streamlining the siting, permitting, and procurement processes for renewable energy generation facilities. To this end, S-14-08 issues two directives: (1) the existing Renewable Energy Transmission Initiative will identify renewable energy zones that can be developed as such with little environmental impact, and (2) the California Energy Commission (CEC) and the California Department of Fish and Wildlife (CDFW) will collaborate to expedite the review, permitting, and licensing process for proposed RPS-eligible renewable energy projects.

### *10. Senate Bill 97*

By enacting SB 97 in 2007, California's lawmakers expressly recognized the need to analyze GHGs as a part of the CEQA process. SB 97 required the Governor's Office of Planning and Research (OPR) to develop, and the Natural Resources Agency to adopt amendments to the CEQA Guidelines addressing the analysis and mitigation of greenhouse gas emissions. The amendments clarified several points, including the following:

- Lead agencies must analyze the GHG emissions of proposed projects and must reach a conclusion regarding the significance of those emissions. (See CEQA Guidelines Section 15064.4.)
- When a project's GHG emissions may be significant, lead agencies must consider a range of potential mitigation measures to reduce those emissions. (See CEQA Guidelines Section 15126.4(c).)
- Lead agencies must analyze potentially significant impacts associated with placing projects in hazardous locations, including locations potentially affected by climate change. (See CEQA Guidelines Section 15126.2(a).)
- Lead agencies may significantly streamline the analysis of GHGs on a project level by using a programmatic GHG emissions reduction plan meeting certain criteria. (See CEQA Guidelines Section 15183.5(b).)

- CEQA mandates analysis of a proposed project's potential energy use (including transportation-related energy), sources of energy supply, and ways to reduce energy demand, including through the use of efficient transportation alternatives. (See CEQA Guidelines, Appendix F.)

As part of the administrative rulemaking process, the Natural Resources Agency developed a Final Statement of Reasons explaining the legal and factual bases, intent, and purpose of the CEQA Guidelines amendments. The amendments to the CEQA Guidelines implementing SB 97 became effective on March 18, 2010.

Of note, the new guidelines state that a lead agency shall have discretion to determine whether to use a quantitative model or methodology, or in the alternative, rely on a qualitative analysis or performance-based standards. Pursuant to CEQA Guidelines Section 15064.4(a), "A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use; or (2) Rely on a qualitative analysis or performance-based standards."

CEQA emphasizes that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis. (See CEQA Guidelines Section 15130(f)).

CEQA Guidelines Section 15064.4(b) provides direction for lead agencies to assess the significance of impacts of greenhouse gas emissions:

1. *The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;*

2. *Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; or*

3. *The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must include specific requirements that reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.*

The CEQA Guidelines do not identify a threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, they call for a "good-faith effort, based on available information, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." The amendments encourage lead agencies to consider many factors in performing a CEQA analysis and preserve lead agencies' discretion to make their own determinations based upon

substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses.

### *11. Senate Bill 375*

The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, SB 375, Chapter 728, Statutes of 2008) supports the State's climate action goals to reduce greenhouse gas (GHG) emissions through coordinated transportation and land use planning with the goal of more sustainable communities.

Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the State's metropolitan planning organizations (MPO). CARB will periodically review and update the targets, as needed.

Each of California's MPOs must prepare a "sustainable communities strategy" (SCS) as an integral part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate "alternative planning strategy" (APS) to meet the targets. The APS is not a part of the RTP.

The Sustainable Communities Act also establishes incentives to encourage local governments and developers to implement the SCS or the APS. Developers can get relief from certain environmental review requirements under CEQA if their new residential and mixed-use projects are consistent with a region's SCS (or APS) that meets the targets (see Cal. Public Resources Code Sections 21155, 21155.1, 21155.2, 21159.28.).

### *12. Executive Order B-30-15*

On April 29, 2015, Governor Brown issued an executive order to establish a California GHG reduction target of 40% below 1990 levels by 2030. The Governor's executive order aligned California's GHG reduction targets with those of leading international governments ahead of the U.N. Climate Change Conference in Paris late 2015. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40% below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80% below 1990 levels by 2050 and directs CARB to update the 2017 Scoping Plan to express the 2030 target in terms of MMTCO2e. The Order also requires the state's climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions. As with Executive Order S-3-05, this Order is not legally enforceable. The state achieved its 2020 GHG emissions reductions target of returning to 1990 levels 4 years earlier than mandated by AB 32. The state is currently implementing strategies in the 2017 Scoping Plan Update to further reduce its GHG emissions by 40% below 1990 levels by 2030.

### *13. Senate Bill 32*

On September 8, 2016, Governor Jerry Brown signed the Senate Bill (SB) 32 and its companion bill, Assembly Bill (AB) 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide greenhouse gas reduction target of 80% below 1990 levels by 2050.

### *14. Executive Order B-55-18 and SB 100*

SB 100 and Executive Order B-55-18 were signed by Governor Brown on September 10, 2018. Under the existing Renewable Portfolio Standards (RPS), 25% of retail sales of electricity are required to be from renewable sources by December 31, 2016, 33% by December 31, 2020, 40% by December 31, 2024, 45% by December 31, 2027, and 50% by December 31, 2030. SB 100 raises California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California EPA (CalEPA), the California Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

### *15. Clean Energy and Pollution Reduction Act of 2015 (SB 350)*

In October 2015, the legislature approved, and Governor Jerry Brown signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for EV charging stations. Provisions for a 50% reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024, and 25% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target would be achieved through the CPUC, the CEC, and local publicly owned utilities.
- Reorganize the ISO to develop more regional electric transmission markets and to improve accessibility in these markets, which would facilitate the growth of renewable energy markets in the western United States.

### *16. 2022 CARB Scoping Plan*

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan strategy is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation - the regulations that will impact this sector are adopted and enforced by CARB on vehicle manufacturers and outside the jurisdiction and control of local governments. As stated in the Plan's executive summary:

> *The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place for a decade and a half. That means rapidly moving to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of planet-warming pollution.* (CARB, 2022, p. 1)

> *[A]pproval of this plan catalyzes a number of efforts, including the development of new regulations as well as amendments to strengthen regulations and programs already in place, not just at CARB but across state agencies.* (CARB, 2022, p. 11)

Under the 2022 Scoping Plan, the State will lead efforts to meet the 2045 carbon neutrality goal through implementation of the following objectives (CARB, 2022, pp. 194-195):

- Achieve a per capita VMT reduction of at least 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.
- Reimagine roadway projects that increase VMT in a way that meets community needs and reduces the need to drive.
- Invest in making public transit a viable alternative to driving by increasing affordability, reliability, coverage, service frequency, and consumer experience.
- Implement equitable roadway pricing strategies based on local context and need, reallocating revenues to improve transit, bicycling, and other sustainable transportation choices.341
- Expand and complete planned networks of high-quality active transportation infrastructure.342

- Channel the deployment of autonomous vehicles, ride-hailing services, and other new mobility options toward high passenger-occupancy and low VMT-impact service models that complement transit and ensure equitable access for priority populations.
- Streamline access to public transportation through programs such as the California Integrated Travel Project.
- Ensure alignment of land use, housing, transportation, and conservation planning in adopted regional plans, such as regional transportation plans (RTP)/ sustainable communities strategies (SCS), regional housing needs assessments (RHNA), and local plans (e.g., general plans, zoning, and local transportation plans), and develop tools to support implementation of these plans.
- Accelerate infill development and housing production at all affordability levels in transportation-efficient places, with a focus on housing for lower-income residents.

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects, in fact CARB states that Appendix D (page 4): "…focuses primarily on CAPs and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting."

Additionally on Page 21 in Appendix D, CARB states: "The recommendations outlined in this section apply only to residential and mixed-use development project types. California currently faces both a housing crisis and a climate crisis, which necessitates prioritizing recommendations for residential projects to address the housing crisis in a manner that simultaneously supports the State's GHG and regional air quality goals. CARB plans to continue to explore new approaches for other land use types in the future." As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

### *17. Title 20 CCR Section 1601 et seq. – Appliance Efficiency Regulations*

The Appliance Efficiency Regulations regulate the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. 23 categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles (RV) or other mobile equipment.

### *18. Title 24 CCR Part 11- California Green Building Standards Code*

CCR Title 24 Part 6: The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption.

The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission.

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that went into effect on January 1, 2023. The CEC anticipates that the 2022 energy code will provide $1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons. In addition, the 2025 California Green Building Code Standards are anticipated to go into effect on January 1, 2026, and likely will include more stringent energy conservation requirements as compared to the 2022 version of CalGreen. The Project would be required to comply with the applicable standards in place at the time plan check submittals are made.

### *19. CARB Refrigerant Management Program*

CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in sections 95380 to 95398 of Title 17, CCR. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions.

## D. Regional

### *1. Connect SoCal 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles.

SCAG's *2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*, also referred to as *Connect SoCal*, develops long-range regional transportation plans including a sustainable communities strategy and growth forecast components, regional transportation improvement programs,

regional housing needs allocations and other plans for the region. The RTP/SCS provides objectives for meeting air pollution emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in direct response to Senate Bill 375 (SB 375) which was enacted to reduce GHG emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning.

### *2. South Coast Air Quality Management District*

South Coast AQMD is the agency responsible for air quality planning and regulation in the SCAB. The South Coast AQMD addresses the impacts to climate change of projects subject to South Coast AQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The South Coast AQMD acts as an expert commenting agency for impacts to air quality.

In 2008, South Coast AQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the South Coast AQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, which could be applied by lead agencies. The Working Group has not provided additional guidance since release of the interim guidance in 2008. The South Coast AQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
    - Residential and commercial land use: 3,000 $MTCO_2e/yr$
    - Industrial land use: 10,000 $MTCO_2e/yr$
    - Based on land use type: residential: 3,500 MTCO2e/yr; commercial: 1,400 $MTCO_2e/yr$; or mixed use: 3,000 $MTCO_2e/yr$
- Tier 4 has the following options:
    - Option 1: Reduce Business-as-Usual (BAU) emissions by a certain percentage; this percentage is currently undefined.
    - Option 2: Early implementation of applicable AB 32 Scoping Plan measures

- Option 3: 2020 target for service populations (SP), which includes residents and employees: 4.8 MTCO2e per SP per year for projects and 6.6 $MTCO_2e$ per SP per year for plans;

- Option 4, 2035 target: 3.0 $MTCO_2e$ per SP per year for projects and 4.1 $MTCO_2e$ per SP per year for plans

- Tier 5 involves mitigation offsets to achieve target significance thresholds.

The South Coast AQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level (AQMD, 2008). Achieving the Executive Order's objective would contribute to worldwide efforts to cap $CO_2$ concentrations at 450 ppm, thus stabilizing global climate.

South Coast AQMD only has authority over GHG emissions from development projects that include air quality permits. If the Project requires a stationary permit, it would be subject to the applicable South Coast AQMD regulations.

South Coast AQMD Regulation XXVII, adopted in 2009 includes the following rules:

- Rule 2700 defines terms and post global warming potentials.
- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the South Coast AQMD.
- Rule 2702, GHG Reduction Program created a program to produce GHG emission reductions within the South Coast AQMD. The South Coast AQMD would fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

### E. Local

#### *1. Riverside County Climate Action Plan (CAP)*

The County of Riverside Climate Action Plan (CAP), which was adopted in December 2015 and most recently updated in December 2019 ("CAP Update"), was designed under the premise that the County of Riverside, and the community it represents, is uniquely capable of addressing emissions associated with sources under Riverside County's jurisdiction, and that Riverside County's emission reduction efforts should coordinate with the state strategies of reducing emissions in order to accomplish these reductions in an efficient and cost-effective manner. The 2019 CAP Update establishes GHG emission reduction programs and regulations that correlate with and support evolving state GHG emissions reduction goals and strategies. The CAP Update includes reduction targets for year 2030 and year 2050. These reduction targets require the County to reduce emissions by at least 525,511 $MTCO_2e$/yr below the Adjusted Business As Usual (ABAU) scenario by 2030 and at least 2,982,948 $MTCO_2e$/yr below the ABAU scenario by 2050. To evaluate consistency with the CAP Update, the County has implemented CAP Update Screening Tables (Screening Tables) to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated in development projects. To this end, the Screening Tables establish

categories of GHG Implementation Measures. Under each Implementation Measure category, mitigation or project design features (collectively "features") are assigned point values that correspond to the minimum GHG emissions reduction that would result from each feature. Projects that yield at least 100 points are considered to be consistent with the GHG emissions reduction quantities anticipated in the County's GHG Technical Report and support the GHG emissions reduction targets established under the CAP Update. The potential for such projects to generate direct or indirect GHG emissions that would result in a significant impact on the environment; or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG would be considered less than significant.

### 4.8.3 Basis for Determining Significance

In order to assess the significance of a proposed Project's environmental impacts it is necessary to identify quantitative or qualitative thresholds which, if exceeded, would constitute a finding of significance. As discussed above, while estimated Project-related GHG emissions can be quantified, the direct impacts of such emissions on GCC and global warming cannot be determined on the basis of available science. There is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly or indirectly affect the global climate.

AB 32 states, in part, that "[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California." Because global warming is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project would have no potential to result in a direct impact to global warming; rather, Project-related contributions to GCC, if any, only have potential significance on a cumulative basis. Therefore, the analysis below focuses on the Project's potential to contribute to GCC in a cumulatively-considerable way.

Section VIII of Appendix G to the CEQA Guidelines indicates that a project would result in a significant impact on climate change if a project were to:

- *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

The following thresholds are derived directly from Section VIII of Appendix G to the State CEQA Guidelines and the County's Environmental Assessment form, and address typical adverse effects associated with GHG emissions. The proposed Project would have a significant impact on GHG emissions if the Project or any Project-related component would:

a. *Generate GHGs, either directly or indirectly, that may have a significant impact on the environment; or*

b. *Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.*

The above-listed thresholds for GHGs do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the State CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA. With respect to GHG emissions, State CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The State CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or other performance-based standards." A lead agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change." Section 15064.4(b) provides that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment:

1. The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
3. The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4(b)).

In addition, Section 15064.7(c) of the State CEQA Guidelines specifies that "[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." The State CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analyses. As a note, the State CEQA Guidelines were amended in response to SB 97. In particular, the State CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per State CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans, [and] plans or regulations for the reduction of greenhouse gas emissions." Put another way, State

CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

The significance of the Project's GHG emissions is evaluated consistent with State CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The Riverside County 2019 CAP Update aims to reduce GHG emissions from development projects under County jurisdiction. The CAP Update builds on State and regional policies aimed at reducing GHG emissions consistent with the SB 32 2030 GHG reduction target and Statewide post-2030 reduction goals. The CAP Update identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 $MTCO_2e$/yr is used to determine if additional analysis is required. Projects that exceed 3,000 $MTCO_2e$/yr will be required to quantify and disclose the anticipated GHG emissions then either 1) demonstrate GHG emissions at project buildout year levels of efficiency and include project design features and/or mitigation measures to reduce GHG emissions or 2) garner 100 points through the CAP Update Screening Tables.

To evaluate consistency with the CAP Update, the County of Riverside has implemented CAP Update Screening Tables (Screening Tables) to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated in development projects. To this end, the Screening Tables establish categories of GHG Implementation Measures. Under each Implementation Measure category, mitigation or project design features (collectively "features") are assigned point values that correspond to the minimum GHG emissions reduction that would result from each feature. Projects that yield at least 100 points are considered to be consistent with the GHG emissions reduction quantities anticipated in the County of Riverside's GHG Technical Report and support the GHG emissions reduction targets established under the CAP Update. The potential for such projects to generate direct or indirect GHG emissions that would result in a significant impact on the environment would be considered to have a less-than-significant impact due to GHG emissions. (Urban Crossroads, 2025c, p. 43)

### 4.8.4 Impact Analysis

| **Threshold a.: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?** |
|---|

#### *1. Construction Emissions*

Project construction activities would generate $CO_2$, $N_2O$, and $CH_4$ emissions. The Project's Air Quality Impact Analysis ("AQIA"; *Technical Appendix B1* to this EIR) contains detailed information regarding Project construction activities. As discussed in the AQIA, construction related emissions are expected from the following construction activities: site preparation, grading, building construction, paving, and architectural coating. (Urban Crossroads, 2025c, p. 47)

The anticipated construction duration by phase, as well as a list of construction equipment assumed in the analysis, previously were described in EIR subsection 3.6.1.

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 4.8-3, *Project Construction GHG Emissions*. (Urban Crossroads, 2025c, p. 50)

**Table 4.8-3 Project Construction GHG Emissions**

| Year | Emissions (MT/yr) | | | | |
|---|---|---|---|---|---|
| | $CO_2$ | $CH_4$ | $N_2O$ | Refrigerants | Total $CO_2e$[1] |
| 2025 | 237.93 | 0.01 | 0.00 | 0.01 | 238.86 |
| 2026 | 2622.87 | 0.09 | 0.06 | 0.72 | 2642.63 |
| 2027 | 1680.86 | 0.05 | 0.06 | 1.02 | 1701.80 |
| 2028 | 1453.77 | 0.04 | 0.06 | 0.95 | 1473.97 |
| 2029 | 903.89 | 0.02 | 0.04 | 0.57 | 916.78 |
| 2030 | 2.90 | 0.00 | 0.00 | 0.00 | 2.94 |
| Total GHG Emissions | 6902.23 | 0.22 | 0.22 | 3.27 | 6976.98 |
| **Amortized Construction Emissions** | **230.07** | **7.23E-03** | **7.39E-03** | **1.09E-01** | **232.57** |

1. CalEEMod reports the most common GHGs emitted which include $CO_2$, $CH_4$, $N_2O$, and Refrigerants. These GHGs are then converted into the $CO_2e$ by multiplying the individual GHG by the GWP.

Source: CalEEMod annual construction-source emissions are presented in Appendices 3.1 through 3.4 to the Project's GHGA (*Technical Appendix G*).
(Urban Crossroads, 2025c, Table 3-3)

### *2. Operational Emissions*

Operational activities associated with the Project would result in emissions of $CO_2$, $CH_4$, $N_2O$, and Refrigerant emissions from the following primary sources: Area Source Emissions, Energy Source Emissions, Mobile Source Emissions, Solid Waste, Refrigerants, Water Supply, Treatment, and Distribution. Each is discussed below. (Urban Crossroads, 2025c, p. 51)

#### *Area Source Emissions*

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that on October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by January 1, 2024, which is now effective. For purposes of analysis, the emissions associated with landscape

maintenance equipment were calculated based on assumptions provided in CalEEMod. (Urban Crossroads, 2025c, p. 51)

***Energy Source Emissions***

Combustion Emissions Associated with Natural Gas and Electricity

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits $CO_2$ and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Natural gas and electricity usage associated with the Project was calculated by CalEEMod using default parameters. (Urban Crossroads, 2025c, p. 51)

**Mobile Source Emissions**

The Project related GHG emissions derive primarily from vehicle trips generated by the Project, including residential trips to and from the site associated with the proposed uses. Trip characteristics available from the Project's Traffic Analysis ("TA"; EIR *Technical Appendix L2*) were utilized in the analysis. (Urban Crossroads, 2025c, p. 51)

***Water Supply, Treatment, and Distribution***

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod default parameters were used. (Urban Crossroads, 2025c, p. 52)

***Solid Waste***

The proposed land uses would result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by CalEEMod using default parameters. (Urban Crossroads, 2025c, p. 52)

***Refrigerants***

Air conditioning (A/C) and refrigeration equipment associated with the Project are anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use subtype based on industry data from the USEPA. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Note that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. Per 17 CCR 95371, new facilities with refrigeration equipment containing more than 50 pounds of refrigerant are prohibited from

utilizing refrigerants with a GWP of 150 or greater as of January 1, 2022. Additionally, beginning January 1, 2025, all new air conditioning equipment may not use refrigerants with a GWP of 750 or greater. GHG emissions associated with refrigerants were calculated by CalEEMod using default parameters. (Urban Crossroads, 2025c, p. 52)

### ❑ Emissions Summary

The estimated Project-related GHG emissions are summarized in Table 4.8-4, *Project GHG Emissions*. Detailed operation model outputs for the Project are presented in Appendices 3.5 and 3.6 of the Project's GHGA (*Technical Appendix G)*. As shown in Table 4.8-4, construction and operation of the Project would generate approximately 4,045.37 $MTCO_2e$/yr for Phase 1 and 10,004.48 $MTCO_2e$/yr at Project Buildout. (Urban Crossroads, 2025c, p. 52)

**Table 4.8-4 Project GHG Emissions**

| Phase | Emission Source | Emissions (MT/yr) | | | | |
|---|---|---|---|---|---|---|
| | | $CO_2$ | $CH_4$ | $N_2O$ | Refrigerant | Total $CO_2e$ |
| 1 | Annual construction-related emissions amortized over 30 years | 123.90 | 0.00 | 0.00 | 0.03 | 124.75 |
| | Mobile Source | 2864.71 | 0.12 | 0.14 | 3.74 | 2912.43 |
| | Area Source | 71.16 | 0.00 | 0.00 | 0.00 | 71.25 |
| | Energy Source | 797.26 | 0.07 | 0.01 | 0.00 | 800.60 |
| | Water Usage | 49.72 | 0.37 | 0.01 | 0.00 | 61.79 |
| | Waste | 21.17 | 2.12 | 0.00 | 0.00 | 74.07 |
| | Refrigerants | 0.00 | 0.00 | 0.00 | 0.48 | 0.48 |
| **Total $CO_2e$ (All Sources)** | | **4,045.37** | | | | |
| Project Buildout | Annual construction-related emissions amortized over 30 years | 230.07 | 7.23E-03 | 7.39E-03 | 1.09E-01 | 232.57 |
| | Mobile Source | 7434.21 | 0.29 | 0.35 | 7.90 | 7552.70 |
| | Area Source | 177.64 | 0.00 | 0.00 | 0.00 | 177.86 |
| | Energy Source | 1679.06 | 0.17 | 0.01 | 0.00 | 1687.07 |
| | Water Usage | 86.40 | 0.93 | 0.02 | 0.00 | 116.46 |
| | Waste | 67.63 | 6.76 | 0.00 | 0.00 | 236.62 |
| | Refrigerants | 0.00 | 0.00 | 0.00 | 1.22 | 1.22 |
| **Total $CO_2e$ (All Sources)** | | **10,004.48** | | | | |

Source: CalEEMod output, See Appendices 3.5 and 3.6 to the Project's GHGA (*Technical Appendix G*) for detailed model outputs.
(Urban Crossroads, 2025c, Table 3-4)

### ❑ Evaluation of Project Impacts Due to GHGs

As shown in Table 4.8-4, the Project as proposed would result in 10,004.48 $MTCO_2e$ per year ($MTCO_2e$/yr) at buildout. This would exceed the County of Riverside's Climate Action Plan (CAP) screening threshold of 3,000 $MTCO_2e$/yr, indicating the potential for a cumulatively considerable impact related to greenhouse gas (GHG) emissions. Although the Project would be required to achieve 100 points pursuant to the CAP

Screening Tables, and in order to provide a conservative analysis of the Project's impacts due to GHGs, it is concluded that the Project's cumulatively-considerable impacts due to GHG emissions would be potentially significant prior to mitigation. (Urban Crossroads, 2025c, pp. 52-54)

**Threshold b.: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Pursuant to Section 15064.4 of the State CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. Project consistency with SB 32 and the County's CAP Update is evaluated below.

❑ **Project Consistency with SB32/CARB 2022 Scoping Plan Update**

The 2022 Scoping Plan reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32, and lays out a path to achieve targets for carbon neutrality and to reduce GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279. Some of the current transportation sector policies the Project would comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, Off-Road Zero-Emission Targeted Manufacturer Rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. As noted below, the Project also would be consistent with the Riverside County CAP (following mitigation). (Urban Crossroads, 2025c, pp. 54-55)

In addition, and as shown in Table 4.8-5, *Project Compliance with 2022 Scoping Plan Actions and Strategies*, the proposed Project would be consistent with or otherwise would not conflict with any of the Scoping Plan actions or strategies. As such, the Project would not be inconsistent with the 2022 Scoping Plan, and impacts would be less than significant.

❑ **Project Consistency with Riverside County CAP Update**

The County of Riverside approved the CAP Update on December 17, 2019. The CAP Update was designed under the premise that the County, and the community it represents, is uniquely capable of addressing emissions associated with sources under Riverside County's jurisdiction, and that Riverside County's emission reduction efforts should coordinate with the state strategies of reducing emissions in order to accomplish these reductions in an efficient and cost-effective manner. Because the County of Riverside CAP Update addresses GHG emissions reductions and is consistent with the requirements of AB 32, SB 32, and international efforts to reduce GHG emissions, compliance with the CAP Update fulfills the description of mitigation found in the State CEQA Guidelines. (Urban Crossroads, 2025c, p. 55)

**Table 4.8-5 Project Compliance with 2022 Scoping Plan Actions and Strategies**

| Actions and Strategies | Potential to Conflict |
|---|---|
| Increase in Renewable Energy and Decrease in Oil and Gas Use Actions | No Conflict. The Project supports their strategy by incorporating on-site PV systems (as required pursuant to Mitigation Measure MM 4.8-1) that offset a portion of operational electricity demand and reduce reliance on fossil fuel-based energy sources. The Project does not involve oil and gas production, refining, or related activities and would not conflict with Statewide efforts to reduce oil and gas use. |
| Low Carbon Fuels Actions | No Conflict. The Project does not include fuel production, refining, or distribution infrastructure. Project operations would occur within the Statewide regulatory framework that advances low-carbon fuels, and the Project would not impede implantation of these actions. |
| Expansion of Electrical Infrastructure Actions | No Conflict. The Project's on-site PV supports distributed energy strategies that can reduce grid demand. Any needed electrical service improvements would occur consistent with applicable codes and utility requirements, and the Project would not impede electrical infrastructure expansion. |
| Climate Ready and Climate-Friendly Buildings | No Conflict. New structures would comply with applicable building code and Title 24 energy efficiency requirements, supporting reduced building energy demand. The Project would not interfere with Statewide building electrification and efficiency objectives. |
| Expanded Use of Zero-Emission Mobile Source Technology Actions | No Conflict. The Project does not include vehicle manufacturing or large fleet operations. As such, the Project would not impede implementation of these actions. |
| Mechanical Carbon Removal and Carbon Capture and Sequestration Actions | No Conflict. The Project does not include industrial stationary sources of $CO_2$ capture/ sequestration infrastructure. This action is not applicable to the Project, and the Project would not preclude Statewide carbon removal/carbon capture and sequestration implementation. |
| Improvements to Oil and Gas Facilities Actions | No Conflict. The Project does not include oil and gas facilities or related infrastructure. This action is not applicable, and the Project would not interfere with Statewide efforts to improve or decommission oil and gas facilities. |
| Manure Management Actions | No Conflict. The Project would consist of residential uses, and would not be associated with the extensive use of manure on site. As such, the Project would not impede Statewide manure management actions. |
| Reduced High-GWP Fluorinated Gases Actions | No Conflict. For any new conditioned spaces, the Project would be subject to applicable State/federal refrigerant and heating, ventilation, and air conditioning equipment requirements, supporting reductions in high-GWP refrigerants. The Project would not impede implementation of this action. |
| Forest, Shrubland, and Grassland Management Actions | No Conflict. The Project does not include forest/shrubland/grassland management actions of the type addressed by this strategy. This action is not applicable, and the Project would not interfere with Statewide land management programs. |
| Agricultural Actions | No Conflict. The Project does not include commercial agricultural operations that are addressed by the climate-smart agriculture actions. This action is not applicable, and the Project would not impede Statewide agricultural emissions reduction strategies. |
| Organic Waste Diversion and Composing Actions | No Conflict. The Project would comply with the applicable state and local solid waste and organic waste diversion requirements, supporting $CH_4$ reduction goals. The Project would not conflict with organic waste diversion and composting actions. |
| Afforestation, Urban Forestry Expansion, Urban Greening, Avoided Natural and Working Land Use Conversion, and Wetland Restoration Actions | No Conflict. The Project does not include afforestation of wetland restoration components. Any landscaping would be limited in scale and would not interfere with Statewide sequestration and restoration strategies. |
| Offshore Wind Actions | No Conflict. The Project does not involve marine development energy generation infrastructure or transmission facilities. Therefore, this action is not applicable, and the Project would not conflict with implementation of offshore wind development strategies. |
| Reduced VMT Actions | No Conflict. The Project does not involve land use changes of a type or scale that would impede regional Vehicle Miles Traveled (VMT) reduction programs. The Project would not conflict with implementation of reduced VMT actions. |

In order to evaluate consistency with the CAP Update, the County provided Screening Tables to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. The County's CAP currently evaluates and quantifies reductions out to Year 2030. The CAP states that "[t]hrough 2050, Riverside County would continue implementation of the Screening Tables. During this time, the reduction measures implemented through the Screening Tables would continue to reduce GHG missions from new development. Additionally, it is assumed that the State measures would keep being updated and reinforced to further reduce emissions. With these assumptions, Riverside County's emissions would decrease to a level below the reduction target by 2050" (Riverside County, 2019, p. 6-2) Thus, compliance with the CAP Update would serve to meet and support the reduction targets established Senate Bill 32 and the CARB 2022 Scoping Plan.

Pursuant to the CAP Update and associated Screening Tables, projects that garner at least 100 points (equivalent to an approximate 49% reduction in GHG emissions below 2008 baseline levels) are determined to be consistent with the reduction quantities anticipated in the County's GHG Technical Report, and consequently would be consistent with the CAP. Absent implementation of Screening Table Measures, the Project could be considered inconsistent with the County CAP. This is a potentially significant impact for which mitigation is required.

### 4.8.5 Cumulative Impact Analysis

As discussed in subsection 4.8.3, there is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly or indirectly affect the global climate. As such, Project impacts due to GHG emissions are inherently cumulative in nature.

As discussed under the analysis of Threshold a., the Project would result in approximately 10,004.48 $MTCO_2e$ per year at buildout, which exceeds the County of Riverside's Climate Action Plan (CAP) screening threshold of 3,000 $MTCO_2e$/year. Other cumulative developments within the region similarly have the potential to exceed the County's screening threshold of 3,000 MTCO2e/yr. Accordingly, GHG emissions associated with construction and long-term operation of the Project represents a cumulatively-considerable impact for which mitigation would be required.

As discussed under the analysis of Threshold b., the Project would be consistent with the California Air Resources Board's (CARB) 2022 Scoping Plan, which outlines the State's strategy for achieving carbon neutrality by 2045. The Project would implement Mitigation Measure GHG-1, which requires compliance with the County's CAP Screening Tables by achieving at least 100 points in GHG reduction measures. Because the County's CAP Update is aligned with the State's GHG reduction goals set forth in the 2022 Scoping Plan and SB 32, compliance with the CAP Screening Table ensures consistency with both local and State climate action policies. Therefore, the Project would not result in a cumulatively considerable impact on GHG reduction plans at the local or state level.

### 4.8.6 Significance of Impacts Before Mitigation

Threshold a: Significant Direct and Cumulatively-Considerable Impact. As discussed under the analysis of Threshold a., the County of Riverside's CAP Update establishes a three-step process to evaluate GHG emissions at the project level. Projects that exceed the CAP screening threshold of 3,000 $MTCO_2e$ per year must demonstrate consistency with the CAP by implementing measures from the CAP Screening Tables totaling at least 100 points. As shown in Table 4.8-4, the Project would generate approximately 10,004.48 $MTCO_2e$ per year, which would exceed the 3,000 $MTCO_2e$/year screening threshold. Although the Project would be required to achieve 100 points pursuant to the CAP Screening Tables, and in order to provide a conservative analysis of the Project's impacts due to GHGs, it is concluded that the Project's cumulatively-considerable impacts due to GHG emissions would be potentially significant prior to mitigation.

Threshold b: Significant Direct and Cumulatively-Considerable Impact. The Project would be consistent with or otherwise would not conflict with the CARB 2022 Scoping Plan. However, the Project has the potential to conflict with the Riverside County CAP Update if the Project were unable to achieve 100 points pursuant to the CAP Screening Tables. This is evaluated as a cumulatively-considerable impact of the proposed Project for which mitigation would be required.

### 4.8.7 Regulations, Design Requirements, and Mitigation

***Regulations and Design Requirements***

The Project would be required to comply with all mandates imposed by the State of California and SCAQMD aimed at the reduction of air quality emissions. Those that are applicable to the Project and that would assist in the reduction of greenhouse gas emissions are listed below:

- Global Warming Solutions Act of 2006 (AB32)
- Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles.
- Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020.
- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions.
- Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020.
- Senate Bill 32 (SB 32). Requires the state to reduce statewide greenhouse gas emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15.

***Mitigation***

MM 4.8-1 Prior to issuance of building permits, and in accordance with measure R2-CE1 of the County's Climate Action Plan (CAP) Update, future implementing building permits that involve more than 75 new dwelling units of residential development or one or more new buildings totaling more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development shall be required to offset the energy demand through

renewable energy production. Renewable energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development, meet or exceed 20% of energy demand for multi-family residential development, and meet or exceed 30% of energy demand for single-family residential development.

MM 4.8-2 Prior to issuance of building permits for any of the Project's residential uses, the Project Applicant shall demonstrate that appropriate building construction measures shall apply to achieve a minimum of 100 points per Appendix D to the Riverside County 2019 Climate Action Plan (CAP) Update. The conceptual measures anticipated for the Project are listed in Table ES-2 of the Project's Greenhouse Gas Analysis (GHGA) technical report (appended to the Project's EIR as *Technical Appendix G*). The conceptual measures may be replaced with other measures as listed in Appendix D to the 2019 Riverside County CAP Update, as long as they are replaced at the same time with other measures that in total achieve a minimum of 100 points per Appendix D to the 2019 Riverside County CAP Update. The County shall verify implementation of the identified measures prior to final building inspection.

### 4.8.8 Significance of Impacts After Mitigation

Threshold a: Less Than Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.8-1 would ensure that the Project complies with CAP Update Measure R2-CE1 by requiring the Project Applicant to offset the Project's energy demands through on-site renewable energy production. Mitigation Measure MM 4.8-2 would require the Project to incorporate GHG reduction measures from the County of Riverside's CAP Screening Tables totaling at least 100 points. Mitigation Measure MM 4.8-2 would ensure consistency with the CAP Update's efficiency requirements for projects that exceed the 3,000 $MTCO_2e$/year screening threshold. Because the CAP Update is aligned with statewide GHG reduction goals under SB 32 and the 2022 Scoping Plan, compliance with Mitigation Measures MM 4.8-1 and MM 4.8-2 would reduce the Project's GHG emissions to a level that is not cumulatively considerable. Therefore, with implementation of mitigation, impacts related to GHG emissions would be reduced to a less-than-significant level.

Threshold b: Less Than Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.8-1 would ensure that the Project complies with CAP Update Measure R2-CE1 by requiring the Project Applicant to offset the Project's energy demands through on-site renewable energy production. Mitigation Measure MM 4.8-2 would require the Project to incorporate GHG reduction measures from the County of Riverside's CAP Screening Tables totaling at least 100 points. With implementation of with Mitigation Measures MM 4.8-1 and MM 4.8-2, the proposed Project would be fully consistent with the County's CAP Update, and the Project's impacts due to a potential conflict with the CAP Update would be reduced to less-than-significant levels. Because the CAP Update is aligned with the State's GHG reduction goals outlined in SB 32 and the 2022 Scoping Plan, compliance with Mitigation Measures MM 4.8-1 and MM 4.8-2 would ensure the Project does not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, with mitigation, impacts related to plan consistency would be reduced to a less-than-significant level.

### 4.8.9 References


| Cited As | Reference |
|---|---|
| CARB, 2022 | California Air Resources Board, 2022. *2022 Scoping Plan for Achieving Carbon Neutrality*. December 2022. Accessed June 19, 2025. Available on-line at: https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf |
| Riverside County, 2019 | Riverside County, 2019. *County of Riverside Climate Action Plan Update*. November 2019. Accessed June 19, 2025. Available on-line at: https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-CAP-2019-2019-CAP-Update-Full.pdf |
| Urban Crossroads, 2025c | Urban Crossroads, Inc., 2025c. *Keller Crossing Specific Plan Greenhouse Gas Analysis County of Riverside.* April 3, 2025. Included as EIR *Technical Appendix G*. |

# 4.9 HAZARDS AND HAZARDOUS MATERIALS

The information and analysis presented in this subsection is based on two environmental site assessments prepared for the Project site. A Phase I Environmental Site Assessment (, herein, "Phase I ESA"), dated July 27, 2020, was prepared by Tetra Tech and is included as *EIR Technical Appendix H1* (Tetra Tech, 2020). The Phase I ESA includes a review of historical aerial photographs, regulatory database searches, agency file reviews, and a site reconnaissance to identify potential recognized environmental conditions (RECs). In addition, and based on findings related to historical agricultural activities and the documented application of Class A biosolids, a follow-up Limited Phase II Environmental Site Assessment (herein, "Phase II ESA") was prepared by Tetra Tech. The results of this analysis are documented in a report titled "Limited Phase II Investigation, Keller Crossing," dated December 31, 2024, and included as EIR *Technical Appendix H2* (Tetra Tech, 2024). Refer to Section 7.0, *References*, for a complete list of reference sources.

## 4.9.1 Existing Conditions

### A. Definition of Toxic Substances and Hazardous Waste

For purposes of this EIR, the term "toxic substance" is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may present an unreasonable risk of injury to human health or the environment. Toxic substances include: chemical, biological, flammable, explosive, and radioactive substances.

"Hazardous material" is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may: 1) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, disposed of, or otherwise mismanaged; or 2) cause or contribute to an increase in mortality or an increase in irreversible or incapacitating illness.

Hazardous waste is defined in the California Code of Regulations, Title 22, § 66261.3. The defining characteristics of hazardous waste are: ignitability (oxidizers, compressed gases, and extremely flammable liquids and solids), corrosivity (strong acids and bases), reactivity (explosives or generates toxic fumes when exposed to air or water), and toxicity (materials listed by the United States Environmental Protection Agency [USEPA] as capable of inducing systemic damage to humans or animals).

Certain wastes are called "Listed Wastes" and are found in the California Code of Regulations, Title 22, §§ 66261.30 through 66261.35. Wastes appear on the lists because of their known hazardous nature or because the processes that generate them are known to produce hazardous wastes (which are often complex mixtures).

A Recognized Environmental Condition (REC) means the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the

environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

### B. Historical Review, Regulatory Review, and Field Reconnaissance

As part of the Project's Phase I ESA (*Technical Appendix H1*), Tetra Tech conducted a site walk to document the current condition of the Project site and neighboring facilities; a review of a regulatory databases; a review of previously-prepared reports for the Project site; questionnaires to the current property owner; a review of historical references including aerial photographs, city directories, and topographic maps; on-line research and file review requests concerning the Project site and suspect off-site sources at the Department of Toxic Substances Control (DTSC) websites; a review of records maintained by the Riverside County Department of Environmental Health; and a review of building records and blueprints of the former Site buildings maintained by Riverside County. As part of the Project's Phase II ESA, soil borings were installed, logged, and sent to a laboratory to be analyzed for volatile organic compounds (VOCs) pursuant to United States Environmental Protection Agency (EPA) Method 8260, semi-volatile organic compounds (SVOCs) pursuant to EPA Method 8270, Total Petroleum Hydrocarbons (TPHs) Gasoline Range Organics (GRO) and Diesel Range Organics (DRO) pursuant to California Method CA-GRO and CA-DRO, herbicides pursuant to EPA Method 8151, organophosphorus pesticides (OPPs) pursuant to EPA Method 8141, organochlorinated pesticides (OCPs) pursuant to EPA Method 8081, and Resource Conservation and Recovery Act (RCRA) 8 metals pursuant to EPA Method 6010/7040 (Tetra Tech, 2024, p. 2). The findings of the Phase I ESA and Phase II ESA are summarized below.

#### *1. Historical Review*

Tetra Tech's review of historical aerial photographs (dated 1949, 1953, 1961, 1967, 1978, 1985, 1989, 1996, 2002, 2006, 2009, 2012, and 2016), as documented in the 2020 Phase I Environmental Site Assessment (ESA) (Technical Appendix H1), indicates that the Project site has been used primarily for agricultural purposes since at least 1949. The aerials depict hilly terrain primarily in the northeastern portion of the site, with scattered stream channels and generally undeveloped conditions. No prior uses of the site were identified that would constitute an REC. (Tetra Tech, 2020, pp. ES-2)

Based on the review of readily available historical aerial photographs, the areas surrounding the Project site appear to consist of undeveloped or agricultural land with scattered rural residential properties in the 1949 through 2002 aerial photographs. Highway 79 is also visible to the adjacent east in all reviewed aerial photographs. Beginning in the 1996 aerial photograph, a nursey is also visible to the southeast. By the 2006 aerial photograph, a residential subdivision also appears to the southeast. The areas surrounding the target property appear relatively unchanged in the remaining aerial photographs. Tetra Tech did not identify a previous use of the surrounding properties that would represent a REC to the Project site. (Tetra Tech, 2020, p. ES-2)

Based on the historical agricultural use of the Project site and surrounding areas, it is possible that environmentally persistent pesticides have been applied to crops grown on or around the site. However, the normal use and application of agricultural chemicals generally does not trigger enforcement actions,

assessments by regulatory agencies, or the recommendation for further assessment of the Project site unless there is evidence indicating that misuse, dumping, or improper storage of chemicals is present or has occurred. There are no indications of these types of activities or evidence of agricultural chemical mixing, large quantity storage, or materials processing located on or around the Project site. (Tetra Tech, 2020, pp. ES-2 and ES-3)

### *2. Regulatory Review*

Tetra Tech contracted Environmental Data Resources, Inc. (EDR) to perform a database search of information published by local, State, and federal regulatory agencies relative to the target property and adjacent and surrounding properties. Tetra Tech's review of available regulatory information and area reconnaissance did not indicate on-site or off-site RECs or vapor encroachment conditions (VECs) for the target property. Refer to the Project's Phase I ESA (*Technical Appendix H1*) for a description of facilities identified in the EDR Radius Map Report within two miles of the Project site, none of which represent an REC for the Project site. (Tetra Tech, 2020, pp. ES-10)

### *3. Site Reconnaissance*

At the time of the site reconnaissance, the majority of the Project site consisted of agricultural land with hilly terrain primarily on the northeastern and northwestern portions. In addition, a suspected intermittent stream was noted within the northeastern portion. A stormwater outlet also was observed on the northeastern portion of the site, as well as on the west-central portion. Overhead electrical powerlines were observed along the southern and western Project boundaries. Two pole-mounted transformers were observed along the southern boundary, while one was observed on the northwestern portion of the Project site. The transformers were not labeled for polychlorinated biphenyl (PCB) content but were observed to be in good condition with no evidence of leaks or staining. Debris consisting of a bumper and car seat also were observed on the northwestern portion, while wind-blown trash was observed throughout the Project boundaries. No staining, distressed vegetation, or other concerns were noted in association with the debris. No active earthwork or site development activities were observed at the Project site during the site reconnaissance. (Tetra Tech, 2020, pp. ES-1 and ES-2)

The Project site is bordered to the north by vacant land and rural residences, with Scott Road beyond. To the east, the Project site is bordered by Highway 79 with vacant land, rural residences, and agricultural land beyond. The Project site is bordered to the south by Keller Road with rural residences beyond. To the west, the Project site is bordered by Pourroy Road with vacant land and rural residences beyond. (Tetra Tech, 2020, p. ES-2)

Tetra Tech's site reconnaissance revealed no evidence of RECs for the Project site (Tetra Tech, 2020, p. ES-2).

### *4. Soil Sampling and Phase II ESA Results*

In September 2024, Tetra Tech mobilized to the Project site to conduct the field work associated with the limited subsurface assessment. The agricultural fields, which have consisted of approximately 135 acres

since 2016, were subdivided into 27 five-acre units (Areas 1 through 27). Five soil borings (approximately 1 per acre) were installed via hand auger to a depth of 2 feet below ground surface (bgs) in each of the 5-acre units, for a total of 135 soil borings. From each soil boring, two discrete soil samples were collected: one from 0 to 0.5 feet below ground surface (bgs) and one from 1 to 2 feet bgs, for a total of 270 discrete soil samples. The soil borings were continuously logged and inspected for signs of a release, including visual and olfactory inspection and screening with a photoionization detector (PID). No elevated PID readings or evidence of release was observed in the installed borings. In addition, one five-point composite surface soil sample was collected from 0 to 0.5 feet bgs from each 5-acre unit, for a total of 27 composite surface soil samples. A Sample Location Map is provided as Exhibit 1 to the Project's Phase II ESA (*Technical Appendix H2*). (Tetra Tech, 2024, p. 2)

As noted in Table 1 in Exhibit 2 of the Project's Phase II ESA (*Technical Appendix H2*), analytical results for the composite soil samples collected revealed detectable concentrations of several metals, VOCs, PAHs, one herbicide, and TPH. All detected concentrations were determined to be below their applicable Southern California Background Arsenic Concentration, Note 3 Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office (HERO) Human Health Risk Assessment (HHRA) Screening Levels for Residential Soil Cancer Endpoints/Soil Non-Cancer Endpoints, San Francisco Bay Regional Water Quality Control Board (SFBRWCB) Tier 1 Residential Shallow Soil Exposure Environmental Screening Levels (ESLs), and SFBRWCB Tier 1 Leaching to Groundwater Levels for Drinking Water and Non-Drinking Water, with the exception of arsenic and PAHs in the samples collected from Area 2 and Area 19, respectively. (Tetra Tech, 2024, p. 3)

Arsenic was detected in the Area 2 composite soil sample (AREA 2-COMP) at a concentration of 13.1 milligrams per kilogram (mg/kg), which exceeds the applicable Southern California Background Arsenic Concentration of 12 mg/kg. The PAHs benzo(a)pyrene and dibenz(a,h)anthracene were detected at concentrations of 0.288 mg/kg and 0.0416 mg/kg, respectively, in the Area 19 composite soil sample (AREA 19-COMP). The detected benzo(a)pyrene concentration exceeded both the applicable Note 3 DTSC HERO HHRA Screening Level for Residential Soil Cancer Endpoint and the applicable SFBRWCB Tier 1 Residential Shallow Soil Exposure ESL of 0.11 mg/kg, while the detected dibenz(a,h)anthracene concentration exceeded the Note 3 DTSC HERO HHRA Screening Level for Residential Soil Cancer Endpoint of 0.028 mg/kg. (Tetra Tech, 2024, p. 3)

However, according to the laboratory quality control (QC) data, the associated batch QC was outside the established quality control range for accuracy. Therefore, the sample was reanalyzed due to QC failure. PAHs were non-detect in the reanalysis of sample AREA 19-COMP, which is in line with the other 26 areas analyzed as part of this assessment. Based on the data quality of the initial run and the results of the reanalysis being reflective of the site conditions reported for the remainder of the site, the initial run results are considered anomalous, and the PAHs in Area 19 are considered to be non-detect. (Tetra Tech, 2024, p. 3)

Based on the arsenic exceedances reported in the AREA 2-COMP sample, Tetra Tech released the five discrete soil samples collected from this area from 0 to 0.5 feet bgs. Analytical results for the discrete

samples revealed detectable concentrations of arsenic ranging from 11.8 mg/kg to 18.5 mg/kg, with four out of the five samples exhibiting concentrations above the Southern California Background Arsenic Concentration of 12 mg/kg. (Tetra Tech, 2024, p. 3)

At this point, DHI indicated to Tetra Tech that Area 2 of the target property was to be located within a conservation area of the proposed development as part of the Riverside County Multi Species Habitat Conservation Plan, specifically Criteria Cell 5173. This Cell is approximately 159.15 acres and will contribute to assembly of Proposed Constrained Linkage 17. Conservation within this Cell will reportedly be focused on chaparral habitat and agricultural land. Areas conserved within this Cell will be connected to grassland habitat proposed for conservation in Cell 5175 located to the west, to chaparral and coastal sage scrub habitat proposed for conservation in Cell Group U located to the north, and to chaparral habitat proposed for conservation in Cell 5169 to the east. Conservation within this Cell will range from 20 to 30 percent of the Cell focusing on the northern portion of the Cell. (Tetra Tech, 2024, p. 4)

Based on the data provided by the United States Geological Survey (USGS) arsenic concentrations for the County of Riverside range from 0.603 mg/kg to 39.294 mg/kg. The arsenic concentrations detected in Area 2 are within this range. Therefore, based on the intended use of this area and background arsenic range identified by the USGS, Tetra Tech concluded that the arsenic concentrations identified within Area 2 of the target property do not warrant further investigation. The results of laboratory analysis of the composite and discrete samples are summarized in Table 1 in Exhibit 2 of the Project's Phase II ESA (*Technical Appendix H2*). A copy of the laboratory data package is provided as Exhibit 3 to the Phase II ESA. The results of the assessment indicated that arsenic concentrations detected in shallow soils in Area 2 are within typical background concentrations for the County of Riverside. Furthermore, Area 2 is located within a proposed conservation area and therefore, Tetra Tech concluded that no additional assessment is warranted. (Tetra Tech, 2024, p. 3)

#### C. Airport Hazards

The Project site is not located within two miles of a public airport or within an airport land use plan. The closest airport is the French Valley Airport located roughly 3.3 miles southwest of the Project site. According to Map CO-1 of the Riverside County Airport Land Use Compatibility Plan Policy Document, the Project site is located outside of the compatibility zones for the French Valley Airport, indicating that the Project site is not subject to airport-related hazards. (RCALUC, 2012) Additionally, the Project site is located approximately 0.9 miles southeast of Pines Airpark, which formerly was a private airport located within the County of Riverside. However, the Conditional Use Permit (CUP) for the Pines Airpark (CUP 3078 Revision No. 3) was withdrawn on November 15, 2016, and the previously-approved CUP was allowed to expire (Riverside County, 2016). As such, the Pines Airpark is no longer in operation.

### 4.9.2 Applicable Regulatory Requirements

The following is a brief description of the federal, state, and local environmental laws and related regulations related to hazards and hazardous materials.

## A. Hazardous Materials Regulations and Plans

### *1. Federal Regulations*

#### a. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Superfund Amendments and Reauthorization Act (SARA)

The Comprehensive Environmental Response, Compensation, and Liability Act, also known as CERCLA or Superfund, provides a Federal "Superfund" to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, the Environmental Protection Agency (EPA) was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup. EPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, EPA obtains private party cleanup through orders, consent decrees, and other small party settlements. EPA also recovers costs from financially viable individuals and companies once a response action has been completed.

EPA is authorized to implement the Act in all 50 states and U.S. territories. Superfund site identification, monitoring, and response activities in states are coordinated through the state environmental protection or waste management agencies.

The Superfund Amendments and Reauthorization Act (SARA) of 1986 reauthorized CERCLA to continue cleanup activities around the country. Several site-specific amendments, definitions clarifications, and technical requirements were added to the legislation, including additional enforcement authorities. Also, Title III of SARA authorized the Emergency Planning and Community Right-to-Know Act (EPCRA).

#### b. Resource Conservation and Recovery Act (RCRA)

The Resource Conservation and Recovery Act (RCRA) gives EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization and phasing out land disposal of hazardous waste as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.

#### c. Hazardous Materials Transportation Act (HMTA)

The Hazardous Materials Transportation Act of 1975 (HMTA) empowered the Secretary of Transportation to designate as hazardous material any "particular quantity or form" of a material that "may pose an unreasonable risk to health and safety or property."

Hazardous materials regulations are subdivided by function into four basic areas:

- Procedures and/or Policies 49 CFR Parts 101, 106, and 107
- Material Designations 49 CFR Part 172
- Packaging Requirements 49 CFR Parts 173, 178, 179, and 180
- Operational Rules 49 CFR Parts 171, 173, 174, 175, 176, and 177

The HMTA is enforced by use of compliance orders [49 U.S.C. 1808(a)], civil penalties [49 U.S.C. 1809(b)], and injunctive relief (49 U.S.C. 1810). The HMTA (Section 112, 40 U.S.C. 1811) preempts state and local governmental requirements that are inconsistent with the statute, unless that requirement affords an equal or greater level of protection to the public than the HMTA requirement.

### d. Hazardous Materials Transportation Uniform Safety Act of 1990

In 1990, Congress enacted the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) to clarify the maze of conflicting state, local, and federal regulations. Like the HMTA, the HMTUSA requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property.

The statute includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials.

### e. Occupational Safety and Health Act (OSHA)

Congress passed the Occupational and Safety Health Act (OSHA) to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions.

In order to establish standards for workplace health and safety, the Act also created the National Institute for Occupational Safety and Health (NIOSH) as the research institution for OSHA. OSHA is a division of the U.S. Department of Labor that oversees the administration of the Act and enforces standards in all 50 states.

### f. Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.

Various sections of TSCA provide authority to:

- Require, under Section 5, pre-manufacture notification for "new chemical substances" before manufacture
- Require, under Section 4, testing of chemicals by manufacturers, importers, and processors where risks or exposures of concern are found
- Issue Significant New Use Rules (SNURs), under Section 5, when it identifies a "significant new use" that could result in exposures to, or releases of, a substance of concern.
- Maintain the TSCA Inventory, under Section 8, which contains more than 83,000 chemicals. As new chemicals are commercially manufactured or imported, they are placed on the list.
- Require those importing or exporting chemicals, under Sections 12(b) and 13, to comply with certification reporting and/or other requirements.
- Require, under Section 8, reporting and record-keeping by persons who manufacture, import, process, and/or distribute chemical substances in commerce.
- Require, under Section 8(e), that any person who manufactures (including imports), processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment to immediately inform EPA, except where EPA has been adequately informed of such information. EPA screens all TSCA b§8(e) submissions as well as voluntary "For Your Information" (FYI) submissions. The latter are not required by law, but are submitted by industry and public interest groups for a variety of reasons.

### g. Federal Aviation Regulations Part 77

Federal Aviation Regulation (FAR) Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis for:

- Evaluating the effect of the construction or alteration on operating procedures;
- Determining the potential hazardous effect of the proposed construction on air navigation;
- Identifying mitigating measures to enhance safe air navigation; and
- Charting of new objects.

Notification allows the Federal Aviation Administration (FAA) to identify potential aeronautical hazards in advance to prevent or minimize the adverse impacts to the safe and efficient use of navigable airspace. Any person/organization who intends to sponsor any of the following construction or alterations must notify the Administrator of the FAA:

- Any construction or alteration exceeding 200 feet above ground level.

- Any construction or alteration:
    - within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with at least one runway more than 3,200 feet.
    - within 10,000 feet of a public use or military airport which exceeds a 50:1 surface from any point on the runway of each airport with its longest runway no more than 3,200 feet.
    - within 5,000 feet of a public use heliport which exceeds a 25:1 surface.
- Any highway, railroad, or other traverse way whose prescribed adjusted height would exceed that above noted standards.
- When requested by the FAA.
- Any construction or alteration located on a public use airport or heliport regardless of height or location.

Persons failing to comply with the provisions of FAR Part 77 are subject to Civil Penalty under Section 902 of the Federal Aviation Act of 1958, as amended and pursuant to 49 U.S.C. Section 46301(a).

### *2. State Regulations*

#### a. Cal/OSHA and the California State Plan

Under an agreement with OSHA, since 1973 California has operated an occupational safety and health program in accordance with Section 18 of the federal OSHA. The State of California's Department of Industrial Relations administers the California Occupational Safety and Health Program, commonly referred to as Cal/OSHA. The State of California's Division of Occupational Safety and Health (DOSH) is the principal agency that oversees plan enforcement and consultation. In addition, the California State program has an independent Standards Board responsible for promulgating State safety and health standards, and reviewing variances. It also has an Appeals Board to adjudicate contested citations and the Division of Labor Standards Enforcement to investigate complaints of discriminatory retaliation in the workplace.

Pursuant to 29 CFR 1952.172, the California State Plan applies to all public and private sector places of employment in the state, with the exception of federal employees, the United States Postal Service, private sector employers on Native American lands, maritime activities on the navigable waterways of the United States, private contractors working on land designated as exclusively under federal jurisdiction and employers that require federal security clearances. Cal/OSHA is the only agency in the state authorized to adopt, amend, or repeal occupational safety and health standards or orders. In addition, the Standards Board maintains standards for certain things not covered by federal standards or enforcement, including: elevators, aerial passenger tramways, amusement rides, pressure vessels and mine safety training. The Cal/OSHA enforcement unit conducts inspections of California workplaces in response to a report of an industrial accident, a complaint about an occupational safety and health hazard, or as part of an inspection program targeting industries with high rates of occupational hazards, fatalities, injuries or illnesses.

### b. California Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) (Health and Safety Code [HSC], Division 20, Chapter 6.5, Section 25100, et seq.) is the primary hazardous waste statute in California. The HWCL implements RCRA as a "cradle-to-grave" waste management system in the state. It specifies that generators have the primary duty to determine whether their wastes are hazardous and to ensure its proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reuse as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning and broadening requirements for permitting facilities that treat hazardous waste. It also regulates a number of waste types and waste management activities not covered by federal law (RCRA).

### c. California Code of Regulations (CCR), Titles 22 and 26

A variety of California Code of Regulation (CCR) titles address regulations and requirements for generators of hazardous waste. Title 22 contains detailed compliance requirements for hazardous waste generators, transporters, and facilities for treatment, storage, and disposal. Because California is a fully-authorized state according to RCRA, most regulations (i.e., 40 CFR 260, et seq.) have been duplicated and integrated into Title 22. However, because the Department of Toxic Substances Control (DTSC) regulates hazardous waste more stringently than the EPA, the integration of state and federal hazardous waste regulations that make up Title 22 does not contain as many exemptions or exclusions as does 40 CFR 260. As with the HSC, Title 22 also regulates a wider range of waste types and waste management activities than does RCRA. To aid the regulated community, California has compiled hazardous materials, waste, and toxics-related regulations from CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24 and 27 into one consolidated listing: CCR Title 26 (Toxics). However, the hazardous waste regulations are still commonly referred to collectively as "Title 22."

### d. State Aeronautics Act

The State Aeronautics Commission Act of 1947 created the Division of Aeronautics ("Division") and was later amended by statute to read the State Aeronautics Act (Aeronautics Act) in 1961. As a result of this legislation, the Division's first priorities are those mandated by the Aeronautics Act, then Caltrans guidance, then Division guidance as expressed through its Policy Element. As directed by the Aeronautics Act, the Division is a steward and advocate of aviation in California. To that end, its efforts are focused on activities that "protect the public interest in aeronautics and aeronautical progress." (§ 21002)

The Aeronautics Act itself is divided into six chapters, the first five of which have not received significant cleanup legislation since its enabling in 1947. The first chapter begins with general provisions and definitions and explains the Legislature's intent for a State aviation program. Chapter two explains Caltrans' role in administering the Division and explains the role of the California Transportation Commission (CTC). Chapter three includes many of the safety considerations from Federal Aviation Administration (FAA) regulations that help keep airports and the surrounding communities safe and compatible with flight operations. Chapter four deals with airport and heliport permitting, air navigation facilities, noise guidelines, funding, and importantly, the formation and authority of Airport Land Use Commissions (ALUC). Chapter five covers the investigations and hearings on matters covered in the Aeronautics Act. Finally, Chapter six introduces

airport planning and specifically introduces the intent of the CASP and how it can be used to support California aviation.

**e. California Environmental Quality Act**

The operation of airports and aircraft is the responsibility of the Federal Aviation Administration (FAA), but the requirement to document potential hazards related to airports and air activities when a new project is proposed is contained in CEQA, specifically PRC Section 21096, which states:

> *"(a) If a lead agency prepares an environmental impact report for a project situated within airport land use compatibility plan boundaries, or, if an airport land use compatibility plan has not been adopted, for a project within two nautical miles of a public airport or public use airport, the Airport Land Use Planning Handbook published by the Division of Aeronautics of the Department of Transportation, in compliance with section 21674.5 of the Public Utilities Code and other documents, shall be utilized as technical resources to assist in the preparation of the environmental impact report as the report relates to airport-related safety hazards and noise problems.*
>
> *(b) A lead agency shall not adopt a negative declaration for a project described in subdivision (a) unless the lead agency considers whether the project will result in a safety hazard or noise problem for persons using the airport or for persons residing or working in the project area."*

### 4.9.3 Basis for Determining Significance

Section IX of Appendix G to the CEQA Guidelines addresses typical adverse effects due to hazards and hazardous materials, and includes the following threshold questions to evaluate the Project's impacts from hazards and hazardous materials:

- *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;*
- *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;*
- *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*
- *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;*
- *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;*

- *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;*
- *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

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

a. *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;*

b. *Create a significant hazard to the public, or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;*

c. *Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan;*

d. *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*

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

f. *Result in an inconsistency with an Airport Master Plan;*

g. *Require review by the Airport Land Use Commission;*

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

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

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts due to hazards and hazardous materials. It should be noted that the issue of loss, injury, or death involving wildland fires is addressed separately in EIR Subsection 4.21, *Wildfire*.

### 4.9.4 Impact Analysis

| | |
|---|---|
| **Threshold a:** | **Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?** |
| **Threshold b:** | **Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?** |

Implementation of the Project would result in the construction and long-term operation of a residential and commercial retail development. The analysis below evaluates the potential for the Project to result in a substantial hazard to people or the environment due to existing site conditions, construction activities, and long-term operation.

**Impact Analysis for Existing Site Conditions**

As indicated above under subsection 4.9.1.B, the Phase I ESA prepared by Tetra Tech (*Technical Appendix H1*) included a review of historical records, regulatory databases, and site reconnaissance. Based on that review, no recognized environmental conditions (RECs) or vapor encroachment conditions (VECs) were identified on the Project site or surrounding properties. (Tetra Tech, 2020, p. ES-10)

In response to public concerns regarding the past application of Class A biosolids (treated sewage sludge) on the site, a Limited Phase II ESA was conducted in 2024 (*Technical Appendix H2*). The investigation included field sampling and laboratory analysis of shallow soils across previously cultivated areas. Results showed that all tested constituents, including metals, hydrocarbons, and pesticides were either non-detect or below applicable residential screening levels. Although elevated arsenic was initially detected in one composite sample (Area 2), follow-up discrete sampling confirmed concentrations were within natural background ranges. Area 2 also is proposed for permanent conservation and would not be developed. (Tetra Tech, 2024, p. 4)

Based on the findings of both assessments, there are no conditions associated with the Project site's existing state or surroundings that would create a significant hazard to the public or the environment through the routine transport, use, disposal, or accidental release of hazardous materials. Accordingly, no impact would occur related to the Project site's existing environmental conditions.

**Impact Analysis for Temporary Construction-Related Activities**

Heavy equipment (e.g., dozers, excavators, tractors) would be operated on the Project site during construction of the Project. This heavy equipment likely would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be used on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills

associated with the Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the Environmental Protection Agency (EPA) and DTSC, as well as the Santa Ana Regional Water Quality Control Board (RWQCB) pertaining to water quality as discussed in EIR Subsection 4.10, *Hydrology and Water Quality*. With mandatory compliance with applicable hazardous materials regulations, the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. A less-than-significant impact would occur.

**Impact Analysis for Long-Term Operation**

The Project would entail the future development of 694 residential dwelling units on approximately 87.37 acres, the establishment of approximately 12.37 acres of public and recreational open space, the construction of three water quality/detention basins on approximately 16.00 acres, and the preservation of approximately 61.42 acres of conserved open space for habitat protection. None of the proposed uses (residential, recreational, and open space/drainage facilities) are associated with the transport, use, or disposal of significant quantities of hazardous materials. Household and other goods used by residential homes that contain toxic substances are usually low in concentration and small in amount; therefore, there is no significant risk to humans or the environment from the use of such household goods. Residents are required to dispose of household hazardous waste, including pesticides, batteries, old paint, solvents, used oil, antifreeze, and other chemicals, at a Household Hazardous Waste Collection Facility. Also, as of February 2006, fluorescent lamps, batteries, and mercury thermostats can no longer be disposed in the trash. Furthermore, the transport, use, and disposal of hazardous materials are fully regulated by the EPA, State, and/or the County of Riverside. With mandatory regulatory compliance, potential hazardous materials impacts associated with the residential, commercial, and recreational uses associated with long-term operation of the Project would be less than significant.

**Threshold c: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?**

The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. In April 2023, the Riverside County Emergency Management Department (EMD) published a Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP). The purpose of the LHMP is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and human-caused hazards. The LHMP describes the County's plans for a variety of potential hazards, ranging from wildfires to tornados. However, the LHMP does not identify any emergency management facilities on the Project site, does not identify any specific evacuation routes within the Project area, and does not identify any policies or requirements specific to the Project site or surrounding areas. Rather, the LHMP provides a series of policies to be enacted by the various agencies and jurisdictions within the County in the event of emergency situations. As noted by the LHMP, "[t]here has been no development within Riverside County unincorporated areas that have increased hazard risk or vulnerability since the previous

plan was adopted in 2018" (Riverside EMD, 2023, p. 49) Therefore, it can be concluded that developments within Riverside County that adhere to the applicable provisions of County ordinances, including design measures related to emergency access, would not result in a conflict with the LHMP. The proposed Project would be required to comply with all applicable provisions of County policies and ordinances related to public safety, including but not limited to Ordinance No. 457, which establishes the County's building and fire protection regulations and includes measures requiring the provision of adequate emergency access and other measures to address fire hazard safety. During construction and long-term operation of the Project, adequate emergency access for emergency vehicles would be required to be maintained along public streets that abut the Project site. Furthermore, improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area. As part of the County's discretionary review process, Riverside County reviewed the Project's application materials to ensure that appropriate emergency ingress and egress would be available to and from each portion of the Project site and that circulation on each portion of the Project site was adequate for emergency vehicles. There are no components of the proposed Project with the potential to conflict with the County's LHMP. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

**Threshold d: Would the Project emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

There are no existing or planned schools within one-quarter mile of the Project site. The nearest school to the Project site is the Harvest Hill STEAM Academy, located approximately 0.5 mile southwest of the Project site. As described above under the analysis for Thresholds a. and b., the use of and transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations that would preclude substantial public safety hazards. Accordingly, there would be no potential for existing or proposed schools located within one-quarter mile of the Project site to be exposed to substantial safety hazards associated with emission, handling, or the routine transport of hazardous substances or materials to-and-from the Project site, and no impact would occur.

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

The Phase I Environmental Site Assessment (ESA) prepared for the Project site (*Technical Appendix H1*) included a review of federal, State, and local regulatory databases, including those referenced under Government Code Section 65962.5 (commonly known as the "Cortese List"). This review determined that the Project site is not included on any hazardous materials site list compiled pursuant to that statute. As such, the Project would not create a significant hazard to the public or the environment due to the Project site's inclusion on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and no impact would occur. (Tetra Tech, 2020, pp. ES-2-ES-8)

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| **Threshold f:** | **Would the Project result in an inconsistency with an Airport Master Plan?** |
| **Threshold g:** | **Would the Project require review by the Airport Land Use Commission?** |
| **Threshold h:** | **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?** |

The Project site is not located within the boundaries of any Airport Master Plans, and no impact due to an inconsistency with an Airport Master Plan would occur. As previously indicated, the closest public airport is the French Valley Airport located roughly 3.3 miles southwest of the Project site. According to Map CO-1 of the Riverside County Airport Land Use Compatibility Plan Policy Document, the Project site is located outside of the compatibility zones for the French Valley Airport, indicating that the Project site is not subject to airport-related hazards associated with this facility (RCALUC, 2012). The Project site is not located within the Airport Influence Area (AIA) for any other airports. As such, the Project would not require review by the Airport Land Use Commission (ALUC). Additionally, due to the distance between the Project site and the French Valley Airport, the Project would not result in a safety hazard for people residing or working in the Project area. Accordingly, impacts due to public airport-related hazards would be less than significant.

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

The nearest private airstrip, Pines Airpark, is located approximately 0.9-mile northwest of the Project site. However, the Conditional Use Permit (CUP) for the Pines Airpark (CUP 3078 Revision No. 3) was withdrawn on November 15, 2016, and the previously-approved CUP was allowed to expire (Riverside County, 2016). As a result, the Pines Airpark is not an actively-used airport. The nearest active private airport is the Skylark Field Airport, located 11.7 miles west of the Project site; however, the Project site is not located within the AIA for this facility, and the Project would not be subject to substantial safety hazards due to aircraft operations at the Skylark Field Airport. Thus, future residents and workers associated with the Project would not be exposed to safety hazards associated with the Skylark Field Airport or any other private airport facilities. No impact would occur.

### 4.9.5 Cumulative Impact Analysis

Because the issue of hazards and hazardous materials tend to be site-specific in nature, the cumulative study area includes existing and planned developments within a one-mile radius of the Project site. A one-mile radius is appropriate because that is the standard distance used in regulatory database searches of properties that may generate or store toxic materials.

As discussed under Thresholds a and b, the Project site does not contain any recognized environmental conditions (RECs) that could create a significant hazard to the public or the environment. This conclusion is supported by the findings of both the 2020 Phase I Environmental Site Assessment and the 2024 Limited Phase II ESA, which confirmed that no residual soil contamination or elevated health risks are present. There are no site conditions or operational characteristics associated with the Project that would result in a

significant hazard through the routine transport, use, or disposal of hazardous materials, nor are there reasonably foreseeable upset or accident conditions that would cause a release of hazardous substances. Accordingly, the Project's contribution to cumulative impacts associated with hazardous materials would be less than significant.

The Project site does not contain any emergency facilities nor would the Project impact an emergency evacuation route. Other cumulative developments would be reviewed by the County of Riverside to ensure no interference with emergency access and evacuation routes would occur. Accordingly, the Project has no potential to result in cumulatively-considerable impacts associated with emergency evacuation plans or evacuation routes, and impacts would be less than significant.

The Project site is located approximately 0.5-mile from the nearest school. Additionally, as discussed under Thresholds a. and b., the use of and transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations that would preclude substantial public safety hazards. As such, cumulatively-considerable hazardous materials impacts to nearby schools would be less than significant.

As discussed under the analysis of Threshold e., the Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, the Project would not create a significant hazard to the public or the environment. Cumulatively-considerable impacts would not occur.

The Project site is located outside of the compatibility zones for the French Valley Airport, indicating that the Project site is not subject to airport-related hazards and has no potential to conflict with an Airport Master Plan. Accordingly, cumulatively-considerable impacts due to an inconsistency with an Airport Master Plan would not occur. Additionally, impacts due to a conflict with an ALUCP would be less-than-cumulatively considerable.

The Project site is located outside of the AIA for the Skylark Field Airport, which is the nearest active private airport facility; thus, cumulatively-considerable impacts would not occur.

### 4.9.6 Significance of Impacts Before Mitigation

Thresholds a. and b.: Less-than-Significant Impact. Based on the Phase I ESA prepared by Tetra Tech (*Technical Appendix H*), there are no indications of on-site or off-site RECs or VECs on the Project site under existing conditions. In addition, the Project's Limited Phase II ESA (*Technical Appendix H2*) concluded that all detected concentrations of metals, hydrocarbons, and pesticides were either non-detect or below applicable residential screening thresholds. No additional investigation or remediation was recommended. Furthermore, during Project construction and operation, mandatory compliance with federal, State, and local regulations would ensure that the Project as proposed would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials.

Threshold c: Less-than-Significant Impact. The Project would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. No emergency facilities exist on the Project site, and the site does not serve as an emergency evacuation route. Thus, impacts would be less than significant.

Threshold d: No Impact. There are no existing or planned schools within one-quarter mile of the Project site. The nearest school the Project site is the Harvest Hill STEAM Academy, located approximately 0.5-mile southwest of the Project site. With mandatory regulatory compliance, the Project would not emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and no impact would occur.

Threshold e: No Impact. The analysis conducted by Tetra Tech included a review of regulatory databases, and determined that the Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Tetra Tech, 2020, p. ES-2-ES-8). As such, the Project would not create a significant hazard to the public or the environment due to the Project site's inclusion on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and no impact would occur.

Thresholds f., g., and h.: Less-than-Significant Impact. The Project site is not located within two miles of a public airport or within an airport land use plan, and there are no components of the proposed Project that would affect airport operations. The closest airport is the French Valley Airport located roughly 3.3 miles southwest of the Project site. The Project site is located outside of the compatibility zones for the French Valley Airport, indicating that the Project site is not subject to airport-related hazards. Therefore, the Project would not result in an inconsistency with an Airport Master Plan, would not require review by the Airport Land Use Commission, and would not result in a safety hazard for people residing or working in the Project area. Impacts would be less than significant.

Threshold i: No Impact. There are no active private airstrips in the Project vicinity. The nearest active private airport is the Skylark Field Airport, located 11.7 miles west of the Project site. The Project site is not located within the AIA for this facility, and the Project would not be subject to substantial safety hazards due to aircraft operations at the Skylark Field Airport. As such, the Project would not result in a safety hazard for people residing or working in the Project area, and no impact would occur.

### 4.9.7 Regulations, Design Requirements, and Mitigation

***Regulations and Design Requirements***

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

- All future contracts with construction contractors shall comply with all applicable regulations and requirements promulgated by the federal Occupational Safety and Health Administration (OSHA).

- The Project shall comply with Title 22, Division 4.5 of the California Code of Regulations, which requires residents and employees to dispose of household hazardous waste, including pesticides, batteries, old paint, solvents, used oil, antifreeze, and other chemicals, at a Household Hazardous Waste Collection Facility.

- The Project shall comply with Title 22, Division 4.5, Chapter 11 of the California Code of Regulations which requires fluorescent lamps, batteries, and mercury thermostats be recycled or taken to a Household Hazardous Waste Collection Facility.

***Mitigation***

The Project would result in less than significant impacts due to hazards and hazardous materials; therefore, mitigation measures are not required.

## References


| Cited As | Reference |
|---|---|
| RCALUC, 2012 | Riverside County Airport Land Use Commission, 2012. *County of Riverside Airport Land Use Compatibility Plan Policy Document, French Valley Airport*. October 2004. Accessed: June 19, 2025. Available on-line: https://rcaluc.org/sites/g/files/aldnop421/files/migrated/Portals-13-15-20--20Vol.-201-20French-20Valley-20Amd-202011.pdf |
| Riverside County, 2016 | Riverside County, 2016. *Statement of Proceedings for CUP 3078 Revision 3*. November 15, 2016. Accessed May 2, 2025. Available on-line at: https://media.rivcocob.org/proceeds/2016/p2016_11_15.htm |
| Riverside EMD, 2023 | Riverside County Emergency Management Department (EMD), 2023. *County of Riverside Operational Area, Multi-jurisdictional Local Hazard Mitigation Plan*. April 2023. Accessed August 27, 2024. Available on-line: https://rivcoready.org/sites/g/files/aldnop181/files/2023-08/MJLHMP%208.7.23.pdf |
| Tetra Tech, 2020 | Tetra Tech, 2020. *Phase I Environmental Site Assessment, Keller Crossing, Winchester, County of Riverside, California 92596*. July 27, 2020. Included as EIR *Technical Appendix H1*. |
| Tetra Tech, 2024 | Tetra Tech, 2024. *Limited Phase II Investigation Keller Crossing Highway 79 and Keller Road Winchester, Riverside County, California 92596*. December 31, 2024. Included as EIR *Technical Appendix H2*. |

# 4.10 HYDROLOGY AND WATER QUALITY

The following analysis is based on a study titled, "Preliminary Drainage Study for Tentative Tract Map No. 38163 (Keller Crossing) at Winchester Road (HWY-79) in the County of Riverside," prepared by RTM Engineering Consultants (herein, "RTM"), dated March 2025, and included as *Technical Appendix I1* to this EIR (RTM, 2025). The analysis in this subsection also is based in part on a document entitled, "Preliminary County Project Specific Water Quality Management Plan" (WQMP), prepared by RTM, dated January 2026, and included as *Technical Appendix I2* to this EIR (RTM, 2026). Refer to Section 7.0, *References*, for a complete list of reference sources.

## 4.10.1 Existing Conditions

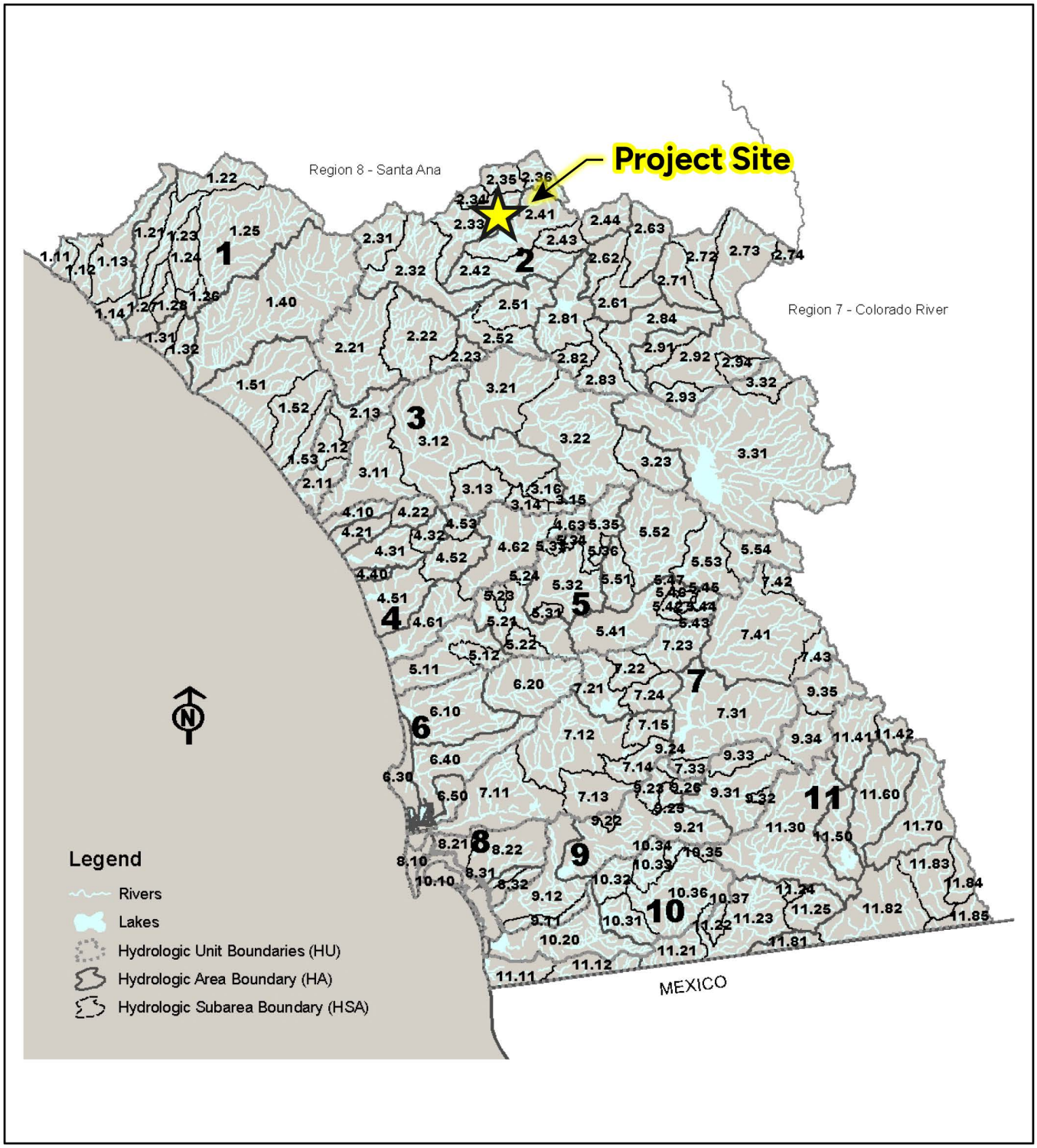
### A. Regional Hydrology

The Project site is located within the French Subarea of the Murrieta Area of the Santa Margarita Hydrologic Unit (HU). The Santa Margarita HU is a rectangular area of about 750 square miles. Included in it are portions of Camp Pendleton as well as the civilian population centers of Murrieta, Temecula, and part of Fallbrook. The unit is drained largely by the Santa Margarita River, Murrieta Creek, and Temecula River. The only coastal lagoon of the unit is the Santa Margarita Lagoon which lies totally within the Camp Pendleton Naval Reservation of the U.S. Marine Corps. The slough at the mouth of the river is normally closed off from the ocean by a sandbar. The major surface water storage areas are Vail Lake and O'Neill Lake. Annual precipitation ranges from less than 12 inches near the coast to more than 45 inches inland near Palomar Mountain. The Project site's location within the Santa Margarita Watershed is shown on Figure 4.10-1, *Santa Margarita Watershed Map*. (RWQCB, 2021, p. 1-8 and Figure 1-2)

### B. Site Hydrology

The Project site consists of generally flat terrain that with a sloped rise in elevation from existing Keller Road to the northern edge boundary. The roughly trapezoidal shaped property has a sloping terrain, with the highest ground elevation of about 1,587 feet toward the northeastern portion of the site to the lowest elevation of about 1,422 feet near the southeastern edge of the site. (Google Earth, 2025)

As shown on, Figure 4.10-2*, Existing Conditions Hydrology Map,* and based on information obtained from Caltrans' Drainage Report for State Route 79 (EA-464121), under existing conditions the Project contains natural water courses that convey runoff from the northerly higher elevation to south and southeast of the Project site, which ultimately flow offsite toward and through several existing Caltrans reinforced concrete pipe (RCP) culvert-under-crossings along Winchester Road (Highway-79). A major drainage course located southwest of the Project site conveys a significant tributary area runoff from the north and west areas of the site and surface-flows southeasterly across Pourroy Road and Keller Road. This water course continues southeasterly, adjacent to existing residential parcels, and crosses Winchester Road (Highway-79) via several existing Caltrans RCP culverts. Presently, there is no existing storm drain infrastructure on-site or




Source(s): California Regional Water Quality Control Board (October 2004)

Figure 4.10-1

Not to Scale

Santa Margarita Watershed Map




Source(s): K&A Engineering (August 2024)

Figure 4.10-2

Not to Scale

Existing Conditions Hydrology Map

within the Pourroy Road and Keller Road right of ways. Table 4.10-1, *Existing Conditions Hydrology Summary,* provides a summary of the acreage and peak flows for each of the drainage areas shown on Figure 4.10-2. (RTM, 2025, p. 3)

**Table 4.10-1 Existing Conditions Hydrology Summary**

| Drainage Area | Area in Acre | Q 100 conf. in cfs | Q 100 MAX. in cfs | Caltrans Culvert Drainage System |
|---|---|---|---|---|
| A | 9.10 | 20.41 | 81.4 | DS #1 |
| B | 21.70 | 41.06 | 41.1 *) | DS #2 |
| C | 286.00 | 548.37 | 237.9 | DS #3 |
| D | 29.40 | 76.93 | 18.0 | DS #4 |
| E | 54.80 | 106.57 | 14.0 | DS #5 |
| F | 13.00 | 31.58 | 18.7 | DS #6 |
| G | 6.20 | 16.32 | 19.5 | DS #7 |
| H | 58.60 | 132.30 | 350.9 | DS #8 |
| I | 1.80 | 5.85 | 30.9 | DS #9 |
| J | 7.80 | 21.11 | 95.5 | DS #10 |
| K | 14.50 | 38.71 | 56.3 *) | DS #11 |

*) Used for wildlife crossing
(RTM, 2025, p. 11)

### C. Flood Hazards

According to mapping information available from the Federal Emergency Management Agency (FEMA), the Project site is located outside of mapped floodplains and is not subject to inundation during peak storm events (FEMA, 2024). Additionally, the Project site is not located within any areas subject to dam inundation hazards (Riverside County, 2021b, Figure 10). The Project also is located entirely outside of flood hazard areas mapped as Riverside County flood zones by Riverside County Flood Control and Water Conservation District (RCFCWCD) (RCIT, n.d.). As such, the Project site is not subject to inundation due to flood hazards under existing conditions.

### D. Water Quality

The Project site is located within the jurisdiction of the San Diego Regional Water Quality Control Board (RWQCB). In accordance with Section 303(d) of the Clean Water Act, the Water Quality Control Plan for the San Diego Basin (herein, "Basin Plan") identifies impairments of major receiving waters. As summarized in Table 4.10-2, *Receiving Water for Storm Water Runoff from the Project Site*, flows from the Project site ultimately discharge to Warm Springs Creek, Murrieta Creek, the Santa Margarita River (Upper), and the Santa Margarita River (Lower). Warm Springs Creek is currently listed as impaired by chlorpyrifos, indicator bacteria, iron, manganese, nitrogen, and phosphorus. Murrieta Creek is impaired by indicator bacteria, iron, manganese, phosphorus, toxicity, and nitrogen. The Santa Margarita River (Upper) is impaired by iron, manganese, nitrogen, phosphorus, and toxicity. The Santa Margarita River (Lower) is impaired by chlorpyrifos, indicator bacteria, nitrogen, phosphorus, and toxicity. These impairments typically are associated with point and non-point source discharges such as urban runoff, agriculture, and other

watershed activities. The beneficial uses of the receiving surface waters of the Project site also are summarized in Table 4.10-2. (RTM, 2026, p. 9)

**Table 4.10-2 Receiving Water for Storm Water Runoff from the Project Site**

| Receiving Waters | USEPA Approved 303(d) List Impairments | Designated Beneficial Uses | Proximity to RARE Beneficial Use |
|---|---|---|---|
| Warm Spring Creek | Chlorpyrifos, Indicator Bacteria, Iron, Manganese, Nitrogen, Phosphorus. | N/A | None |
| Murrieta Creek | Indicator Bacteria, Iron, Manganese, Phosphorus, Toxicity, Nitrogen | MUN, AGR, IND, PROC, GWR, REC1, REC2, WARM, WILD, SPWN | None |
| Santa Margarita River (Upper) | Iron, Manganese, Nitrogen, Phosphorus, Toxicity | MUN, AGR, IND, REC1, REC2, WARM, COLD, WILD, RARE | 18 miles |
| Santa Margarita River (Lower) | Chlorpyrifos, Indicator Bacteria, Nitrogen, Phosphorus, Toxicity | MUN, AGR, IND, REC1, REC2, WARM, COLD, WILD, RARE | 18 miles |

Notes: MUN = Municipal and Domestic Supply; AGR = Agricultural Supply; GWR = Groundwater Recharge; REC1 = Water Contact Recreation; REC2 = Non-contact Water Recreation; WARM = Warm Freshwater Habitat; COLD = Cold Freshwater Habitat; WILD = Wildlife Habitat; IND = Industrial Service Supply; PROC = Industrial Process Supply; RARE = Rare, Threatened or Endangered Species; SPWN = Spawning, Reproduction and Development.
(RTM, 2026, Table A-1)

### E. Groundwater

Under existing conditions, the Project site consists of undeveloped lands; thus, the Project site allows for infiltration of runoff under existing conditions. As indicated in the Project's Geotechnical Update *(Technical Appendix F1),* groundwater was not encountered in any of the exploratory borings or trenches excavated to a maximum depth of 32.1 feet, and the regional groundwater level is estimated to be greater than 50 feet below the existing ground surface of the Project site. (GeoTek, 2021, p. 11)

The Eastern Municipal Water District (EMWD) is responsible for managing two regions for groundwater purposes within its service area, the West San Jacinto Groundwater Sustainability Agency Area and the Hemet-San Jacinto Watermaster Management Area. As depicted on Figure 6-2 of EMWD's 2015 Urban Water Management Plan (UWMP), although the Project site falls under EMWD jurisdiction, the Project area is not located within either of the two groundwater management zones. As such, the Project area is not subject to a groundwater management plan. (EMWD, 2025, Figure 6-2)

## 4.10.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations related to hydrology and water quality.

## A. Federal Regulations

### *1. Clean Water Act*

The 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.

### *2. Federal Flood Insurance Program*

The U.S. Congress established the National Flood Insurance Program (NFIP) with the passage of the National Flood Insurance Act of 1968. The NFIP is a Federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for State and community floodplain management regulations that reduce future flood damages. Participation in the NFIP is based on an agreement between communities and the Federal Government. If a community adopts and enforces a floodplain management ordinance to reduce future flood risk to new construction in floodplains, the Federal Government will make flood insurance available within the community as a financial protection against flood losses. This insurance is designed to provide an insurance alternative to disaster assistance to reduce the escalating costs of repairing damage to buildings and their contents caused by floods. The Federal Insurance and Mitigation Administration (FIMA) within the Federal Emergency Management Agency (FEMA) is responsible for administering the NFIP and administering programs that provide assistance for mitigating future damages from natural hazards.

### *3. Executive Order 11988 – Floodplain Management*

Executive Order 11988 requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. In accomplishing this objective, "each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by flood plains in carrying out its responsibilities" for the following actions:

- acquiring, managing, and disposing of federal lands and facilities;
- providing federally-undertaken, financed, or assisted construction and improvements; and

- conducting federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities.

*4. Federal Antidegradation Policy*

The Federal Antidegradation Policy (40 CFR 131.12) requires states to develop and implement statewide antidegradation policies. Pursuant to the Code of Federal Regulations, state antidegradation policies and implementation methods must, at a minimum, (1) protect and maintain existing in-stream water uses; (2) protect and maintain existing water quality, where the quality of the waters exceeds levels necessary to support existing beneficial uses (unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area); and (3) protect and maintain water quality in waters considered an outstanding national resource.

**B. State Regulations**

*1. Porter-Cologne Water Control Act*

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 et seq.), the policy of the State is as follows:

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of the nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) can make their own investigations or may require dischargers to carry out water quality investigations and

report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions.

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. The Project site is located in the Santa Margarita Watershed which is within the purview of San Diego Region RWQCB. The San Diego RWQCB and the San Diego Basin (9) Water Quality Control Plan is the governing water quality plan for the region.

*2. Other California Code Requirements*

Water quality provisions are contained in numerous other California Code sections, including: 1) the Health and Safety Code for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies.

*3. California Water Code*

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies. The California Department of Fish and Wildlife (CDFW), through provisions of the Fish & Game Code (§§ 1601 - 1603) is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW.

Surface water quality is the responsibility of the Regional Water Quality Control Board (RWQCB), water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water.

*4. California Toxics Rule (CTR)*

The California Toxics Rule (CTR) fills gap in California's water quality standards necessary to protect human health and aquatic life beneficial uses. The CTR criteria are similar to those published in the National Recommended Water Quality Criteria. The CTR supplements, and does not change or supersede, the criteria that EPA promulgated for California waters in the National Toxics Rule (NTR). The human health NTR and CTR criteria that apply to drinking water sources (those water bodies designated in the Basin Plans as municipal and domestic supply) consider chemical exposure through consumption of both water and aquatic organisms (fish and shellfish) harvested from the water. For waters that are not drinking water sources (e.g., enclosed bays and estuaries), human health NTR and CTR criteria only consider the consumption of contaminated aquatic organisms. The CTR and NTR criteria, along with the beneficial use designations in the Basin Plans and the related implementation policies, are the directly applicable water quality standards for toxic priority pollutants in California waters.

*5. CDFG Code Section 1600 et seq. (Lake- or Streambed Alteration Agreement Program)*

Fish and Game Code § 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
- Deposit debris, waste or other materials that could pass into any river, stream, or lake.

It should be noted that "any river, stream or lake" includes those that are episodic (they are dry for periods of time) as well as those that are perennial (they flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when it determines that the activity, as described in a complete LSA Notification, may substantially adversely affect existing fish or wildlife resources. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify a project that would eliminate or reduce harmful impacts to fish and wildlife resources. Before issuing an LSA Agreement, CDFW must comply with CEQA.

*6. Watershed Management Initiative (WMI)*

The State and Regional Water Boards are currently focused on looking at entire watersheds when addressing water pollution. The Water Boards adopted the Watershed Management Initiative (WMI) to further their goals. The WMI establishes a broad framework overlying the numerous federal and State mandated priorities. As such, the WMI helps the Water Boards achieve water resource protection, enhancement and

restoration while balancing economic and environmental impacts. The integrated approach of the WMI involves three main ideas:

- Use water quality to identify and prioritize water resource problems within individual watersheds. Involve stakeholders to develop solutions.
- Better coordinate point source and nonpoint source regulatory efforts. Establish working relationships between staff from different programs.
- Better coordinate local, state, and federal activities and programs, especially those relating to regulations and funding, to assist local watershed groups.

*7. Sustainable Groundwater Management Act (SGMA)*

The 2014 Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. The DWR categorizes the priority of groundwater basins. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The SGMA also requires local public agencies and Groundwater Sustainability Agencies (GSAs) in high- and medium-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long term sustainability.

*8. National Pollutant Discharge Elimination System Construction General Permit*

Pursuant to Section 402(p) of the CWA, which requires regulations for permitting certain storm water discharges, the SWRCB has issued a statewide general NPDES Permit for storm water discharges from construction sites . The SWRCB adopted the 2022 Construction Stormwater General Permit, Order 2022-0057-DWQ, on September 8, 2022, and it went into effect on September 1, 2023. Under this Construction General Permit, storm water discharges from construction sites with a disturbed area of one acre or more are required to either obtain individual NPDES permits for storm water discharges or to be covered by the Construction General Permit. Coverage under the Construction General Permit is accomplished by determining the risk level of the construction site and by preparing a SWPPP that includes a site evaluation and assessment, BMPs to be implemented at the construction site, and an inspection program. The SWPPP should also outline the monitoring and sampling program to verify compliance with discharge Numeric Action Levels (NALs) according to the Risk Level for the site, as set by the Construction General Permit. The primary objective of the SWPPP is to ensure that the responsible party properly constructs, implements, and maintains BMPs to reduce or eliminate pollutants in storm water discharges and authorized non-storm water discharges from the construction site. Permit Registration Documents (SWPPP, Notice of Intent, and other documents), as well as annual reports, Notice of Terminations, and NAL exceedance reports, must be electronically submitted to the SWRCB and the permit fee mailed to the SWRCB for Construction General Permit coverage.

### C. Local

*1. Water Quality Control Plan for the San Diego Basin (Basin Plan)*

The California Porter-Cologne Water Quality Control Act (§ 13000 ("Water Quality") et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the San Diego RWQCB. Water quality information for the Santa Margarita River watershed is contained in the "Water Quality Control Plan for the San Diego Basin" (Basin Plan), which was most recently updated September 1, 2021. This document is herein incorporated by reference and is available for public review at the San Diego RWQCB office located at 2375 Northside Drive, Suite 100, San Diego, CA 92108. The purpose of the Basin Plan is to: (1) designate beneficial uses of the Region's surface and ground waters; (2) designate water quality objectives for the reasonable protection of those uses; and (3) establish an implementation plan to achieve the objectives. A summary of the receiving waters for the Project site, their existing Section 303(d) impairments, and designated beneficial uses previously was shown in Table 4.10-2. (RWQCB, 2021)

*2. Riverside County Ordinance No. 754 – Stormwater / Urban Runoff Management and Discharge Controls*

The ordinance requires that all discharge to storm drain systems be confined to stormwater runoff discharged pursuant to a NPDES permit or as otherwise authorized by the Santa Ana, San Diego, or Colorado River Basin RWQCB or the SWRCB in compliance with the federal Clean Water Act. This ordinance also establishes a variety of standards and BMPs associated with controlling stormwater runoff.

## 4.10.3 Basis for Determining Significance

Section X of Appendix G to the CEQA Guidelines addresses typical adverse effects to hydrology and water quality, and includes the following threshold questions to evaluate the Project's impacts on hydrology and water quality:

a. *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;*

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

c. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

    i. *Result in substantial erosion or siltation on- or off-site;*

    ii. *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*

    iii. *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*

iv. *Impede or redirect flood flows*.

d. *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation*.

e. *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan*.

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

a. *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;*

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

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

d. *Result in substantial erosion or siltation on-site or off-site;*

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

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

g. *Impede or redirect flood flows;*

h. *In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation; or*

i. *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan*.

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

### 4.10.4 Impact Analysis

| | |
|---|---|
| **Threshold a.:** | **Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?** |
| **Threshold b.:** | **Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?** |
| **Threshold i.:** | **Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?** |

Potable water service to the Project site would be provided by the Eastern Municipal Water District (EMWD), and the Project would not involve direct groundwater extraction via existing or proposed groundwater wells. Additionally, post-development runoff from the Project site would be conveyed to downstream drainage systems, where infiltration may continue to occur (e.g., Warm Springs Creek, Murrieta Creek, and the Santa Margarita River). Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that it would impede sustainable groundwater management of the basin. Impacts would be less than significant.

The Project site lies within the jurisdiction of the San Diego Regional Water Quality Control Board (RWQCB). Water quality information for the Santa Margarita River watershed is addressed in the Water Quality Control Plan for the San Diego Basin (Basin Plan), which, although adopted in 1994, is subject to periodic updates, and most recently was amended in September 2021. The Project also lies within EMWD's service area, which overlays the San Jacinto Groundwater Basin. Although the San Jacinto Basin is managed under both the Hemet/San Jacinto and West San Jacinto Groundwater Management Plans, the WSA confirms that the Project site is located *outside* of the EMWD's designated groundwater management zones (GMZs) under these plans. As such, the Project area is not directly subject to a sustainable groundwater management plan under the Sustainable Groundwater Management Act (SGMA). Accordingly, the analysis below focuses on the Project's consistency with the San Diego Basin Plan and confirms that the Project would not result in direct extraction or substantial interference with groundwater resources. (RWQCB, 2021)

**Water Quality Control Plan for the San Diego Basin (Basin Plan)**

The California Porter-Cologne Water Quality Control Act (§ 13000 ("Water Quality") et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the Santa Margarita watershed, which is under the jurisdiction of the San Diego RWQCB. Water quality information for the Santa Margarita watershed is contained in the San Diego RWQCB's Basin Plan, as most recently updated September 1, 2021. This document is herein incorporated by reference and is available for public review at the San Diego RWQCB office located at 2375 Northside Drive, Suite 100, San Diego, CA 92108. (RWQCB, 2021)

The CWA requires all states to conduct water quality assessments of their water resources to identify water bodies that do not meet water quality standards. Water bodies that do not meet water quality standards are

placed on a list of impaired waters pursuant to the requirements of Section 303(d) of the CWA. The Project site resides within the Santa Margarita River Watershed and receiving waters for the property's drainage are the Warm Springs Creek, Murrieta Creek, Santa Margarita River (Upper), and Santa Margarita River (Lower). All of the Project's receiving waters are listed on the Section 303(d) list. Warm Springs Creek is impaired by chlorpyrifos, indicator bacteria, iron, manganese, nitrogen, and phosphorus. Murrieta Creek is currently impaired by indicator bacteria, iron, manganese, phosphorus, toxicity, and nitrogen. The Santa Margarita River (Upper) is currently impaired by iron, manganese, phosphorus, toxicity, and nitrogen, while the Santa Margarita River (Lower) is impaired by chlorpyrifos, indicator bacteria, nitrogen, phosphorus, and toxicity. (RTM, 2026, p. 9)

Specific provision of the CWA applicable to the proposed Project is CWA Section 402, which authorizes the National Pollutant Discharge Elimination System (NPDES) permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites one acre or larger to prepare a Stormwater Pollution Prevention Plan (SWPPP) and obtain authorization to discharge stormwater under an NPDES construction stormwater permit.

Provided below is a discussion of the Project's potential to conflict with the San Diego Region Basin Plan both during construction and long-term operation.

***Construction-Related Water Quality***

Construction of the proposed Project would involve demolition, clearing, grading, paving, utility installation, building construction, and landscaping activities, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

Pursuant to the requirements of the San Diego RWQCB and the County of Riverside, the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. In addition, the Project would be required to comply with the RWQCB's Basin Plan. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the Best Management Practices (BMPs) that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that the proposed Project does not violate any water quality standards or waste discharge requirements during construction activities. Therefore, with mandatory adherence to the future required SWPPP, runoff associated with Project-related construction activities would not conflict with the San Diego Basin Plan requirements, and impacts would be less than significant.

***Operational Water Quality Impacts***

As noted above and as shown in Table 4.10-2, receiving waters for the property's drainage are the Warm Springs Creek, Murrieta Creek, Santa Margarita River (Upper), and Santa Margarita River (Lower). Warm Springs Creek is impaired by chlorpyrifos, indicator bacteria, iron, manganese, nitrogen, and phosphorus. Murrieta Creek is currently impaired by indicator bacteria, iron, manganese, phosphorus, toxicity, and nitrogen. The Santa Margarita River (Upper) is currently impaired by iron, manganese, phosphorus, toxicity, and nitrogen, while the Santa Margarita River (Lower) is impaired by chlorpyrifos, indicator bacteria, nitrogen, phosphorus, and toxicity. In order to assess the Project's potential for water quality impacts, Project-specific Hydrology and Water Quality Technical Appendices were prepared for the Project and are included as *Technical Appendices I1 and I2*, respectively.

To comply with the NPDES Municipal Separate Storm Sewer System (MS4) Permit for the Santa Margarita Region, the Project includes a storm drain system designed to capture and treat the first flush (Design Capture Volume) of stormwater runoff through biofiltration Best Management Practices (BMPs) installed on site. First flush refers to the initial runoff from a storm event, which typically contains the highest concentrations of urban pollutants due to accumulation on impervious surfaces during dry periods. As described in the Project's Preliminary Water Quality Management Plan (included as EIR *Technical Appendix I2*), on-site biofiltration basins would treat runoff prior to discharge into downstream infrastructure and ultimately into the Santa Margarita River watershed, via Warm Springs Creek and Murrieta Creek. These receiving waters are listed as impaired on the State's 303(d) List for pollutants such as chlorpyrifos, nutrients (phosphorus, nitrogen), total dissolved solids (TDS), and toxicity. Because all operational runoff generated on site would be captured and treated in accordance with the Santa Margarita MS4 Permit and County Ordinance No. 754, the Project would not violate water quality standards or conflict with the objectives of the San Diego Basin Plan. Operational water quality impacts would be less than significant.

***Groundwater Quality and Supplies***

As previously stated, the EMWD is responsible for managing two regions for groundwater purposes, the West San Jacinto Groundwater Sustainability Agency Area and the Hemet-San Jacinto Watermaster Management Area. As depicted on Figure 6-2 of the 2025 UWMP, although the Project site falls under EMWD jurisdiction, the Project area is not located within either of the two EMWD groundwater management zones (EMWD, 2025, Figure 6-2). As such, the Project is not subject to a groundwater management plan, and the Project has no potential to conflict with the West San Jacinto Groundwater Basin Management Plan or the policies and requirements applicable within the Hemet-San Jacinto Watermaster Management Area.

Although the Project site is not located within any EMWD groundwater management areas, the proposed Project would not adversely affect groundwater supplies or quality. There are no existing groundwater wells on the Project site, and the proposed Project does not propose to construct any wells on site. As such, the Project would not directly extract groundwater, but would instead obtain potable water from the EMWD, which relies in part on groundwater resources.

As noted above under the discussion of the Project's consistency with the San Diego Basin Plan, the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The

NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that construction of the proposed Project does result in polluted runoff that could adversely affect groundwater quality. Accordingly, during construction of the Project a less-than-significant impact would occur.

Following construction activities, infiltration on the Project site would be reduced and would be limited to landscaped and open space areas, as remaining areas of the site would be covered with impervious surfaces (i.e., buildings, streets, parking lots, etc.). While a nominal amount of groundwater recharge may occur on site under existing conditions, the majority of runoff is conveyed to downstream facilities, which ultimately include unlined drainage channels and bodies of water (i.e., the Santa Margarita River) wherein groundwater recharge occurs. These conditions would not substantially change under the proposed Project. Groundwater recharge would continue to occur downstream, as it does under existing conditions. As such, Project impacts due to groundwater recharge would be less than significant.

With respect to groundwater quality under long-term operations, the Project Applicant would be required to identify measures to reduce pollutants in runoff from the Project site pursuant to the applicable NPDES permit requirements, including, but not limited to, the Project's proposed biofiltration basins, landscaped areas, and open space areas. Measures identified to address water quality are identified as part of the Project's WQMP (*Technical Appendix I2*). With mandatory compliance with the Project's WQMP, the Project would not contribute substantial amounts of polluted runoff towards groundwater basins tributary to the Project site. As such, the proposed Project would not adversely affect groundwater supplies or groundwater quality, and impacts would therefore be less than significant.

| | |
|---|---|
| **Threshold c.:** | **Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?** |
| **Threshold f.:** | **Would the Project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?** |

Please refer to the analysis of Thresholds a, b, and i. As indicated therein, with implementation of the Project's proposed drainage system and water quality improvements, the Project would not generate substantial additional sources of polluted runoff. Accordingly, Project impacts to water quality would be less than significant.

As depicted on Figure 4.10-3, *Proposed Conditions Hydrology Map*, grading proposed as part of the Project would not substantially alter the existing topography of the Project site. Runoff tributary to and/or generated

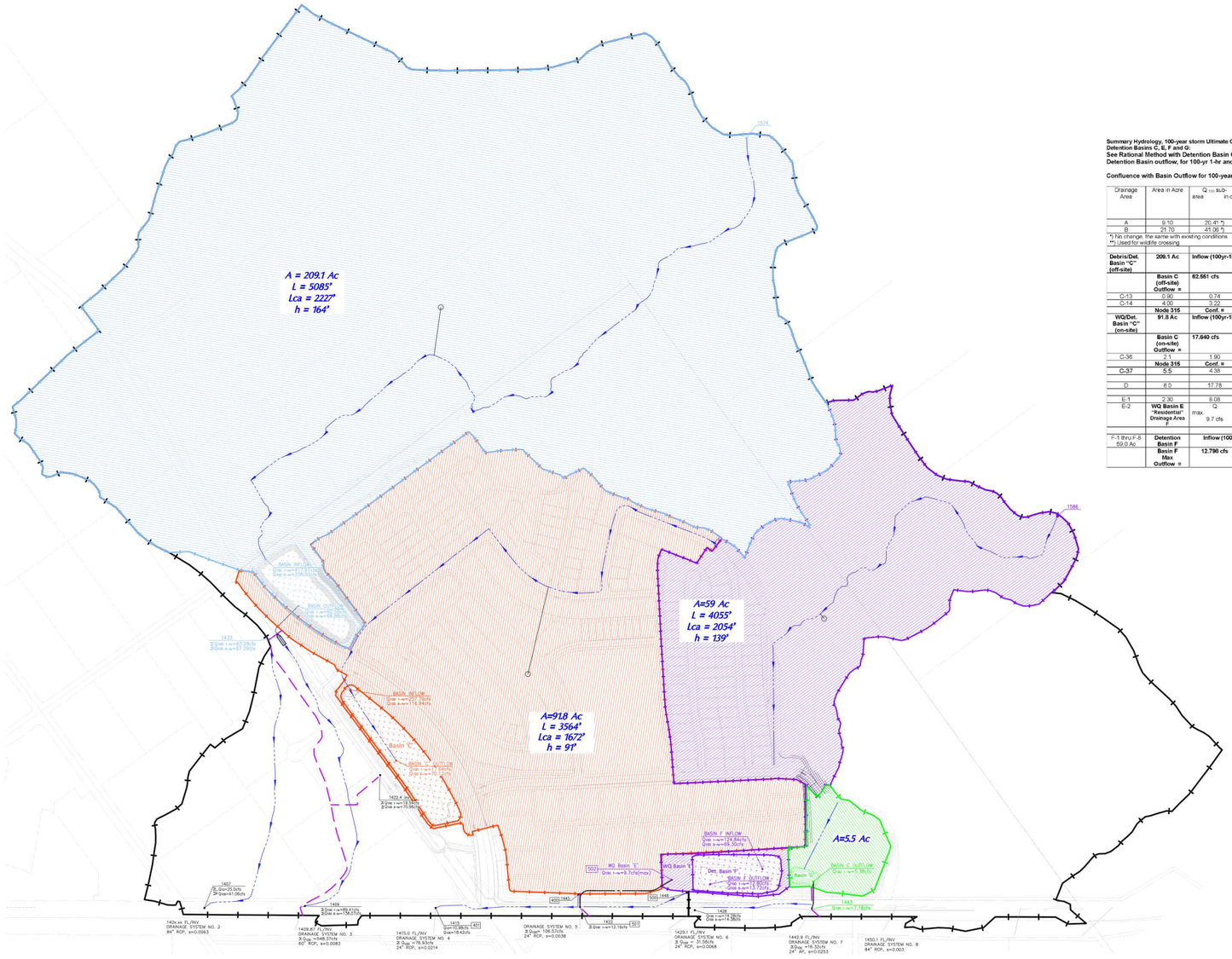
within the developed portions of the Project site would be collected via a series of on-site catch basins and storm drain lines ranging in size up from 12 to 42 inches, which would convey flows into proposed on-site water quality and detention basins. As shown, runoff that is currently tributary to the Project site from the west and northwest would be conveyed to a proposed debris basin (lot 638) proposed in the southwest corner of the Project site. Runoff generated in the southern portions of the Project site that are proposed for development (Drainage Area C) would be conveyed to proposed Extended Detention Basin C2, proposed along the south side of the realigned Keller Road and north of the existing (Old) Keller Road. Runoff generated in the northeastern portions of the Project site proposed for development would be conveyed to a proposed water quality/detention Basins E and F, proposed along the Project site's frontage with Winchester Road. Runoff from the natural hillside in the northeast corner of the Project site either would be conveyed to Basin G for detention and water quality treatment, or would be discharged directly into existing drainage facilities within Winchester Road. Runoff from the water quality/detention basins ultimately would be conveyed to existing Caltrans culverts beneath Winchester Road and ultimately discharged off-site and towards a major natural drainage course southeast of the Project site.

With implementation of the proposed Project, portions of the Project site would be developed with impervious surfaces, with exception of proposed open space, landscaped, and recreational areas. As previously indicated, runoff from the developed portions of the Project site is proposed to be routed to a combination of water quality and detention basins to mitigate the majority of proposed development water quality volume and to detain on-site runoff volume to ensure that post-development volume does not exceed pre-development volume. As documented in the Project's Hydrology Study (*Technical Appendix I1*), the Project's drainage system has been designed such that the post-development peak runoff volumes would not exceed the pre-development volumes. As such, implementation of the proposed Project would not result in an increase in peak runoff from the Project site and therefore would not result in the alteration of any downstream receiving waters. Additionally, because existing drainage facilities downstream are adequately sized to accommodate peak runoff from the Project site and surrounding areas under existing conditions, and because peak runoff from the Project site would be reduced with development of the Project site as proposed, the Project would not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant. (RTM, 2025, p. 6)

**Threshold d.: Would the Project result in substantial erosion or siltation on-site or off-site?**

### A. Construction-Related Erosion Impacts

As shown on EIR Figures 3-7 and 3-11, the Project has been designed to generally maintain the existing topography of the site, with minor modifications as necessary to accommodate site development and proposed drainage conditions. Nonetheless, construction of the proposed Project would involve substantial ground disturbance during clearing and grading of the site. In addition, on-site erosion could occur if graded slopes are not stabilized prior to ultimate development and/or landscaping. The proposed grading activities would generate sediment that could be transported off-site during a heavy rainfall event. Should such an event occur in the absence of appropriate preventative measures, erosion and/or siltation downstream could result.



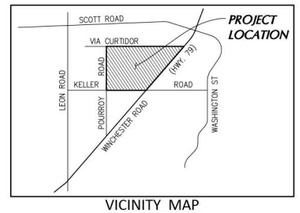

**Summary Hydrology, 100-year storm Ultimate Condition – Rational Method, WITH Detention Basins C, E, F and G:**
**See Rational Method with Detention Basin Outflows (using "User Input" for Detention Basin outflow, for 100-yr 1-hr and 100-yr 6-hr storm frequency).**

**Confluence with Basin Outflow for 100-year 1-hour storm:**

| Drainage Area | Area in Acre | $Q_{100}$ sub-area in cfs | $I_{100}$ conf. in cfs | Existing Caltrans Culvert ($Q_{100yr-1hr}$ = MAX. in cfs) |
|---|---|---|---|---|
| A | 9.10 | 20.41 *) | | 81.4 |
| B | 21.70 | 41.06 *) | | 41.1 **) |
| *) No change, the same with existing conditions<br>**) Used for wildlife crossing | | | | |
| **Debris/Det. Basin "C" (off-site)** | **209.1 Ac** | **Inflow (100yr-1hr) = 417.913 cfs** | | |
| | **Basin C (off-site) Outflow =** | **62.561 cfs** | | |
| C-13 | 0.90 | 0.74 | 63.29 | |
| C-14 | 4.00 | 3.22 | 66.51 | |
| | **Node 315** | **Conf. =** | **66.51** | |
| **WQ/Det. Basin "C" (on-site)** | **91.8 Ac** | **Inflow (100yr-1hr) = 257.785 cfs** | | |
| | **Basin C (on-site) Outflow =** | **17.640 cfs** | | |
| C-36 | 2.1 | 1.90 | 19.54 | |
| | **Node 315** | **Conf. =** | **86.03** | |
| C-37 | 5.5 | 4.38 | **89.41** | (DS #3) 237.9 |
| D | 8.0 | 17.78 | | (DS #4) 18.0 |
| E-1 | 2.30 | 8.08 | | |
| E-2 | **WQ Basin E "Residential" Drainage Area F** | max. Q = 9.7 cfs | **12.16** | (DS #5) 14.0 |
| F-1 thru F-8 59.0 Ac | **Detention Basin F** | **Inflow (100yr-1hr) = 1124.84 cfs** | | |
| | **Basin F Max Outflow =** | **12.796 cfs** | | |

**Confluence with Basin Outflow for 100-year 6-hour storm:**

| Drainage Area | Area in Acre | $Q_{100}$ sub-area in cfs | $I_{100}$ conf. in cfs | Existing Caltrans Culvert ($Q_{100yr-1hr}$ = MAX. in cfs) |
|---|---|---|---|---|
| A | 9.10 | 20.41 *) | | 81.4 |
| B | 21.70 | 41.06 *) | | 41.1 **) |
| *) No change, the same with existing conditions<br>**) Used for wildlife crossing | | | | |
| **Debris/Det. Basin "C" (off-site)** | **209.1 Ac** | **Inflow (100yr-6hr) = 417.913 cfs** | | |
| | **Basin C (off-site) Outflow =** | **66.981 cfs** | | |
| C-13 | 0.90 | 0.31 | 67.29 | |
| C-14 | 4.00 | 1.37 | 68.67 | |
| | **Node 315** | **Conf. =** | **68.67** | |
| **WQ/Det. Basin "C" (on-site)** | **91.8 Ac** | **Inflow (100yr-6hr) = 116.936 cfs** | | |
| | **Basin C (on-site) Outflow =** | **70.119 cfs** | | |
| C-36 | 2.1 | 0.84 | 70.96 | |
| | **Node 315** | **Conf. =** | **136.12** | |
| C-37 | 5.5 | 1.94 | **138.07** | (DS #3) 237.9 |
| D | 8.0 | 17.78 | | (DS #4) 18.0 |
| E-1 | 2.30 | 8.08 | | |
| E-2 | **WQ Basin E "Residential" Drainage Area F** | max. Q = 9.7 cfs | **12.16** | (DS #5) 14.0 |
| F-1 thru F-8 59.0 Ac | **Detention Basin F** | **Inflow (100yr-6hr) = 69.30 cfs** | | |
| | **Basin F Max Outflow =** | **13.715 cfs** | | |
| F-9 | 1.7 | 0.66 | **14.38** | (DS #6) 18.7 |
| G-1 5.5 Ac | **WQ/Detention Basin G** | **Inflow (100yr-1hr) = 20.52 cfs** | | |




VICINITY MAP
NOT TO SCALE

LEGEND

- HYDROLOGY BOUNDARY
- DRAINAGE BOUNDARY
- FLOWLINE

COLOR CODE

- AREA C OFF–SITE
- AREA C ON–SITE
- AREA F
- AREA G

Source(s): RTM Engineering Consultants, 2025

Figure 4.10-3

Not to Scale

Proposed Conditions Hydrology Map

However, pursuant to requirements of the State Water Resources Control Board (SWRCB) and the San Diego Basin Plan, the Project Applicant would be required to obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ). The NPDES permit applies to all projects that include construction activities such as clearing, grading, and/or excavation that disturb one (1) acre or more of total land area.

Compliance with the NPDES permit involves the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) for construction-related activities. The SWPPP would identify and implement erosion control and sediment control Best Management Practices (BMPs) to minimize the potential for on-site and off-site erosion and siltation and would also include measures to stabilize soils, prevent tracking, and protect temporary excavations from caving or collapse. Typical BMPs may include installation of fiber rolls, silt fencing, stabilized construction entrances, erosion control blankets, and outlet protection. With mandatory compliance with the NPDES permit and implementation of the required SWPPP and associated BMPs, potential effects associated with construction-related erosion, siltation, water quality degradation, and flooding of downstream water resources would be reduced to less than significant levels.

**B. Post-Development Erosion Impacts**

Implementation of the proposed Project would result in the conversion of the site from undeveloped land to a residential community. With development of the Project site, large portions of the site would consist of impervious surfaces, with areas of pervious surfaces largely confined to landscaped and open space areas. As such, the potential for long-term erosion hazards on site would be reduced compared to existing conditions, as the site would be fully graded, stabilized, and served by a permanent stormwater drainage system. Accordingly, long-term erosion impacts on site would be less than significant.

Due to the increase in impervious surfaces, runoff from the site following development has the potential to contribute to erosion hazards downstream if not properly managed. However, as discussed under the analysis of Thresholds c. and f., runoff from the developed portions of the Project site is proposed to be routed to a combination of water quality and detention basins to mitigate the majority of proposed development water quality volume and to detain on-site runoff volume to ensure that post-development volume does not exceed pre-development volume. As documented in the Project's Hydrology Study (*Technical Appendix I1*), the Project's drainage system has been designed such that the post-development peak runoff volumes would not exceed the pre-development volumes. As such, the Project would not result in an increase in peak runoff from the site and therefore would not cause or contribute to increased erosion hazards downstream. Impacts would be less than significant.

| | |
|---|---|
| **Threshold e.:** | **Would the Project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?** |
| **Threshold g.:** | **Would the Project impede or redirect flood flows?** |

According to mapping information available from FEMA, the Project site is located outside of mapped floodplains. As such, the Project site is not subject to inundation due to flood hazards. Additionally, there

are no components of the Project that would impede or redirect flood flows. No impact would occur. (FEMA, 2024)

The Project's proposed drainage system has been designed to preclude the potential for flooding hazards on site, in accordance with standard County requirements. As previously indicated under the analysis of Thresholds c. and f., with implementation of the Project's proposed drainage system the peak runoff from the Project site would be attenuated such that peak flows from the Project site post-development would not exceed the peak flows that occur under existing conditions. As such, the Project would not substantially increase the rate of surface runoff in a manner which would result in flooding on-site or off-site, and impacts would be less than significant.

**Threshold h.: In flood hazard, tsunami, or seiche zones, would the Project risk the release of pollutants due to Project inundation?**

The Project site is located approximately 31.0 miles northeast of the Pacific Ocean, and as such there is no potential for the Project site to be inundated with tsunamis. According to Figure 10 of the Southwest Area Plan (SWAP), the Project site is not located within a dam inundation area. As such, it can be concluded that the Project site also would not be subject to seiche hazards associated with nearby bodies of water, including Lake Skinner and Diamond Valley Lake (Riverside County, 2021b, Figure 10). With respect to flood hazards, and as indicated under the analysis of Thresholds e. and g., the Project site is not located within a mapped floodplain, indicating that the Project site is not subject to inundation due to flood hazards. The Project also is located entirely outside of County-mapped flood hazard areas (RCIT, n.d.) Therefore, the Project would not result in the risk of pollutants due to site inundation and no impact would occur.

### 4.10.5 Cumulative Impact Analysis

The cumulative impact analysis considers construction and operation of the proposed Project in conjunction with other development projects in the vicinity of the Project site and resulting from full buildout of the Riverside County General Plan and the general plans of other local jurisdictions that are located within the Santa Margarita River watershed.

As discussed under the analysis of Thresholds a., b., and i., the Project would result in less-than-significant impacts to surface and groundwater quality during construction because the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. Compliance with the NPDES permit and the San Diego Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Other cumulative developments within the cumulative study area also would be required to comply with the NPDES Municipal Stormwater Permit and would be required to implement BMPs during construction activities to preclude water quality impacts that could impair downstream waters or groundwater. As such, construction-related surface and groundwater quality impacts, as well as impacts due to a conflict with the San Diego Basin Plan, would be less-than-cumulatively considerable during construction. With respect to

long-term impacts to water quality, the Project's proposed storm drain system is designed to route first flush runoff to water quality/detention basins. The water quality/detention basins have been designed to detain runoff and provide water quality treatment and would reduce pollutants of concern in runoff leaving the Project site. Other cumulative developments would similarly be required to incorporate BMPs to treat water quality pollutants of concern. Accordingly, the Project's impacts would be less than significant on a cumulatively-considerable basis.

As indicated under the analysis of Thresholds c. and f., although extensive grading would be required to implement the proposed Project, grading proposed as part of the Project generally would maintain the site's existing drainage patterns, with runoff continuing to flow from the northerly higher elevation to the south and southeasterly portions of the Project site. As such, the Project would not substantially alter the existing drainage pattern of the Project site or surrounding areas, and impacts would be less than significant on a cumulatively-considerable basis. Additionally, implementation of the proposed Project would not result in an increase in peak runoff from the Project site as compared to existing conditions, and therefore the Project would not result in the alteration of any downstream receiving waters on either a direct or cumulatively-considerable basis. Additionally, because the Project would not result in an increase in peak runoff from the Project site as compared to existing conditions, the Project would not contribute runoff water that could exceed the capacity of existing or planned stormwater drainage systems, and cumulatively-considerable impacts would not occur.

As discussed under the analysis of Threshold d., during construction the Project would be subject to compliance with the applicable NPDES permit, which requires the preparation and implementation of a SWPPP to address erosion hazards associated with construction activities. Other cumulative developments similarly would be required to prepare and implement a SWPPP. As such, erosion-related hazards during construction activities would be less-than-cumulatively considerable. Additionally, implementation of the proposed Project would result in the conversion of the site from undeveloped land to a residential development. With development of the Project site, large portions of the Project site would consist of impervious surfaces, with areas of pervious surfaces largely confined to landscaped areas. Thus, the potential for erosion hazards on site would be substantially decreased as compared to existing conditions with buildout of the Project site. Additionally, because peak runoff from the Project site would not increase as compared to existing conditions, the Project has no potential to cause or cumulatively contribute to erosion hazards downstream. As such, long-term erosion impacts would be less than significant on a cumulatively-considerable basis.

The Project site is not subject to inundation during the 1% annual chance flood and the Project also is located entirely outside of flood hazard areas mapped in RCFCWCD (RCIT, n.d.). As such, the Project would not impede or redirect flood flows, and cumulatively-considerable impacts would not occur.

Areas planned for development on site are not subject to inundation due to floods, tsunamis, or seiche zones. As such, cumulatively-considerable impacts associated with the release of pollutants due to Project site inundation would not occur.

### 4.10.6 Significance of Impacts Before Mitigation

Thresholds a., b., and i.: Less-than-Significant Impact. The Project would be served potable water by the Eastern Municipal Water District (EMWD), and no groundwater wells are proposed on site. Accordingly, the Project would not directly extract groundwater, and direct impacts to groundwater supplies would be less than significant. Although the Project would increase impervious surface area on site, the total runoff volume generated from the site would be managed through the Project's proposed drainage system, including on-site water quality and detention basins. Following treatment, runoff would be conveyed to downstream facilities within the Santa Margarita River watershed, where groundwater recharge would continue to occur through existing unlined channels and watercourses. Thus, the Project would not interfere substantially with groundwater recharge or contribute to long-term groundwater depletion. With respect to water quality, during construction the Project Applicant would be required to comply with the NPDES General Construction Permit and prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) that identifies Best Management Practices (BMPs) to control erosion, sediment transport, and pollutant discharge. Compliance with the SWPPP and the San Diego Basin Plan would ensure that water quality impacts during grading and site preparation would remain less than significant. During long-term operation, all runoff generated on site would be captured and treated by water quality and detention basins in accordance with the Preliminary Water Quality Management Plan prior to discharge into the downstream watershed. Accordingly, the Project would not violate water quality standards or waste discharge requirements, substantially degrade surface or groundwater quality, deplete groundwater supplies, or conflict with the San Diego Basin Plan. Impacts would be less than significant.

Thresholds c. and f.: Less-than-Significant Impact. Grading proposed as part of the Project would generally maintain the existing drainage patterns on the site, with runoff continuing to flow from the higher elevations in the north toward the south and southeast portions of the site and then offsite toward the southeast. The Project would include construction of on-site storm drain infrastructure and detention basins designed to collect, treat, and detain stormwater flows consistent with County standards. As documented in the Project's Drainage Study (*Technical Appendix I1*), the Project's drainage system has been designed to ensure that post-development peak flows do not exceed pre-development conditions for 100-year storm events. The basins and related conveyance infrastructure would reduce total peak flows from the site, thereby preventing downstream flooding and avoiding alteration of any natural drainage alignments or receiving water features. Additionally, because downstream drainage facilities are adequately sized to accommodate existing runoff and because peak runoff from the Project site would not increase under proposed conditions, the Project would not contribute runoff water that could exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. With mandatory adherence to the SWPPP requirements under the NPDES General Construction Permit, effects associated with construction-related erosion, sedimentation, and stormwater discharge would be minimized through the implementation of Best Management Practices (BMPs). These measures would reduce the potential for adverse impacts to downstream water quality and flood control systems to less-than-significant levels during the construction phase. Following buildout, large portions of the Project site would consist of impervious surfaces, with pervious surfaces limited to designated landscaped and open space areas. Compared to existing

undeveloped conditions, the potential for on-site erosion hazards would be substantially reduced, as the site would be fully graded, stabilized, and served by a permanent drainage system. Additionally, as documented in the Project's Drainage Study, implementation of the Project's proposed drainage improvements would not result in an increase in peak flows from the Project site under 100-year storm conditions, thereby ensuring that post-development runoff would not result in downstream channel degradation or erosion in areas tributary to the Project site. Long-term erosion impacts would therefore be less than significant.

Thresholds e. and g.: Less-than-Significant Impact. The Project site is located outside of mapped 100-year floodplains, according to data published by FEMA. As such, the site is not subject to inundation from riverine flood hazards under existing or projected future conditions. The Project's proposed storm drain infrastructure, including detention basins and conveyance facilities, has been designed in accordance with County of Riverside flood control standards to manage peak runoff and minimize the potential for on-site or off-site flooding. As documented in the Project's Drainage Study, the Project would not result in an increase in peak flows compared to existing conditions during the 100-year storm event. As such, the Project would not substantially increase the rate or volume of surface runoff in a manner that would result in flooding on-site or downstream, nor would it impede or redirect flood flows. Impacts would be less than significant.

Threshold h. No Impact: The Project site is located approximately 31 miles northeast of the Pacific Ocean and is therefore not at risk of tsunami inundation. According to Figure 10 of the Southwest Area Plan (SWAP), the Project site is also not located within a mapped dam inundation area for any nearby reservoirs. As such, the site is not subject to seiche hazards associated with large bodies of water such as Lake Skinner or Diamond Valley Lake. In addition, as discussed under the analysis of Threshold g, areas planned for development on site are not located within a mapped FEMA 100-year flood zone, and the Project site is not subject to riverine flood hazards. Accordingly, the Project would not risk the release of pollutants due to inundation from floods, tsunamis, or seiches. Impacts would be less than significant.

## 4.10.7 Regulations, Design Requirements, and Mitigation

***Regulations and Design Requirements***

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

- The Project Applicant is required to comply with the provisions of the Project's NPDES permit, and the Project's SWPPP. Compliance with the NPDES permit and the SWPPP would identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from storm water and non-stormwater discharges during construction activities.

***Mitigation***

Impacts to hydrology and water quality would be less than significant; therefore, mitigation measures are not required.

## 4.10.8 References


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|---|---|
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# 4.11 LAND USE AND PLANNING

This Subsection discusses the Project's consistency with applicable land use and planning policies adopted by the Riverside County and other governing agencies for the purpose of reducing adverse effects on the physical environment. This Subsection also addresses present and future land uses, zoning, and the physical arrangement of land uses on the Project site. Information used to support the analysis in this Subsection was obtained in part from the Riverside County General Plan (Riverside County, 2021a); the Southwest Area Plan (SWAP) (Riverside County, 2021b); and Riverside County Information Technology (RCIT) Map My County program (RCIT, n.d.). Refer to EIR Section 7.0, *References*, for a complete list of reference sources.

## 4.11.1 Existing Conditions

### A. Existing On-Site and Surrounding Land Uses

Under existing conditions, the Project site is vacant, undeveloped, and is located within the adopted Keller Crossing Specific Plan (SP 380). The southern portion of the Project site is disturbed and was previously used for agricultural purposes including discing and dry farming. The northern portion of the Project site is undeveloped, contains natural vegetation, and has varying topography.

As previously illustrated in EIR Figure 2-3, land immediately north of the Project site consists of rural single-family residences and vacant, undeveloped land. Winchester Road (SR-79) is immediately east of the Project site and lands further east, on the opposite side of SR-79, contains single-family residences on varying lot sizes along with vacant and undeveloped lands. Keller Road is immediately south of the Project site and land further south, on the opposite side of Keller Road, contains single-family residences and vacant, undeveloped land. Land immediately west of the Project site is developed with single-family residences on varying lot sizes.

### B. Existing On-Site and Surrounding Land Use Designations

The Project site is within the boundaries of the adopted Keller Crossing Specific Plan No. 380 (SP 380) area; therefore, the Project site's land use designations are established by the adopted Keller Crossing Specific Plan. Under the current adopted Keller Crossing Specific Plan, the Project site is divided into seven Planning Areas (PAs) (PAs 1 through 7), and is designated for "Very Low Density Residential (VLDR)," "Low Density Residential (LDR)," "Medium Density Residential (MDR)," "Mixed Use," "Commercial Retail (CR)," and "Open Space – Conservation (OS-C)." Table 4.11-1, *Adopted Keller Crossing Specific Plan Land Use Designations*, provides a summary of the existing on-site land use designations and their acreage, while the adopted SP 380 land use plan previously was depicted on EIR Figure 2-5.

As previously shown in EIR Figure 2-4, the land to the immediate north of the Project site is designated for OS-C, "Rural Residential (RR)," LDR, "Open Space – Conservation Habitat (OS-CH)" uses and include MSHCP-dedicated hillsides; land to the east of the Project site, on the opposite side of SR 79, is designated for RR and OS-C uses; land to the south, on the opposite site of Keller Road, is designated for RR and CR

**Table 4.11-1 Adopted Keller Crossing Specific Plan Land Use Designations**

| Planning Area | Specific Plan Designations | Acreage | Dwelling Units | Commercial Building Area |
|---|---|---|---|---|
| 1 | Very Low Density Residential | 9.9 | 3 | -- |
| 2 | Commercial Retail | 8.8 | -- | 125,000 s.f. |
| 3 | Medium Density Residential | 13.9 | 42 | -- |
| 4 | Low Density Residential | 18.3 | 25 | -- |
| 5 | Mixed Use | 39.5 | 250 | 250,000 s.f. |
| 6 | Commercial Retail | 29.0 | -- | 275,000 s.f. |
| 7 | Open Space Conservation | 61.1 | -- | -- |
| -- | Major Roadways | 20.6 | -- | -- |
| **Totals:** | | **201.1** | **320**[1] | **650,000 s.f.** |

1. Includes 225 Continuing Care Retirement Community (CCRC) dwelling units.

uses; and land to the immediate west of the Project are is designated for RR and "Estate Density Residential (EDR)" uses.

## C. Existing On-Site and Surrounding Zoning Classifications

The Riverside County Zoning Ordinance is intended to implement the Riverside County General Plan's land use plan. Under existing conditions, the approximately 196.1-acre Project site is zoned for "Specific Plan Zone (SP Zone)," indicating that the property is within the boundaries of the adopted SP 380. Thus, under existing conditions the Project site is subject to the zoning classifications established by the adopted SP 380, which conform to the General Plan, SWAP, and SP 380 land use designations applied to the site, as described above and as summarized in Table 4.11-1.

Lands to the north of the Project site are zoned for SP Zone (these lands occur within Specific Plan No. 310). Land to the north is also zoned for "Rural Residential (R-R)" land uses. Lands to the east of the Project site also are zoned for SP Zone and R-R land uses (R-R-2 ½), as well as agricultural uses (A-1-5). Land to the west of the Project is zoned for rural residential uses, while land to the south is zoned for rural residential and commercial uses (C-1/C-P). (RCIT, n.d.)

## D. Applicable Land Use and Planning Policies

### *1. Riverside County General Plan*

The Riverside County General Plan is a policy document that reflects the County's vision for the future of Riverside County. The General Plan was comprehensively revised in 2003 and most recently updated in 2021. The General Plan is organized into nine separate elements, including Land Use, Circulation, Multipurpose Open Space, Safety, Noise, Housing, Air Quality, Healthy Communities, and Administration. Each General Plan Element is instrumental to achieving the County's long-term development goals. Each element contains a series of policies that guide the course of action the County must take to achieve the County's vision for future development. (Riverside County, 2021a)

In addition, the General Plan divides the County into 19 Area Plans. The purpose of these Area Plans is to provide more detailed land use and policy direction regarding local issues such as land use, circulation,

open space, and other topical areas. The Project site is located within the SWAP of the General Plan. The SWAP was most recently updated on September 28, 2021. The following section provides a summary of each General Plan Element, while the SWAP is discussed below in subsection 4.11.1.D.2. (Riverside County, 2021b)

***Land Use Element***

The General Plan Land Use Element functions as a guide to planners, the general public, and decision makers as to the ultimate pattern of development. The Land Use Element designates the general distribution, general location, and extent of land uses, such as housing, business, industry, open space, agriculture, natural resources, recreation, and public/quasi-public uses. These designations are reflected on the General Plan Land Use Map, which categorizes individual parcels of land into five basic categories ("Foundation Components"): Rural, Rural Community, Community Development, Agriculture, and Open Space. As reflected on the General Plan Land Use Map, the Land Use Element provides for a balanced mixture of land uses, including commercial, office, industrial, agriculture, and open space. For each of the various land use designations, the General Plan provides standards for residential density and non-residential intensity, and provides specific policies intended to ensure that product types, densities, and intensities respond to a multitude of market segments. The Land Use Element governs how land is to be utilized; therefore, many of the issues and policies contained in other plan elements are linked in some degree to this element. The Project site is currently located within an adopted Specific Plan that is located within the Community Development Foundation Component. The Project site is designated by the General Plan Land Use Plan for a mix of very low, low, and medium density residential, mixed use, commercial retail, and open space land uses. (Riverside County, 2021a, p. LU-1)

***Circulation Element***

The purpose of the Circulation Element is to provide for the movement of goods and people, including pedestrians, bicycles, transit, train, air, and automobile traffic flows within and through the community. Efficient traffic circulation is important to economic viability and the creation and preservation of a quality living environment (Riverside County, 2021a, p. C-1). The Circulation Element designates future road improvements and extensions; addresses non-motorized transportation alternatives; and identifies funding options. The various roadway improvements and extensions contemplated by the Circulation Element are reflected on the General Plan Circulation Plan. The various roadway classifications depicted on the Circulation Plan correspond to specific roadway cross-sections, which provide specific standards for right-of-way widths, lane configurations, medians, and landscaping requirements. As shown on Figure 7 of the SWAP, the Riverside County General Plan and SWAP classify Highway 79 as an "Expressway (128' to 220' ROW)" facility. Along the Project site's frontage, Keller Road is classified as a "Secondary (100' ROW)" facility, while the portion of Pourroy Road located south of Keller Road also is classified as a "Secondary (100' ROW)" facility. The future segment of Pourroy Road that abuts the western boundary of the Project site is not classified by the Circulation Element. (Riverside County, 2021b, Figure 7)

As shown in Figure 8 of the SWAP, there are proposed Community Trails along Leon Road, Keller Road, and Pourroy Road and a proposed regional trail along Abelia Street. (Riverside County, 2021b, Figure 8; Urban Crossroads, 2021f, p. 40)

***Multipurpose Open Space Element***

The Multipurpose Open Space Element addresses forms of open space in the County, including scenic, habitat, and recreation. This element has the purpose of addressing the protection and preservation of natural resources, agriculture, and open space areas; managing mineral resources; preserving and enhancing cultural resources; and providing recreational opportunities for the residents of Riverside County. The Multipurpose Open Space Element also contains figures that detail the locations of water resources, vegetation communities, parks, forests, recreation areas, mineral resources, and cultural resources within the County. Together with the Multiple Species Habitat Conservation Plan (MSHCP), the Multipurpose Open Space Element seeks to preserve and protect identified open space areas in order to maintain or improve environmental quality. (Riverside County, 2021a, p. OS-1)

***Safety Element***

The Safety Element has the primary objective of reducing death, injuries, property damage, and economic and social impact of potential hazards within the County. The Safety Element serves to develop a framework by which safety considerations are introduced into the land use planning process; facilitate the identification and mitigation of hazards for new development; strengthen existing codes, project review, and permitting processes; present policies directed at identifying and reducing hazards in existing development; and strengthen earthquake, flood, inundation, and wildland fire preparedness planning and post-disaster reconstruction policies. Within the Safety Element, policies are presented which pertain to seismic, slope and soil instability; flood and inundation; fire safety; hazardous waste and materials; and disaster preparedness, response, and recovery hazards. (Riverside County, 2021a, pp. S-1 and S-2)

***Noise Element***

The purpose of the Noise Element is to identify sources of noise generation in the County and provide policies to ensure development does not expose people to unacceptable noise levels. The establishment of desirable maximum noise levels and implementation of noise regulations are also included as part of the Noise Element. The Noise Element provides a systematic approach to identifying and managing noise problems in the community; quantifies existing and projected noise levels; addresses excessive noise exposure; and directs community planning for regulation of noise. The Noise Element includes policies, standards, criteria, programs, diagrams, a reference to action items, and maps related to the protection of public health and welfare with respect to noise. (Riverside County, 2021a, p. N-3)

***Housing Element***

The 2021-2029 Housing Element identifies and establishes County policies intended to fulfill the housing needs of existing and future residents in Riverside County. It establishes policies that guide County decision-making and set forth an action plan to implement its housing goals. The Housing

Element includes a review of previous housing goals, an assessment of the effectiveness of those goals, and an assessment of housing needs. Additionally, the Housing Element includes an inventory of resources and constraints related to meeting housing needs in the County; an analysis of affordable housing developments and programs intended to preserve such housing; community goals for the maintenance, preservation, improvement and development of housing; and a program which sets forth a five-year schedule of actions that the County is undertaking or intends to undertake in implementing the polices set forth in the Housing Element. (Riverside County, 2024, p. H-3)

***Air Quality Element***

The intent of the Air Quality Element is to provide background information on the physical and regulatory environment affecting air quality in the County. This element also identifies goals, policies, and programs that are meant to balance the County's actions regarding land use, circulation, and other issues potentially affecting air quality. This element works in conjunction with local and regional air quality planning efforts to address ambient air quality standards set forth by the Federal Environmental Protection Agency (EPA) and the California Air Resources Board (CARB). The Air Quality Element sets ambient air quality standards for various air pollutants based on State and federal standards. The Element also contains policies regarding sensitive receptors, mobile and stationary pollution sources, energy efficiency and conservation, jobs and housing, and transportation. (Riverside County, 2021a, pp. AQ-3 through AQ-31)

***Healthy Communities Element***

The Healthy Communities Element provides a framework for translating the General Plan vision for a healthy Riverside County into reality by identifying policies aimed at achieving that vision. The Element addresses areas where public health and planning intersect, including transportation and active living; access to nutritious foods; access to health care; mental health; quality of life; and environmental health. This Element addresses overall health; land uses and community design; transportation system (with an emphasis on non-motorized transportation); arts and culture; social capital; complete communities; parks, trails, and open space; access to healthy foods and nutrition; healthcare and mental healthcare; schools, recreational centers, and daycare centers; and environmental health. The Environmental Justice section of the Healthy Communities Element identifies environmental justice policies that address quality of life and environmental safety. These environmental justice policies apply to the Environmental Justice Communities ("EJ Communities") shown on Figure LU-4.1, entitled "Riverside County Environmental Justice Communities," within the General Plan Land Use Element with specific policies located in the Healthy Communities Element. (Riverside County, 2021a, pp. HC-1 through HC-12)

***Administration Element***

The Administration Element focuses on the administration of the General Plan, which is the sole responsibility of the County of Riverside, under the authority of the Board of Supervisors. Administration of the General Plan policies includes establishing, maintaining, and applying tools and procedures for interpreting the intent of the General Plan and applying the interpretation to a variety of circumstances. This Element details the vision for Riverside County, General Planning Principles,

Countywide Elements and Planning Policies/Area Plan, Appendices of the General Plan, and other administrative topics. (Riverside County, 2021a, pp. AQ-1 through AQ-20)

### *2. Southwest Area Plan (SWAP)*

As noted above, the Project site is located within the Southwest Area Plan (SWAP) of the Riverside County General Plan. The SWAP guides the evolving character of the area, and uses the County of Riverside General Plan vision to establish policies for development and conservation within the specific area of Riverside County. The SWAP provides a description of the location, physical characteristic, and special features, in addition to a land use plan, policies, and exhibits to better understand the physical, environmental, and regulatory characteristics that comprise the area. Each section of the SWAP addresses critical issues facing the Southwest Area planning area. The SWAP includes sections detailing the features, policy areas, land use, circulation, multipurpose open space, and hazards.

As shown on Figure 4 of the SWAP, *Southwest Area Plan Overlays and Policy Areas*, the Project site is located within the boundaries of adopted SP 380, and also is located within the Highway 79 Policy Area. In addition, SWAP Figure 6, *Southwest Area Plan Mt. Palomar Night Time Lighting Policy Area*, the Project site is located within Zone B of the Mt. Palomar Night Time Lighting Policy Area, indicating that land uses in the Project area are subject to compliance with Riverside County Ordinance No. 655 (Regulating Light Pollution). Additionally, SWAP Figure 9, *Southwest Area Plan Scenic Highways*, indicates that I-15 is "State Eligible" scenic highway. (Riverside County, 2021b, Figures 4 and 9)

### *3. Riverside County Zoning Ordinance*

The Riverside County Zoning Ordinance is intended to implement the Riverside County General Plan's Land Use Plan. Under existing conditions, the approximately 196.1-acre Project site is zoned for "Specific Plan Zone (SP Zone)," indicating that the property is within the boundaries of SP 380 and is subject to the zoning classifications established by the adopted SP 380 zoning ordinance. Refer to subsection 4.11.1.C for a more thorough discussion of the site's existing zoning classifications. (RCIT, n.d.)

### *4. Riverside County Ordinance No. 460 (Regulating the Division of Land)*

This ordinance regulates subdivisions pursuant to the Subdivision Map Act. All land divisions throughout unincorporated Riverside County are subject to all of the applicable provisions of the Subdivision Map Act and this ordinance. Ordinance No. 460 also identifies the necessary improvements associated with the division of land, and includes the provisions for the establishment of Road and Bridge Benefit Districts and associated fees.

### *5. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)*

Riverside County has adopted a Multiple Species Habitat Conservation Plan (MSHCP), which is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP). The MSHCP promotes conservation of species and their associated habitats in Riverside County through implementation of several HCPs that affect lands within the County. The Western Riverside County MSHCP and the Coachella Valley MSHCP are the two dominant plans that impact the largest portions of the county. These plans coordinate multi-

jurisdictional habitat-planning and conservation efforts in the region to promote biological and ecological diversity while accommodating the appropriate construction of new development and infrastructure projects. Riverside County catalogs acquisitions and conservation of lands with respect to the HCPs, and periodically updates the General Plan Land Use maps accordingly. (Riverside County, 2015, p. 4.2-27)

As previously shown on EIR Figure 2-7, the Project site falls within all or portions of MSHCP Criteria Cells 5060, 5070, 5074, 5169, 5173, 5175, and 5275. Refer to EIR Subsection 4.4, *Biological Resources*, for a more thorough discussion of the MSHCP and the Project site's relationship thereto.

### *6. Stephen's Kangaroo Rat Habitat Conservation Plan (SKR HCP)*

The Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW). The County of Riverside is a member agency of the RCHCA. The 30-year SKR HCP was designed to acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens' kangaroo rat-occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens' kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied habitat in seven Core Reserves encompassing over 41,000 acres. (Riverside County, 2015, p. 4.8-52)

On May 3, 1996, the USFWS issued a permit to the Riverside County Habitat Conservation Agency to incidentally take the federally endangered Stephens' kangaroo rat (*Dipodomys stephensi*). Similarly, the CDFW issued a California Endangered Species Act Management Authorization for Implementation of the Stephens' Kangaroo Rat HCP on May 6, 1996. To date, more than $50 million has been dedicated to the establishment and management of a system of regional preserves designed to ensure the survival of SKR in the plan area. This effort resulted in the permanent conservation of approximately 50% of the SKR-occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is managed to ensure its continuing ability to support the species. Core reserves were deemed complete in December of 2003. (Riverside County, 2015, p. 4.8-52)

Although the Project site is not targeted for conservation as part of the SKR HCP, the Project site is located within the SKR HCP fee area, which requires the payment of fees pursuant to Riverside County Ordinance No. 663.

### *7. Southern California Association of Governments (SCAG)*

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments (COG). The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles.

SCAG develops long-range regional transportation plans including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. (SCAG, n.d.)

As an MPO and public agency, SCAG develops transportation and housing strategies that transcend jurisdictional boundaries that affect the quality of life for southern California as a whole. In April 2024, SCAG adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to as "Connect SoCal." The RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. The RTP/SCS includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. The RTP/SCS also provides objectives for meeting emissions reduction targets set forth by CARB; these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning. (SCAG, 2024) The RTP/SCS is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

### *8. South Coast Air Quality Management District Air Quality Management plan (SCAQMD AQMP)*

California Health & Safety Code § 40702 et seq., the California Clean Air Act, requires that an Air Quality Management Plan (AQMP) be developed and then updated every three years for air basins with non-attainment status. As discussed in EIR Section 4.3, *Air Quality*, the Project site is located in the South Coast Air Basin (SCAB). The SCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SCAB into conformity with federal and State air quality standards. Air quality within the SCAB is regulated by the SCAQMD and standards for air quality are documented in the SCAQMD's 2022 AQMP. Although air quality in the SCAB has improved over the past several decades, according to the SCAQMD, the SCAB currently does not meet National Air Quality Standards (NAAQS) attainment status for ozone ($O_3$) and particulate matter less than 2.5 microns ($PM_{2.5}$). The SCAB's currently is considered non-attainment under the California Ambient Air Quality Standards (CAAQS) due to levels of ozone ($O_3$), particulate matter < 2.5 microns ($PM_{2.5}$), and particulate matter < 10 microns ($PM_{10}$). (SCAQMD, 2022)

The SCAQMD AQMP is a plan for the regional improvement of air quality. Projects such as the proposed Project relate to the air quality planning process through the growth forecasts that were used as inputs into the regional transportation model. If a proposed project is consistent with these growth forecasts, and if all available emissions reduction strategies are implemented as effectively as possible on a project-specific basis, then the project is consistent with the AQMP.

## 4.11.2 Applicable Environmental Regulations

### A. Federal Regulations

#### *1. Clean Water Act (CWA)*

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.

#### *2. Federal Aviation Regulations Part 77*

Federal Regulation Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis for:

- Evaluating the effect of the construction or alteration on operating procedures;
- Determining the potential hazardous effect of the proposed construction on air navigation;
- Identifying mitigating measures to enhance safe air navigation; and
- Charting of new objects.

Notification allows the Federal Aviation Administration (FAA) to identify potential aeronautical hazards in advance to prevent or minimize the adverse impacts to the safe and efficient use of navigable airspace. Any person/organization who intends to sponsor any of the following construction or alterations must notify the Administrator of the FAA:

- Any construction or alteration exceeding 200 feet above ground level.
- Any construction or alteration:
  - within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with at least one runway more than 3,200 feet.
  - within 10,000 feet of a public use or military airport which exceeds a 50:1 surface from any point on the runway of each airport with its longest runway no more than 3,200 feet.
  - within 5,000 feet of a public use heliport which exceeds a 25:1 surface.
- Any highway, railroad, or other traverse way whose prescribed adjusted height would exceed that above noted standards.
- When requested by the FAA.

- Any construction or alteration located on a public use airport or heliport regardless of height or location.

Persons failing to comply with the provisions of FAR Part 77 are subject to Civil Penalty under Section 902 of the Federal Aviation Act of 1958, as amended and pursuant to 49 U.S.C. Section 46301(a).

## B. State Regulations

### *1. California Planning and Zoning Law*

The legal framework in which California cities and counties exercise local planning and land use functions is set forth in the California Planning and Zoning Law, §§ 65000 - 66499.58. Under State of California planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. These requirements include the inclusion of seven mandatory elements described in the Government Code, including a section on land use. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures.

### *2. Subdivision Map Act*

The Subdivision Map Act ("Map Act") vests in the cities and counties the power to regulate and control the design and improvement of subdivisions within its boundaries. Each city must adopt an ordinance regulating and controlling subdivisions for which the Map Act requires a tentative and final or parcel map. The authority for a city or county to regulate land use, including subdivisions, flows from the general police power. However, the Map Act sets forth certain mandates that must be followed for subdivision processing. A city can impose conditions on the subdivision process when the Map Act is silent, but it cannot regulate contrary to specific provisions contained in the Map Act. The Map Act's primary goals are:

- To encourage orderly community development by providing for the regulation and control of the design and improvement of the subdivision, with a proper consideration of its relation to adjoining areas;
- To ensure that the areas within the subdivision that are dedicated for public purposes will be properly improved by the subdivider so that they will not become an undue burden on the community; and
- To protect the public and individual transferees from fraud and exploitation.

The Map Act is applied in conjunction with other state land use laws such as the general plan, specific plans, zoning, CEQA, and the Permit Streamlining Act. The Map Act provides for regulation of land divisions by a city or county and is interpreted and enforced by the city or county.

### *3. Office of Planning and Research (OPR) General Plan Guidelines*

Each city and county in California must prepare a comprehensive, long term general plan to guide its future. To assist local governments in meeting this responsibility, the Governor's Office of Planning and Research

(OPR) is required to adopt and periodically revise guidelines for the preparation and content of local general plans pursuant to Government Code § 65040.2. The General Plan Guidelines is advisory, not mandatory. Nevertheless, it is the state's only official document explaining California's legal requirements for general plans. Planners, decision-making bodies, and the public depend upon the General Plan Guidelines for help when preparing local general plans. The courts have periodically referred to the General Plan Guidelines for assistance in determining compliance with planning law. For this reason, the General Plan Guidelines closely adheres to statute and case law. It also relies upon commonly accepted principles of contemporary planning practice.

#### *4. State Aeronautics Act*

The State Aeronautics Commission Act of 1947 created the Division of Aeronautics ("Division"), and was later amended by statute to read the State Aeronautics Act (Aeronautics Act) in 1961. As a result of this legislation, the Division's first priorities are those mandated by the Aeronautics Act, then Caltrans guidance, then Division guidance as expressed through its Policy Element. As directed by the Aeronautics Act, the Division is a steward and advocate of aviation in California. To that end, its efforts are focused on activities that "protect the public interest in aeronautics and aeronautical progress." (§ 21002)

The Aeronautics Act itself is divided into six chapters, the first five of which have not received significant cleanup legislation since its enabling in 1947. The first chapter begins with general provisions and definitions and explains the Legislature's intent for a State aviation program. Chapter two explains Caltrans' role in administering the Division, and explains the role of the California Transportation Commission (CTC). Chapter three includes many of the safety considerations from Federal Aviation Administration (FAA) regulations that help keep airports and the surrounding communities safe and compatible with flight operations. Chapter four deals with airport and heliport permitting, air navigation facilities, noise guidelines, funding, and importantly, the formation and authority of Airport Land Use Commissions (ALUC). Chapter five covers the investigations and hearings on matters covered in the Aeronautics Act. Finally, Chapter six introduces airport planning and specifically introduces the intent of the CASP and how it can be used to support California aviation.

#### *5. Senate Bill 330 – Housing Crisis Act 2019*

To accelerate housing production, Senate Bill 330 (SB 330) makes changes to land use and zoning law to remove barriers and impediments to building new housing in urban areas of the state. To increase transparency and certainty in the development application process, SB 330 allows a housing developer to submit a "preliminary application" to a local agency for a housing development project. Submittal of a pre-application allows a developer to provide a specific subset of information on the proposed housing development ahead of providing the full amount of information required by the local government for a housing development application. Upon submittal of an application and a payment of the permit processing fee, a housing developer is allowed to "freeze" the applicable fees and development standards that apply to their project while they assemble the rest of the material necessary for a full application submittal. SB 330 requires the California Department of Housing and Community Development (HCD) to develop a standardized form that applicants for housing development projects may use for the purpose of satisfying

the requirements for submittal of a preliminary application if a local agency has not developed its own application form. HCD has also provide a template that local governments may use to develop their own preliminary application form.

SB 330 also requires the California Department of Housing and Community Development (HCD) to develop a list of cities ("affected cities") and census designated places (CDPs) within the unincorporated county ("affected counties") that are prohibited from taking certain zoning-related actions, including, among other things: 1) Downzoning certain parcels; 2) Imposing a moratorium on development; and 3) Imposing design review standards that are not objective. The law also requires jurisdiction-wide housing replacement when housing affordable to lower-income residents is demolished. It is important to note that SB 330 does not prohibit an affected county or an affected city from changing a land use designation or zoning ordinance to a less intensive use, provided that the city or county concurrently changes the development standards, policies, and conditions applicable to other parcels within the jurisdiction to ensure that there is no net loss in residential capacity.

The Project would involve a General Plan Amendment and Change of Zone to change the site's existing land use designation and zoning classifications to allow for development of the site with a total of 694 dwelling units in lieu of the 320 dwelling units and commercial retail land uses per the adopted Keller Crossing Specific Plan. Thus, the Project would result in a net increase in the number of dwelling units allowed on site. Furthermore, the provisions of SB 330 that prohibit downzoning of residential property for non-residential use apply only to "affected counties," which are defined by SB 330 as "a census designated place, based on the 2013-2017 American Community Survey 5-year Estimates, that is wholly located within the boundaries of an urbanized area, as designated by the United States Census Bureau." HCD has published a list of 141 CDPs in 22 counties that are identified as "affected counties." The Project site and surrounding areas are not included on the list of "affected counties" pursuant to SB 330. As such, the Project is not subject to compliance with SB 330.

## C. Local Regulations

### *1. SCAG Regional Transportation Plan and Sustainable Communities Strategy*

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code Section 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. In April 2024, SCAG adopted the 2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) ("RTP/SCS"); also referred to herein as "Connect SoCal" with goals to: 1) build and maintain an integrated multimodal transportation network; 2) develop, connect and sustain communities that are livable and thriving; 3) create a healthy region for the people of today and tomorrow; and 4) support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP.

Connect SoCal includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. Connect SoCal is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

#### *2. SCAQMD Air Quality Management Plan*

An AQMP is a plan for the regional improvement of air quality. The SCAQMD *2022 AQMP* is the applicable AQMP for the South Coast Air Basin and was approved by the SCAQMD Governing Board in December 2022 (SCAQMD, 2022). The Project's consistency with the *2022 AQMP* was analyzed in detail in EIR Subsection 4.3, *Air Quality*, and as such is not further evaluated in this Subsection 4.10.

#### *3. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)*

The Western Riverside County MSHCP is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP) focusing on conservation of species and their habitats in Western Riverside County. The Western Riverside County MSHCP was adopted on June 17, 2003, and an Implementing Agreement (IA) was executed between the USFWS, CDFW, and participating entities (including the City of Moreno Valley). Rather than focusing on one species at a time, implementation of the Western Riverside County MSHCP Section 10 Permit preserves native vegetation and meet the habitat needs of multiple species.

The Project site is located within the Reche Canyon Area Plan of the Western Riverside County MSHCP but is not located within a Cell Group, Criteria Cell, or Sub-Unit and is not targeted for conservation. The Project site is located within the MSHCP Burrowing Owl Survey Area but is not located within the Narrow Endemic Plan Species Survey Area (NEPSSA), the Criteria Area Plant Species Survey Area (CAPSSA), or the MSHCP Mammal and Amphibian Survey Areas (RCA, n.d.). The proposed Project's consistency with the Western Riverside County MSHCP is discussed in detail in EIR Section 4.4, *Biological Resources*, and as such is not further evaluated in this Subsection 4.10.

### 4.11.3 Basis for Determining Significance

Section XI of Appendix G to the State CEQA Guidelines, as updated in December 2018, addresses typical adverse effects to land use and planning, and includes the following threshold questions to evaluate the Project's impacts on land use and planning:

- *Would the Project physically divide an established community?*
- *Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

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

a. *Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect; or*

b. *Disrupt or divide the physical arrangement of an established community (including a low-income or minority community).*

The significance thresholds set forth in Riverside County's standard Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts on land use and planning. It should be noted that the Project's consistency with the Western Riverside County MSHCP and the SKR HCP, which are the only habitat conservation plans or natural community conservation plans applicable to the Project site, are evaluated in EIR Subsection 4.4, *Biological Resources*, under the analysis of Threshold a., and the analysis concludes that impacts due to a conflict with the MSHCP and the SKR HCP would be less than significant with mitigation and/or payment of fees pursuant to Riverside County Ordinance No. 663. In addition, the Project's consistency with the SCAQMD 2022 AQMP previously was discussed under the analysis of Threshold a. in EIR Subsection 4.3, *Air Quality*. Project consistency with the MSHCP, SKR HCP, and AQMP are not further discussed in this Subsection.

## 4.11.4 Impact Analysis

| | |
|---|---|
| **Threshold a:** | **Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?** |

### A. Project Consistency with General Plan and Southwest Area Plan (SWAP)

#### *1. General Plan and SWAP Land Use Consistency*

Under existing conditions, the approximately 196.1-acre Project site is located within the boundaries of the Keller Crossing Specific Plan (SP 380). As described in this EIR, the Project Applicant proposes a General Plan Amendment (GPA210004) to redesignate the site's land uses to include "Medium Density Residential (MDR)," "Medium High Density Residential (MHDR)," "High Density Residential (HDR)," "Open Space – Recreation (OS-R)," "Open Space – Conservation (OS-C)," "Open Space – Conservation Habitat (OS-CH)," and "Open Space – Water (OS-W)" to reflect the land use configuration proposed under the updated Tentative Tract Map No. 38163 and Specific Plan Amendment No. SP00380A01 (SP 380A1). With approval of GPA210004, the Project would be consistent with the General Plan and Southwest Area Plan (SWAP) land use designations for the approximately 196.1-acre property.

### *2. General Plan and SWAP Policy Consistency*

A General Plan Policies Consistency Analysis was prepared for the proposed Project in order to demonstrate the Project's consistency with applicable General Plan policies, and is included as EIR *Technical Appendix P*. For more information regarding the Project's consistency with specific applicable Riverside County General Plan and SWAP policies, please refer to *Technical Appendix P*. As concluded therein, the Project would be consistent with or otherwise would not conflict with any of the applicable General Plan and SWAP policies adopted for the purpose of avoiding or reducing significant environmental effects. Accordingly, impacts due to a conflict with applicable General Plan or SWAP policies would be less than significant.

## B. Project Consistency with SCAG's 2024-2050 RTP/SCS

In April 2024, SCAG adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to as "Connect SoCal." The RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in the RTP/SCS are pertinent to the proposed Project. These goals are meant to provide guidance for considering the proposed Project within the context of regional goals and policies. An analysis of the Project's consistency with the relevant goals of Connect SoCal is presented below in Table 4.11-2, *Analysis of Consistency with Connect SoCal Goals*. As indicated, the Project would not conflict with any Connect SoCal goals, and no impact would occur.

**Table 4.11-2 Analysis of Consistency with Connect SoCal Goals**

| 2024-2050 RTP/SCA Regional Planning Policies | Project Consistency |
|---|---|
| **Mobility** | |
| ***System Preservation and Resilience*** | |
| 01. Prioritize repair, maintenance and preservation of the SCAG region's existing transportation assets, following a "Fix-It-First" principle | Not Applicable. RTP/SCS Policy 01 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| 02. Promote transportation investments that advance progress toward the achievement of asset management targets, including the condition of the National Highway System pavement and bridges and transit assets (rolling stock, equipment, facilities and infrastructure) | Not Applicable. RTP/SCS Policy 02 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| ***Complete Streets*** | |
| 03. Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit) | Consistent with Applicable Components. The Keller Crossing project includes a network of improved public roadways that promote a safe and accessible multimodal environment. As shown on Figure 2-4, *Conceptual Pedestrian Circulation Plan*, of the proposed SP 380A1, all of the Project's backbone roadways have been designed to include trails within landscaped parkways along both sides of the roadway. In addition, all roadway improvements proposed as part |

| 2024-2050 RTP/SCA Regional Planning Policies | Project Consistency |
|---|---|
| | of the Project would accommodate bicycle traffic. These components collectively promote walkability, active transportation, and safer travel for people of all ages and abilities. |
| 04. Ensure the implementation of Complete Streets that are sensitive to urban, suburban or rural contexts and improve transportation safety for all, but especially for vulnerable road users (e.g., people, especially older adults and children, walking and biking) | Consistent. The roadway and pedestrian network proposed as part of the Project is context-sensitive to the suburban setting and prioritizes pedestrian safety. The proposed curb-separated sidewalks, wide parkways, and a decomposed granite trail along Keller Road would contribute to a safe, walkable community environment. Enhanced sidewalk widths along key corridors and the provision of dedicated recreational pathways also would meet the needs of older adults and children, consistent with Complete Streets safety objectives. |
| 05. Facilitate the implementation of Complete Streets and curb space management strategies that accommodate and optimize new technologies, micromobility devices and first/last mile connections to transit and last-mile delivery | Consistent. The Project integrates Complete Streets elements that support first/last mile connections and accommodate future micromobility options. The Project's internal street network includes wide sidewalks, decomposed granite trails, and pedestrian-friendly features that facilitate safe access to potential future transit stops. The roadway design is flexible enough to accommodate emerging transportation modes and technologies. |
| 06. Support implementation of Complete Streets improvements in Priority Equity Communities, particularly with respect to Transportation Equity Zones, as a way to enhance mobility, safety and access to opportunities | Not Applicable. The Project is not located in a designated Priority Equity Community, although the Project incorporates Complete Streets improvements that would enhance mobility and access for future residents. The Project design includes wide sidewalks, trails, and traffic calming features that would improve pedestrian and bicycle safety and promote access to regional roadways and nearby community amenities. |
| ***Transit and Multimodal Integration*** | |
| 07. Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility and safety | Not Applicable. RTP/SCS Policies 07-11 provide direction to County and regional agency staff and decision makers and are not applicable to the proposed Project. |
| 08. Support connections across the public, private and nonprofit sectors to develop transportation projects and programs that result in improved connectivity | |
| 09. Encourage residential and employment development in areas surrounding existing and planned transit/rail stations | |
| 10. Support the implementation of transportation | |

| 2024-2050 RTP/SCA Regional Planning Policies | Project Consistency |
|---|---|
| projects in Priority Equity Communities, particularly with respect to Transportation Equity Zones, as a way to enhance mobility, safety and access to opportunities | |
| 11. Create a resilient transportation system by preparing for emergencies and the impacts of climate change | |
| ***Transportation System Management*** | |
| 12. Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the existing transportation system instead of adding roadway capacity, where possible | Not Applicable. RTP/SCS policies 12 and 13 provide direction to County and regional agency staff and decision makers and are not applicable to the proposed Project. |
| 13. Prioritize transportation investments that increase travel time reliability, including build-out of the regional express lanes network | |
| ***Transportation Demand Management*** | |
| 14. Encourage the development of transportation projects that provide convenient, cost-effective and safe alternatives to single-occupancy vehicle travel (e.g., trips made by foot, on bikes, via transit, etc.) | Not Applicable. RTP/SCS Policy 14 relates to transportation projects and the proposed Project is not a transportation project. The Project entails the development of a property in an existing urban environment utilizing an existing street network. Notwithstanding, the Project area currently is served by Riverside Transit Agency (RTA) Route 61. Route 61 runs along portions of Winchester Road and Keller Road, with the nearest existing bus stops occurring at the intersection of Winchester Road and Pourroy Road, approximately 0.8-mile south of the Project site. |
| 15. Encourage jurisdictions and TDM practitioners to develop and expand local plans and policies to promote alternatives to single occupancy vehicle travel for residents, workers and visitors | Not Applicable. RTP/SCS Policy 15 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| 16. Encourage municipalities to update existing (legacy) TDM ordinances by incorporating new travel modes and new technology and by incorporating employment and residential sites of certain populations – for example, employers who have less than 250 employees (below the 250 or more employees threshold identified in AQMD's Rule 2202) | Not Applicable. RTP/SCS Policy 16 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| ***Technology Integration*** | |
| 17. Support the implementation of technology designed to provide equal access to mobility, employment, economic opportunity, education, health and other quality-of-life opportunities for all residents within the SCAG region | Not Applicable. RTP/SCS Policies 17 to 21 provide direction to County and regional agency staff and decision makers and are not applicable to the proposed Project. |
| 18. Advocate for data sharing between the public and | |

| 2024-2050 RTP/SCA Regional Planning Policies | Project Consistency |
|---|---|
| private sectors to effectively evaluate the services' benefits and impacts on communities while protecting data security and privacy | |
| 19. Advocate for technology that is adaptive and responsive to ensure it remains up to date and meets the evolving needs of users and stakeholders | |
| 20. Promote technology that has the capacity to facilitate economic growth, improve workforce development opportunities, and enhance safety and security | |
| 21. Proactively monitor and plan for the development, deployment and commercialization of new technology as it relates to integration with transportation infrastructure | |
| ***Safety*** | |
| 22. Eliminate transportation-related fatalities and serious injuries (especially those involving vulnerable road users, such as people, especially older adults and children, walking and biking) on the regional multimodal transportation system | Not Applicable. RTP/SCS Policy 22 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| 23. Integrate the assessment of equity into the regional transportation safety and security planning process, focusing on the analysis and mitigation of disproportionate impacts on disadvantaged communities | Not Applicable. RTP/SCS Policy 23 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. Additionally, the Project site is not located within a Census tract that is classified as a disadvantaged community pursuant to State Senate Bill 535. |
| 24. Support innovative approaches for addressing transit safety and security issues so that impacts to transit employees and the public are minimized and those experiencing issues (e.g., unhoused persons) are supported | Not Applicable. RTP/SCS Policy 24 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| 25. Support the use of transportation safety and system security data in investment decision-making, including consideration of new highway and transit/rail investments that would address safety and security needs | Not Applicable. RTP/SCS Policy 25 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| ***Funding the System/Users Fees*** | |
| 26. Promote stability and sustainability for core state and federal transportation funding sources | Not Applicable. RTP/SCS Policy 26 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| 27. Establish a user fee–based system that better reflects the true cost of transportation, provides firewall protection for new and existing transportation funds, and represents equitable distribution of costs and benefits | Not Applicable. RTP/SCS Policy 27 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. Additionally, the Project's Traffic Study (EIR *Technical Appendix L2*) identifies improvements, fair share |

| 2024-2050 RTP/SCA Regional Planning Policies | Project Consistency |
|---|---|
| | contributions, and fee contributions to the County's DIF and/or TUMF programs, which would ensure that all study area intersections would operate at an acceptable Level of Service (LOS). |
| 28. Pursue funding tools that promote access to opportunity and support economic development through innovative mobility programs | Not Applicable. RTP/SCS Policies 28 to 31 provides direction to County and regional agency staff and decision makers and are not applicable to the proposed Project. |
| 29. Promote national and state programs that include return-to-source guarantees while maintaining the flexibility to reward regions that continue to commit substantial local resources | |
| 30. Leverage locally available funding with innovative financing tools to attract private capital and accelerate project delivery | |
| 31. Promote local funding strategies that maximize the value of public assets while improving mobility, sustainability and resilience | |
| **Communities** | |
| ***Priority Development Areas*** | |
| 32. Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities | Not Applicable. RTP/SCS Policies 32 and 33 provide direction to County and regional agency staff and decision makers and are not applicable to the proposed Project. |
| 33. Promote the growth of origins and destinations, in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicle (SOV) dependency and vehicle miles traveled | |
| 34. Seek to realize scale economies or a critical mass of jobs and destinations in areas across the region that can support non-SOV options and shorter trip distances, combined trips and reduced vehicle miles traveled | Not Applicable. This policy pertains to employment-generating development and is not applicable to the proposed Project, which does not include commercial or employment-focused land uses. |
| ***Housing the Region*** | |
| 35. Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and similar) to further fair housing access and equity across the region | Consistent. The proposed Project includes a mix of residential land uses, including MDR, MHDR, and HDR. The Project site is located in proximity to a variety of important resources and amenities, including schools (Menifee Union and Perris Union High School Districts), employment centers, medical facilities, and parks available within the surrounding areas and in particular within the cities of Menifee and Murrieta. The Project also includes on-site open space, recreational amenities, and circulation improvements that would enhance accessibility within and beyond the site. As |

| 2024-2050 RTP/SCA Regional Planning Policies | Project Consistency |
|---|---|
| | such, the Project supports fair housing access and equitable distribution of housing opportunities consistent with SCAG's regional housing goals. |
| 36. Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities | Consistent. The proposed Project includes a range of residential land uses with development intensities that support walkability and future transit. The Project's Tentative Tract Map incorporates an internal street network designed to promote pedestrian connectivity, with designated pedestrian paths, sidewalks, and local roadways that provide access to regional arterials such as Keller Road and Winchester Road. The Project's location along established and planned circulation corridors positions it to support future transit expansion in the area, consistent with SCAG's goals for resilient, interconnected communities. |
| 37. Support local, regional, state and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region | Consistent. The proposed Project supports regional and local efforts to address housing needs by providing a range of residential densities, including MDR, MHDR, and HDR. This diversity of housing types would allow for a broader range of affordability and housing choice, consistent with State and regional goals to increase the housing supply. The Project complements local housing element efforts and contributes to meeting the SCAG region's broader housing production objectives. |
| 38. Prioritize communities that are vulnerable to displacement pressures by supporting community stabilization and increasing access to housing that meets the needs of the region | Not Applicable. RTP/SCS Policies 38 to 41 provide direction to County and regional agency staff and decision makers and are not applicable to the proposed Project. |
| 39. Promote innovative strategies and partnerships to increase homeownership opportunities across the region with an emphasis on communities that have been historically impacted by redlining and other systemic barriers to homeownership for people of color and other marginalized groups | |
| 40. Advocate for and support programs that emphasize reducing housing cost burden (for renters and homeowners), with a focus on the communities with the greatest needs and vulnerabilities | |
| 41. Support efforts to increase housing and services for people experiencing homelessness across the region | |
| ***15-Minute Communities*** | |
| 42. Promote 15-minute communities as places with a mix of complementary land uses and accessible mobility options that align with and support the diversity of places (or communities) across the region. These are | Consistent. The proposed Project contributes to the creation of a 15-minute community by integrating a variety of residential land uses with open space, recreational areas, and an internal street network that |

| 2024-2050 RTP/SCA Regional Planning Policies | Project Consistency |
|---|---|
| communities where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in fewer and shorter trips because of the proximity of complementary land uses | supports active transportation. The Project design facilitates access to day-to-day needs through walkable neighborhood streets and proximity to existing and planned regional corridors, such as Winchester Road and Keller Road. These features would reduce vehicle dependency and support shorter, local trips by offering access to essential services, recreation, and future transit opportunities within a 15-minute walk or bike ride. |
| 43. Support communities across the region to realize 15-minute communities through incremental changes that improve equity, quality of life, public health, mobility, sustainability, resilience and economic vitality | Not Applicable. RTP/SCS Policy 43 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| 44. Encourage efforts that elevate innovative approaches to increasing access to neighborhood destinations and amenities through an array of people-centered mobility options | Not Applicable. RTP/SCS Policy 44 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| ***Equitable Engagement and Decision-Making*** | |
| 45. Advance community-centered interventions, resources and programming that serve the most disadvantaged communities and people in the region, like Priority Equity Communities, with strategies that can be implemented in the short-to-long-term | Not Applicable. RTP/SCS Policies 45 to 47 provide direction to County and regional agency staff and decision makers and are not applicable to the proposed Project. |
| 46. Promote racial equity that is grounded in the recognition of the past and current harms of systemic racism and one that advances restorative justice | |
| 47. Increase equitable, inclusive, and meaningful representation and participation of people of color and disadvantaged communities in planning processes | |
| **Environment** | |
| ***Sustainable Development*** | |
| 48. Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption and promote resilience | Consistent. As presented throughout this EIR, the Project's impacts to the environment would be less than significant or would be reduced to the maximum feasible extent with the implementation of mitigation measures. Additionally, the analysis presented in EIR Subsection 4.6, *Energy*, demonstrates that with mandatory compliance with applicable federal and State regulations and requirements, including the provisions of the Title 24 Building Energy Standards, Project construction and operation would not result in the inefficient, wasteful, or unnecessary consumption of energy. |
| 49. Support communities across the region to advance innovative sustainable development practices | Not Applicable. RTP/SCS Policy 49 provides direction to County and regional agency staff and decision makers |

| 2024-2050 RTP/SCA Regional Planning Policies | Project Consistency |
|---|---|
| | and is not applicable to the proposed Project. |
| 50. Recognize and support the diversity of communities across the region by promoting local place-making, planning and development efforts that advance equity, mobility, resilience and sustainability | Not Applicable. RTP/SCS Policy 50 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| ***Air Quality*** | |
| 51. Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts | Consistent with Applicable Components. As evaluated herein and in EIR Subsections 4.3, *Air Quality*, and 4.8, *Greenhouse Gas Emissions*, the Project's emissions would be below the SCAQMD thresholds of significance for criteria pollutants, with exception of construction-related $NO_X$ emissions which would be mitigated to less-than-significant levels with implementation of Mitigation Measure MM 4.3-1. Additionally, the Project would not subject nearby sensitive emission receptors to substantial pollutant concentrations. The Project would be constructed in full compliance with the applicable Title 24 Energy Efficiency standards, and would promote non-vehicular forms of transportation. |
| 52. Support investments that reduce hazardous air pollutants and greenhouse gas emissions | |
| 53. Reduce the exposure and impacts of emissions and pollutants and promote local and regional efforts that improve air quality for vulnerable populations, including but not limited to Priority Equity Communities and the AB 617 Communities | |
| ***Clean Transportation*** | |
| 54. Accelerate the deployment of a zero-emission transportation system and use near-zero-emission technology to offer short-term benefits where zero-emissions solutions are not yet feasible or commercially viable | Not Applicable. RTP/SCS Policies 54 to 57 provide direction to County and regional agency staff and decision makers and are not applicable to the proposed Project. |
| 55. Promote equitable use of and access to clean transportation technologies so that all may benefit from them | |
| 56. Consider the full environmental life cycle of clean transportation technologies, including upstream production and end of life as an important part of meeting SCAG's objectives in economic development and recovery, resilience planning and achievement of equity | |
| 57. Maintain a technology-neutral approach in the study of, advancement of and investment in clean transportation technology | |
| ***Natural and Agricultural Lands Preservation*** | |
| 58. Prioritize the climate mitigation, adaptation, resilience and economic benefits of natural and agricultural lands in the region | Not Applicable. RTP/SCS Policy 58 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| 59. Support conservation of habitats that are prone to hazards exacerbated by climate change, such as wildfires and flooding | Not Applicable. RTP/SCS Policy 59 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| 60. Support regional conservation planning and | Not Applicable. RTP/SCS Policy 60 provides direction to |

| 2024-2050 RTP/SCA Regional Planning Policies | Project Consistency |
|---|---|
| collaboration across the region | County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| 61. Encourage the protection and restoration of natural habitat and wildlife corridors | Not Applicable. RTP/SCS Policy 61 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. Additionally, the Project has been designed to accommodate 61.42 acres of conserved open space that would be dedicated to the Regional Conservation Authority as part of the MSHCP Reserve System, which has been designed to accommodate regional wildlife movement corridors. |
| 62. Encourage the conservation and viability of agricultural lands to protect the regional and local food supply and ensure the sustainability of local agriculture as a vital part of the region's economy | Not Applicable. RTP/SCS Policy 62 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. In addition, the Project site is located in a fully urbanized area and the Project site contains no important agricultural lands under existing conditions. |
| 63. Encourage policy development of the link between natural and agricultural conservation with public health | Not Applicable. RTP/SCS Policy 63 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| ***Climate Resilience*** | |
| 64. Prioritize the most vulnerable populations and communities subject to climate hazards to help the people, places and infrastructure that are most at risk for climate change impacts. In doing so, recognize that disadvantaged communities are often overburdened | Not Applicable. RTP/SCS Polices 64 to 68 provide direction to County and regional agency staff and decision makers, and are not applicable to the proposed Project. |
| 65. Support local and regional climate and hazard planning and implementation efforts for transportation, land use, and other factors | |
| 66. Support nature-based solutions to increase regional resilience of the natural and built environment | |
| 67. Promote sustainable water use planning, practices and storage that improve regional water security and resilience in a drier environment | |
| 68. Support an integrated planning approach to help local jurisdictions meet housing production needs in a drier environment | |
| **Economy** | |
| ***Goods Movement*** | |
| 69. Leverage and prioritize investments, particularly where there are mutual co-benefits to both freight and passenger/commuter rail | Not Applicable. RTP/SCS Policies 69 to 73 provide direction to County and regional agency staff and decision makers and are not applicable to the proposed Project. |
| 70. Prioritize community and environmental justice concerns, together with economic needs, and support workforce development opportunities, particularly | |

| 2024-2050 RTP/SCA Regional Planning Policies | Project Consistency |
|---|---|
| around deployment of zero-emission and clean technologies and their supporting infrastructure | |
| 71. Explore and advance the transition toward zero-emission and clean technologies and other transformative technologies, where viable | |
| 72. Advance comprehensive, systems-level planning of corridor/supply chain operational strategies that is integrated with road and rail infrastructure and inland port concepts | |
| 73. Ensure continued, significant investment in a safe, secure, clean and efficient transportation system – including both highways and rail – to support the intermodal movement of goods across the region | |
| ***Broadband*** | |
| 74. Support ubiquitous regional broadband deployment and access to provide the necessary infrastructure and capability for Smart Cities strategies—to ensure the benefits of these strategies improve safety and are distributed equitably | Not Applicable. RTP/SCS Policies 74 to 79 provide direction to County and regional agency staff and decision makers and are not applicable to the proposed Project. |
| 75. Develop networks that are efficient, scalable, resilient and sustainable to support transportation systems management, operations services and "tele-everything" strategies that reduce vehicle miles traveled, optimize efficiency and accommodate future growth of regional economies | |
| 76. Encourage investments that provide access to digital activities that support educational, financial and economic growth | |
| 77. Advocate for current, accurate data to identify opportunity zones and solutions that support the development of broadband services to community anchor institutions and local businesses | |
| 78. Promote an atmosphere that allows for healthy competition and speed-driven innovative solutions while remaining technologically neutral | |
| 79. Use a bottom-up approach to identify and support a community's broadband needs | |
| ***Universal Basic Mobility*** | |
| 80. Encourage partnerships and policies to broaden safe and efficient access to a range of mobility services that improve connections to jobs, education and basic services | Not Applicable. RTP/SCS Policy 80 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. Notwithstanding, the Project Site is located in a portion of the County with access to public transit, basic services, and employment opportunities. |
| 81. Promote increased payment credentials for | Not Applicable. RTP/SCS Policy 81 provides direction to |

| 2024-2050 RTP/SCA Regional Planning Policies | Project Consistency |
|---|---|
| disadvantaged community members and the transition of cash users to digital payment technologies to address payment barriers | County and regional agency staff and decision makers and is not applicable to the proposed Project. |
| ***Workforce Development*** | |
| 82. Foster a positive business climate by promoting regional collaboration in workforce and economic development between cities, counties, educational institutions and employers | Not Applicable. RTP/SCS Policies 82 to 86 provide direction to County and regional agency staff and decision makers and are not applicable to the proposed Project. |
| 83. Encourage inclusive workforce development that promotes upward economic mobility | |
| 84. Support entrepreneurial growth with a focus on underrepresented communities | |
| 85. Foster a resilient workforce that is poised to effectively respond to changing economic conditions (e.g., market dynamics, technological advances and climate change) | |
| 86. Inform and facilitate data-driven decision-making about the region's workforce | |
| ***Tourism*** | |
| 87. Consult and collaborate with state, county and local agencies within the region that are charged with promoting tourism and transportation | Not Applicable. RTP/SCS Policies 87 and 88 provide direction to County and regional agency staff and decision makers and are not applicable to the proposed Project. |
| 88. Encourage the reduced use of cars by visitors to the region by working with state, county and local agencies (e.g., park services, transportation agencies) to highlight and increase access to alternative options, including transit, passenger rail and active transportation | |

(SCAG, 2024, pp. 113-121)

### C. Land Use Compatibility

The Project as evaluated herein would provide for the future development of the approximately 196.1-acre Project site with a mixture of MDR, MHDR, and HDR residential land uses, along with recreational and open space land uses. Under existing conditions, land to the west and north of the Project site includes vacant and undeveloped land along with several rural residential homes. Keller Road abuts the southern boundary of the Project site, beyond which are undeveloped lands and a few residential homes, with a master-planned residential community located further to the south. State Route-79 (SR-79) abuts the eastern boundary of the Project site, beyond which are undeveloped lands and a few rural residential homes.

The Riverside County General Plan and SWAP designate lands to the west and south of the Project site for RR and EDR land uses, with a small area to the south also designated for CR land uses. Lands to the north of the Project site are designated for OS-C and RR uses. Lands to the east of the Project site and SR-79 are designated for RR and OS-C land uses.

Impacts associated with the Project's potential land use compatibility with surrounding uses have been evaluated throughout this EIR under the appropriate subject headings. For example, EIR Subsection 4.3, *Air Quality*, includes an assessment of potential localized air quality impacts that could result from Project implementation. As concluded in EIR Subsection 4.3, the Project's localized air quality impacts affecting surrounding sensitive receptors, including residential and commercial uses, would be less than significant with mitigation to address the Project's construction-related $NO_X$ emissions. EIR Subsection 4.9, *Hazards and Hazardous Materials*, includes an analysis of potential hazardous materials impacts that could affect surrounding land uses, and demonstrates that with mandatory regulatory compliance, impacts associated with hazards and hazardous materials would be less than significant. EIR Subsection 4.13, *Noise*, includes an assessment of potential noise impacts associated with the Project, including noise from construction, site operations, and Project-related traffic, and concludes that with mitigation, Project impacts would be less than significant. There are no environmental effects to surrounding existing or planned land uses that have not already been evaluated throughout this EIR, and where necessary mitigation measures have been imposed on the Project to reduce potential impacts to less-than-significant levels.

With implementation of the measures described above to address environmental issues (e.g., air quality, etc.), the Project's potential impacts due to land use compatibility would be less than significant.

| **Threshold b: Would the Project disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?** |
|---|

Under existing conditions, the Project site is undeveloped and contains no public thoroughfares, aside from Keller Road along the site's southern boundary which is planned for improvement and realignment as part of the Project. Rural single-family residential homes occur in areas surrounding the Project site, along with undeveloped and vacant lands. The Project would accommodate improvements to Keller Road adjacent to the Project site, which would facilitate access in the local area. There are no components of the proposed Project that would disrupt or divide the physical arrangement of an established community, and no impact would occur.

### 4.11.5 Cumulative Impact Analysis

As indicated under the analysis of Threshold a., with approval of GPA 210004, the Project's proposed land uses would be fully consistent with the General Plan and SWAP land use designations for the site. Additionally, the proposed Project would not conflict with any of the policies included in the General Plan or SWAP, and would not conflict with the SCAG 2024-2050 RTP/SCS. Other developments within the western Riverside County region similarly would be required to demonstrate compliance with applicable General Plan and RTP/SCS policies. Thus, the Project's impacts due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less-than-cumulatively considerable.

As indicated under the analysis of Threshold b., the Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community). As such, cumulatively-considerable impacts would not occur.

### 4.11.6 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. The Project would not conflict with the General Plan, SWAP, the SCAG 2024-2050 RTP/SCS, or any other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Additionally, there are no impacts due to land use incompatibility that have not already been evaluated and mitigated to the maximum feasible extent in relevant sections of this EIR; therefore, Project impacts due to land use incompatibility would be less than significant.

Threshold b.: No Impact. The Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community), and impacts would be less than significant

### 4.11.7 Regulations, Design Requirements, and Mitigation

Impacts to land use and planning would be less than significant; therefore, mitigation measures are not required.

### 4.11.8 References


| Cited As | Reference |
|---|---|
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# 4.12 MINERAL RESOURCES

This Subsection describes the potential mineral resources that are located on the Project site and in the vicinity and evaluates the potential effects that the Project may have on these resources. The following analysis is based in part on information obtained in the County's General Plan (Riverside County, 2021a). The analysis in this Subsection also is based on information from the report titled, "Updated Geotechnical and Infiltration Evaluation, Proposed Single-Family Residential Development, Keller Crossing Project, Northwest Corner of Winchester Road and Keller Road, Winchester Area of Riverside County, California" (herein, "GeoTek"), dated May 25, 2021, and included as EIR *Technical Appendix F1* (GeoTek, Inc., 2021). In addition, relevant background information was obtained from the Phase I Environmental Site Assessment (ESA) prepared by Tetra Tech, Inc., dated July 27, 2020, and included as *Technical Appendix H1*, and from the subsequent Limited Phase II ESA prepared by Tetra Tech, dated December 31, 2024, included as *Technical Appendix H2* (Tetra Tech, 2020; Tetra Tech, 2024). These reports provide context regarding historical site use and subsurface conditions that inform the analysis of potential mineral resource availability or constraints.

## 4.12.1 Existing Conditions

### A. Geology

The Project site is located in the Peninsular Ranges Geomorphic Province of Southern California. The Peninsular Ranges are essentially a series of northwest-southeast oriented fault blocks. Several major fault zones are found in this province. The Elsinore Fault zone and the San Jacinto Fault zone trend northwest-southeast and are mostly found near the middle of the province. The San Andreas Fault zone borders the northeasterly margin of the province, and the San Jacinto fault borders the province adjacent the Colorado Desert province. (GeoTek, Inc., 2021)

Geologic mapping indicates that the Project site is predominantly underlain by meta-sedimentary phyllite bedrock (phyllite and schist, with abundant feldspar and quartz), with areas in the southeast, south, and west of the site underlain by older alluvial deposits. These consist of very old alluvium and residual soils overlying the bedrock surface (GeoTek, Inc., 2021). Surface soil conditions observed in the 2024 Limited Phase II ESA (Tetra Tech, 2024) (included as *Technical Appendix H2*) are consistent with this characterization, confirming the presence of shallow soils overlying native bedrock throughout the site.

### B. Mineral Resources Potential

The Surface Mining and Reclamation Act of 1975 (SMARA, Public Resources Code, §§ 2710-2796) provides a comprehensive surface mining and reclamation policy with the regulation of surface mining operations to assure that adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. The SMARA requires the State Geologist to classify land according to the presence, absence, or likely occurrence of significant mineral deposits in certain areas of the State subject to urban expansion or land uses incompatible with mining. The State classification system is broken out into four general zones, as shown below in Table 4.12-1, *Mineral Resources Zones*. According to mapping information available from the California Department of Conservation (CDC), the Project site occurs within an area that has not been

studied for mineral resources (CDC, n.d.). Accordingly, the Project site does not contain any areas of known mineral resources.

**Table 4.12-1 Mineral Resources Zones**

| Zone | Significance |
|---|---|
| MRZ-1 | Areas where the available geologic information indicates no significant mineral deposits or a minimal likelihood of significant mineral deposits. |
| MRZ-2a | Areas where the available geologic information indicates that there are significant mineral deposits. |
| MRZ-2b | Areas where the available geologic information indicates that there is a likelihood of significant mineral deposits. |
| MRZ-3a | Areas where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined. |
| MRZ-4 | Areas where there is not enough information available to determine the presence or absence of mineral deposits. |

(Riverside County, 2021a, pp. OS-37 to OS-38)

## 4.12.2 Applicable Regulatory Requirements

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

### A. State Regulations

*1. Surface Mining and Reclamation Act of 1975*

The Surface Mining and Reclamation Act of 1975 (SMARA, Public Resources Code, §§ 2710-2796) provides a comprehensive surface mining and reclamation policy with the regulation of surface mining operations to assure that adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. SMARA also encourages the production, conservation, and protection of the state's mineral resources. Public Resources Code § 2207 provides annual reporting requirements for all mines in the state, under which the State Mining and Geology Board is also granted authority and obligations.

SMARA, Chapter 9, Division 2 of the Public Resources Code, requires the State Mining and Geology Board to adopt State policy for the reclamation of mined lands and the conservation of mineral resources. These policies are prepared in accordance with the Administrative Procedures Act, (Government Code) and are found in California Code of Regulations, Title 14, Division 2, Chapter 8, Subchapter 1.

## 4.12.3 Basis for Determining Significance

Section XII of Appendix G to the CEQA Guidelines addresses typical adverse effects to mineral resources, and includes the following threshold questions to evaluate the Project's impacts on mineral resources:

- *Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state;*

- *Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.*

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

a. *Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State;*

b. *Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan;*

c. *Be an incompatible land use located adjacent to a State classified or designated area or existing surface mine; or*

d. *Expose people or property to hazards from proposed, existing or abandoned quarries or mines.*

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

### 4.12.4 Impact Analysis

| | |
|---|---|
| **Threshold a:** | **Would the Project result in the loss of availability of a known mineral resource that would be a value to the region or the residents of the State?** |

According to the CDC, the Project site occurs within an area that has not been studied for mineral resources (CDC, n.d.). Therefore, the Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact to known mineral resources.

| | |
|---|---|
| **Threshold b:** | **Would the Project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?** |

The Project site is not designated as a mineral resource recovery site by the County's General Plan, Southwest Area Plan (SWAP), or the adopted SP 380, and there are no other land use plans that identify the site for containing mineral resources. Accordingly, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan, and no impact would occur.

| | |
|---|---|
| **Threshold c:** | **Be an incompatible land use located adjacent to a State classified or designated area or existing surface mine?** |

As mapped by the CDC, there are no areas surrounding the Project site that contain known mineral resources. No lands in the Project vicinity are classified or designated by the State as containing mineral resource deposits, and there are no known surface mines in the Project vicinity. The nearest lands designated as MRZ-2 are located approximately 13.5 miles southwest of the Project site within the City of Temecula. (CDC, n.d.) Accordingly, the Project would not be an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and no impact would occur.

| | |
|---|---|
| **Threshold d:** | **Expose people or property to hazards from proposed, existing or abandoned quarries or mines?** |

Historical records reviewed in the Phase I Environmental Site Assessment (Technical Appendix H1) indicate that no quarrying or mining activities have occurred on the Project site, and there is no evidence of proposed, existing, or abandoned quarries in the surrounding area (Tetra Tech, 2020). Accordingly, the Project would not expose people or property to hazards associated with mining operations, and no impact would occur.

### 4.12.5 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects within the western Riverside County region. This cumulative study area was selected because western Riverside County encompasses large areas that include geologic conditions similar to those that occur on the Project site, and because this study area encompasses a large portion of the local market for the production and consumption of mineral resources.

As mapped by the CDC, the Project site occurs within an area that has not been studied for mineral resources. As such, the Project has no potential to result in cumulatively-considerable impacts due to the loss of availability of a known mineral resource that would be of value to the region or residents of the State. No cumulatively-considerable impacts would occur.

Riverside County's General Plan, SWAP, and the adopted SP 380 do not designate the Project site or surrounding areas as a mineral resource recovery site, and there are no other land use plans that identify the site or surrounding areas for containing mineral resources. As such, the Project has no potential to result in cumulatively-considerable impacts due to the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No cumulatively-considerable impacts would occur.

There are no lands in the Project vicinity that include State classified or designated areas for mineral resources, and there are no existing surface mines in the Project vicinity. As such, no cumulatively-considerable impacts to State classified or designated areas or existing surface mines would occur.

There are no known proposed, existing, or abandoned quarries or mines in the Project vicinity. As such, the Project has no potential to expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no cumulatively-considerable impacts would occur.

### 4.12.6 Significance of Impacts Before Mitigation

Threshold a.: No Impact. The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact to known mineral resources.

Threshold b.: No Impact. The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan, and no impact would occur.

Threshold c.: No Impact. The Project would not be an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and no impact would occur.

Threshold d.: No Impact. The Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no impact would occur

### 4.12.7 Regulations, Design Requirements, and Mitigation

No impacts to mineral resources would occur with implementation of the proposed Project; thus, mitigation measures are not required.

### 4.12.8 References


| Cited As | Reference |
|---|---|
| CDC, n.d. | California Department of Conservation, no date. *Mineral Land Classification* (on-line map viewer). No date. Accessed June 23, 2025. Available on-line: https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc |
| GeoTek, 2021 | GeoTek, Inc. (GeoTek), 2021. *Updated Geotechnical and Infiltration Evaluation, Proposed Single-Family Residential Development, Keller Crossing Project, Northwest Corner of Winchester Road and Keller Road, Winchester Area of County of Riverside, California" (herein, "Geotechnical Update").* May 25, 2021. |
| Riverside County, 2021a | Riverside County, 2021. *Riverside County General Plan*. September 28, 2021. Accessed June 23, 2025. Available on-line at: https://planning.rctlma.org/riverside-county-general-plan |

| Cited As | Reference |
|---|---|
| Tetra Tech, 2020 | Tetra Tech, 2020. *Phase I Environmental Site Assessment, Keller Crossing, Winchester, County of Riverside, California 92596*. July 27, 2020. Included as EIR *Technical Appendix H1*. |
| Tetra Tech, 2024 | Tetra Tech, 2024. *Limited Phase II Investigation Keller Crossing Highway 79 and Keller Road Winchester, Riverside County, California 92596*. December 31, 2024. Included as EIR *Technical Appendix H2*. |

# 4.13 NOISE

This Subsection addresses the environmental issue of noise. The information in this Subsection is based in part on a technical report prepared by Urban Crossroads, Inc., titled, "Keller Crossing Specific Plan Noise Impact Analysis" (herein, "NIA"), dated May 20, 2025, and appended to this EIR as *Technical Appendix J* (Urban Crossroads, 2025d). Refer to Section 7.0*, References*, for a complete list of reference sources.

## 4.13.1 Acoustic Fundamentals

### A. Noise Definitions

Noise is simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear. Figure 4.13-1, *Typical Noise Levels,* presents a summary of the typical noise levels and their subjective loudness and effects that are described in more detail below. (Urban Crossroads, 2025d, p. 11)

### B. Range of Noise

Since the range of intensities that the human ear can detect is so large, the scale frequently used to measure intensity is a scale based on multiples of 10, the logarithmic scale. The scale for measuring intensity is the decibel scale. Each interval of 10 decibels indicates sound energy ten times greater than before, which is perceived by the human ear as being roughly twice as loud. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at three feet is roughly at 60 dBA, while loud jet engine noises equate to 110 dBA at approximately 1,000 feet, which can cause serious discomfort. Another important aspect of noise is the duration of the sound and the way it is described and distributed in time. (Urban Crossroads, 2025d, pp. 11-12)

### C. Noise Descriptors

Environmental noise descriptors are generally based on averages rather than instantaneous noise levels. The most used metric is the equivalent level ($L_{eq}$). Equivalent sound levels are not measured directly but are calculated from sound pressure levels typically measured in A-weighted decibels (dBA). The equivalent sound level ($L_{eq}$) represents a steady-state sound level containing the same total energy as a time-varying signal over a given sample period and is commonly used to describe the "average" noise levels within the environment. (Urban Crossroads, 2025d, p. 12)

Peak hour or average noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level

**Figure 4.13-1 Typical Noise Levels**

| Common Outdoor Activities | Common Indoor Activities | A-Weighted Sound Level (dBA) | Subjective Loudness | Effects of Noise |
|---|---|---|---|---|
| Threshold of Pain | | 140 | INTOLERABLE OR DEAFENING | HEARING LOSS |
| Near Jet Engine | | 130 | | |
| | | 120 | | |
| Jet Fly-Over at 300 m (1,000 ft) | Rock Band | 110 | | |
| Loud Auto Horn | | 100 | VERY NOISY | |
| Gas Lawn Mower at 1 m (3 ft) | | 90 | | |
| Diesel Truck at 15 m (50 ft), at 80 km/hr (50 mph) | Food Blender at 1m (3 ft) | 80 | | SPEECH INTERFERENCE |
| Noisy Urban Area, Daytime | Vacuum Cleaner at 3 m (10 ft) | 70 | LOUD | |
| Heavy Traffic at 90 m (300 ft) | Normal Speech at 1 m (3 ft) Large Business Office | 60 | | |
| Quiet Urban Daytime | Large Business Office | 50 | MODERATE | |
| Quiet Urban Nighttime | Theater, Large Conference Room (Background) | 40 | | SLEEP DISTURBANCE |
| Quiet Suburban Nighttime | Library | 30 | FAINT | NO EFFECT |
| Quiet Rural Nighttime | Bedroom at Night, Concert Hall (Background) | 20 | | |
| | Broadcast/Recording Studio | 10 | VERY FAINT | |
| Lowest Threshold of Human Hearing | Lowest Threshold of Human Hearing | 0 | | |

(Urban Crossroads, 2025d, Exhibit 2-A)

(CNEL), representing a composite 24-hour noise level, is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time-of-day corrections require the addition of 5 decibels to dBA $L_{eq}$ sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 decibels to dBA $L_{eq}$ sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise-sensitive time periods during the evening and night hours when noise can become more intrusive. CNEL does not represent the actual sound level heard at any time but rather represents the total sound exposure. The County of Riverside relies on the 24-hour CNEL level to assess land use compatibility with transportation-related noise sources. (Urban Crossroads, 2025d, p. 12)

## D. Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The way noise reduces with distance depends on the following factors (Urban Crossroads, 2025d, p. 12).

### *1. Geometric Spreading*

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates

outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. (Urban Crossroads, 2025d, p. 12)

#### *2. Ground Absorption*

The propagation path of noise from a highway to a receiver is usually very close to the ground. Noise attenuation from ground absorption and reflective wave canceling adds to the attenuation associated with geometric spreading. Traditionally, the excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is usually sufficiently accurate for distances of less than 200 ft. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receiver, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receiver, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance from a line source. (Urban Crossroads, 2025d, pp. 12-13)

#### *3. Atmospheric Effects*

Receivers located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors, such as air temperature, humidity, and turbulence, can also have significant effects. (Urban Crossroads, 2025d, p. 13)

#### *4. Shielding*

A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Shielding by trees and other such vegetation typically only has an "out of sight, out of mind" effect. That is, the perception of noise impact tends to decrease when vegetation blocks the line-of-sight to nearby residents. However, for vegetation to provide a substantial, or even noticeable, noise reduction, the vegetation area must be at least 15 feet in height, 100 feet wide and dense enough to completely obstruct the line-of sight between the source and the receiver. This size of vegetation may provide up to 5 dBA of noise reduction. The Federal Highway Administration (FHWA) does not consider the planting of vegetation to be a noise abatement measure. (Urban Crossroads, 2025d, p. 13)

### E. Noise Control

Noise control is the process of obtaining an acceptable noise environment for an observation point or receiver by controlling the noise source, transmission path, receiver, or all three. This concept is known as the source-path-receiver concept. In general, noise control measures can be applied to these three elements. (Urban Crossroads, 2025d, p. 13)

### F. Noise Barrier Attenuation

Effective noise barriers can reduce noise levels by 10 to 15 dBA, cutting the loudness of traffic noise in half. A noise barrier is most effective when placed close to the noise source or receiver. Noise barriers, however, do have limitations. For a noise barrier to work, it must block the line-of-sight path of sound from the noise source. (Urban Crossroads, 2025d, p. 13)

### G. Land Use Compatibility with Noise

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are more sensitive to noise intrusion than are commercial or industrial developments and related activities. As ambient noise levels affect the perceived amenity or livability of a development, so too can the mismanagement of noise impacts impair the economic health and growth potential of a community by reducing the area's desirability as a place to live, shop, and work. For this reason, land use compatibility with the noise environment is an important consideration in the planning and design process. The FHWA encourages State and Local government to regulate land development in such a way that noise-sensitive land uses are either prohibited from being located adjacent to a highway, or that the developments are planned, designed, and constructed in such a way that noise impacts are minimized. (Urban Crossroads, 2025d, p. 14)

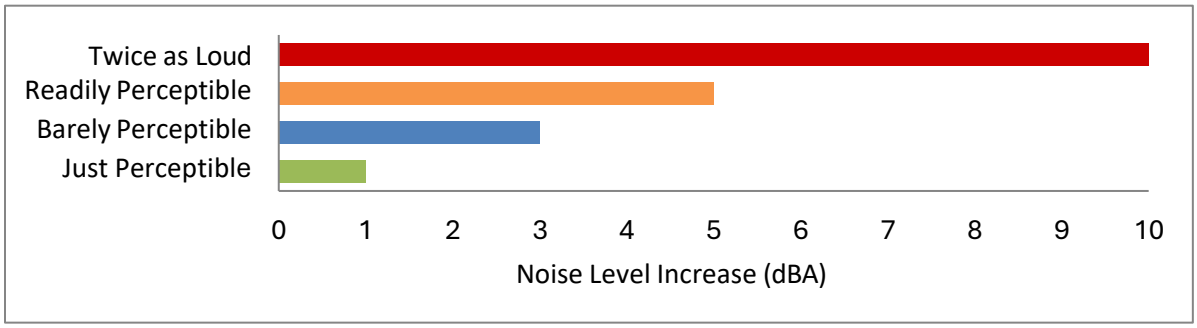
### H. Community Response to Noise

Community responses to noise may range from registering a complaint by telephone or letter, to initiating court action, depending upon everyone's susceptibility to noise and personal attitudes about noise. Several factors are related to the level of community annoyance, including:

- Fear associated with noise-producing activities;
- Socio-economic status and educational level;
- Perception that those affected are being unfairly treated;
- Attitudes regarding the usefulness of the noise-producing activity;
- Belief that the noise source can be controlled.

Approximately sixteen percent of the population has a very low tolerance for noise and will object to any noise, not of their making. Consequently, even in the quietest environment, some complaints may occur. Twenty to thirty percent of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from people exposed to any given noise environment. Surveys have shown that community response to noise varies from no reaction to vigorous action for newly introduced noises averaging from 10 dB below existing to 25 dB above existing. According to research originally published in the Noise Effects Handbook, the percentage of high annoyance ranges from approximately 0 percent at 45 dB or less, 10 percent are highly annoyed at around 60 dB and increases rapidly to approximately 70 percent being highly annoyed at approximately 85 dB or greater. Despite this variability in behavior on an individual level, the population can be expected to exhibit the responses to changes in noise levels as shown on Figure 4.13-2, *Noise Level Increase Perception*. A change of 3 dBA is considered barely perceptible, and changes of 5 dBA are considered readily perceptible. (Urban Crossroads, 2025d, p. 14)

**Figure 4.13-2 Noise Level Increase Perception**




(Urban Crossroads, 2025d, Exhibit 2-B)

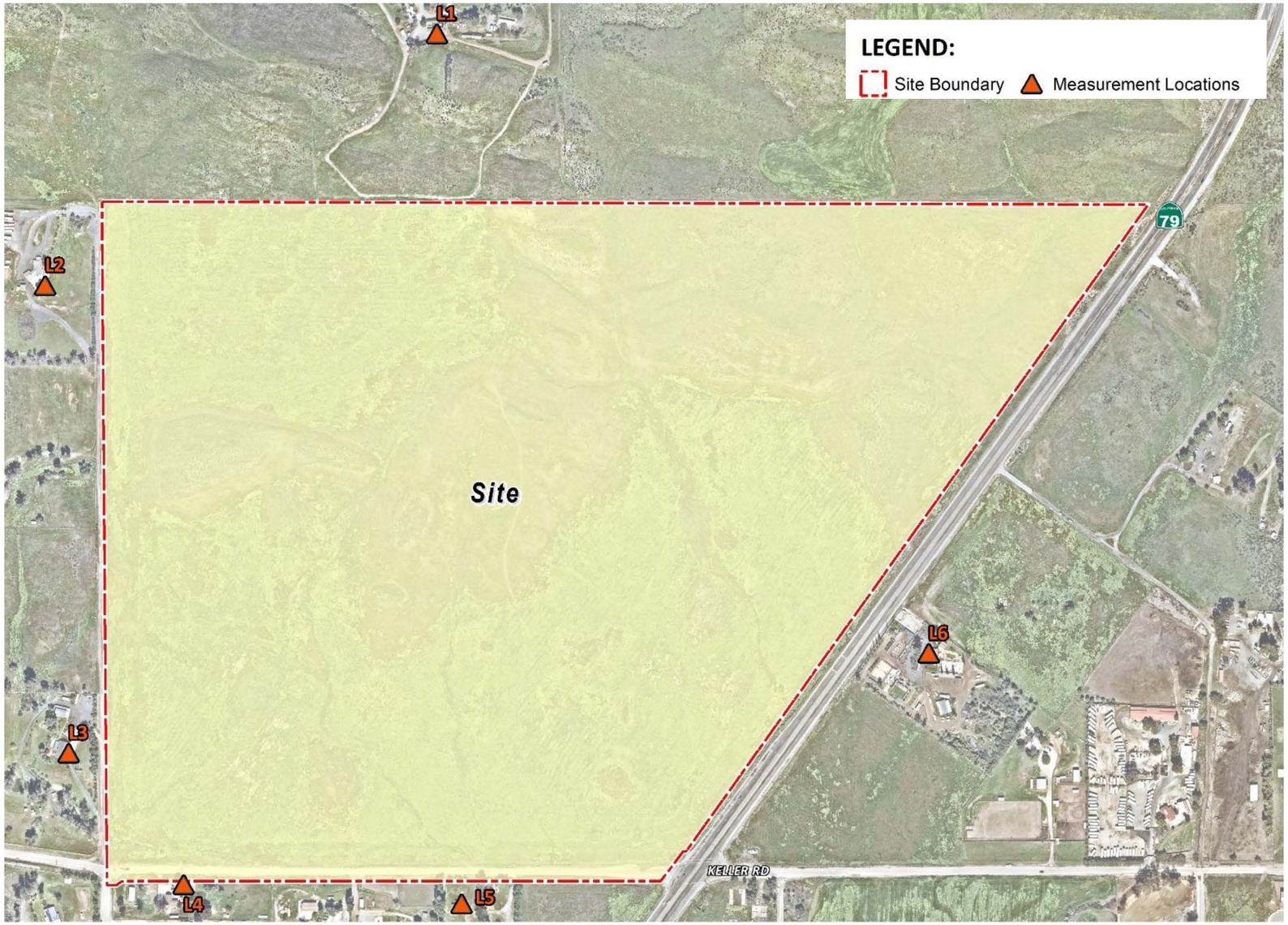
### I. Vibration

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude, often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. Decibel notation (VdB) serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment and/or activities. (Urban Crossroads, 2025d, p. 15)

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. Exhibit 2-C of the Project's NIA (*Technical Appendix J* to this EIR) illustrates common vibration sources and the human and structural response to ground-borne vibration. (Urban Crossroads, 2025d, p. 15)

## 4.13.2 Existing Conditions

To assess the existing noise level environment, 24-hour noise level measurements were taken at six locations in the Project study area. The receiver locations were selected to describe and document the existing noise environment within the Project study area. Figure 4.13-3, *Noise Measurement Locations*, provides the boundaries of the Project study area and the noise level measurement locations. To fully




Source(s): Urban Crossroads, 2025d

Figure 4.13-3

Not to Scale

Noise Measurement Locations

describe the existing noise conditions, noise level measurements were collected by Urban Crossroads, Inc. on Wednesday, September 18, 2024. (Urban Crossroads, 2025d, p. 28)

### B. Measurement Procedure and Criteria

To describe the existing noise environment, the hourly noise levels were measured during typical weekday conditions over a 24-hour period. By collecting individual hourly noise level measurements, it is possible to describe the equivalent daytime and nighttime hourly noise levels. The long-term noise readings were recorded using Piccolo Type 2 integrating sound level meter and dataloggers. The Piccolo sound level meters were calibrated using a Larson-Davis calibrator, Model CAL 150. All noise meters were programmed in "slow" mode to record noise levels in "A" weighted form. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. (Urban Crossroads, 2025d, p. 28)

### C. Noise Measurement Locations

The long-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient hourly noise levels surrounding the Project site. Both Caltrans and the FTA recognize that it is not reasonable to collect noise level measurements that can fully represent every part of a private yard, patio, deck, or balcony normally used for human activity when estimating impacts for new development projects. This is demonstrated in the Caltrans general site location guidelines which indicate that, “sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources.” Further, FTA guidance states that “it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community.” (Urban Crossroads, 2025d, p. 28)

Based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence because each receiver measurement represents a group of buildings that share acoustical equivalence. In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise sensitive areas and are used to estimate the future noise level impacts. Collecting reference ambient noise level measurements at the nearby sensitive receiver locations allows for a comparison of the before and after Project noise levels and is necessary to assess potential noise impacts due to the Project’s contribution to the ambient noise levels. (Urban Crossroads, 2025d, pp. 28-29)

### D. Noise Measurement Results

The noise measurements presented below focus on the equivalent or the hourly energy average sound levels ($L_{eq}$). The equivalent sound level ($L_{eq}$) represents a steady-state sound level containing the same total energy

**Table 4.13-1 24-Hour Ambient Noise Level Measurements**

| Location[1] | Description | Energy Average Noise Level (dBA $L_{eq}$)[2] | |
|---|---|---|---|
| | | Daytime | Nighttime |
| L1 | Located north of the site near the residence at 33250 Ashford Ln | 54.8 | 46.1 |
| L2 | Located west of the site near the residence at 33525 Pourroy Rd | 54.1 | 41.1 |
| L3 | Located west of the site near the residence at 33975 Pourroy Rd | 53.8 | 41.0 |
| L4 | Located south of the site near the residence at 32025 Keller Rd | 47.4 | 36.8 |
| L5 | Located south of the site near the residence at 32187 Keller Rd | 46.8 | 37.2 |
| L6 | Located east of the site near the retail building at 33900 Winchester Rd | 64.2 | 57.7 |

[1] See Figure 4.13-3 for the noise level measurement locations.
[2] Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2 to the Project's NIA, included as *Technical Appendix J*.
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.
(Urban Crossroads, 2025d, Table 5-1)

as a time-varying signal over a given sample period. Table 4.13-1, *24-Hour Ambient Noise Level Measurements*, identifies the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location (refer to Figure 4.13-3 for the noise measurement locations). (Urban Crossroads, 2025d, p. 29)

Table 4.13-1 provides the equivalent noise levels used to describe the daytime and nighttime ambient conditions. These daytime and nighttime energy average noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number. Appendix 5.2 of the Project's NIA (*Technical Appendix J*) provides summary worksheets of the noise levels for each of the daytime and nighttime hours. (Urban Crossroads, 2025d, p. 29)

### E. Airport-Related Noise

The Project site is not located within two miles of an airport or airstrip. The closest major airport is the French Valley Airport, located roughly 3.4 miles southwest of the Project site. According to Map FV-3 of the Airport Land Use Compatibility Plan (ALUCP) prepared for the French Valley Airport, the Project site is located approximately 3.4 miles northeast of the nearest lands that are subject to airport-related noise levels exceeding 55 dBA CNEL. (Urban Crossroads, 2025d, p. 26; RCALUC, 2012, Map FV-3)

## 4.13.3 Applicable Regulatory Requirements

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

## A. Federal Regulations

### *1. Noise Control Act of 1972*

The Noise Control Act of 1972 establishes a national policy to promote an environment for all Americans free from noise that jeopardizes their health and welfare. The Act also serves to (1) establish a means for effective coordination of Federal research and activities in noise control; (2) authorize the establishment of Federal noise emission standards for products distributed in commerce; and (3) provide information to the public respecting the noise emission and noise reduction characteristics of such products.

While primary responsibility for control of noise rests with State and local governments, Federal action is essential to deal with major noise sources in commerce, control of which require national uniformity of treatment. The Environmental Protection Agency (EPA) is directed by Congress to coordinate the programs of all Federal agencies relating to noise research and noise control.

### *2. Federal Transit Administration*

The Federal Transit Administration (FTA) has published a Noise and Vibration Impact Assessment (NVIA), which provides guidance for preparing and reviewing the noise and vibration sections of environmental documents. In the interest of promoting quality and uniformity in assessments, the manual is used by project sponsors and consultants in performing noise and vibration analyses for inclusion in environmental documents. The manual sets forth the methods and procedures for determining the level of noise and vibration impact resulting from most federally funded transit projects and for determining what can be done to mitigate such impact.

The NVIA also establishes criteria for acceptable ground-borne vibration, which are expressed in terms of root mean square (rms) velocity levels in decibels and the criteria for acceptable ground-borne noise are expressed in terms of A-weighted sound levels. As shown in Table 4.13-2, *Indoor Ground-Borne Vibration (GBV) and Ground-Borne Noise (GBN) Impact Criteria for General Vibration Assessment*, the FTA identifies three categories of land uses and provides Ground-Based Vibration (GBV) and Ground-Based Noise (GBN) criteria for each category of land use.

### *3. Federal Aviation Administration*

The Federal Aviation Administration (FAA) regulates the maximum noise level that an individual civil aircraft can emit through requiring aircraft to meet certain noise certification standards. These standards designate changes in maximum noise level requirements by "stage" designation. The standard requires that the aircraft meet or fall below designated noise levels. For civil jet aircraft, there are four stages identified, with Stage 1 being the loudest and Stage 4 being the quietest. For helicopters, two different stages exist, Stage 1 and Stage 2. As with civil jet aircraft, Stage 2 is quieter than Stage 1. In addition, the FAA is currently working to adopt the latest international standards for helicopters, which will be called Stage 3 and will be quieter than Stage 2.

**Table 4.13-2 Indoor Ground-Borne Vibration (GBV) and Ground-Borne Noise (GBN) Impact Criteria for General Vibration Assessment**

| Land Use Category | GBV Impact Levels (VdB re I micro-inch/sec) | | | GBN Impact Levels (dBA re 20 micro Pascals) | | |
|---|---|---|---|---|---|---|
| | Frequent Events | Occasional Events | Infrequent Events | Frequent Events | Occasional Events | Infrequent Events |
| **Category 1:** Buildings where vibration would interfere with interior operations. | 65 VdB | 65 VdB | 60 VdB | N/A | N/A | N/A |
| **Category 2:** Residences and buildings where people normally sleep. | 72 Vdb | 75 VdB | 80 VdB | 35 dBA | 38 dBA | 43 dBA |
| **Category 3**: Institutional land uses with primary daytime use. | 75 VdB | 78 VdB | 83 VdB | 40 dBA | 43 dBA | 48 dBA |

*This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. For equipment that is more sensitive, a Detailed Vibration Analysis must be performed.
** Vibration-sensitive equipment is generally not sensitive to ground-borne noise; however, the manufacturer's specifications should be reviewed for acoustic and vibration sensitivity

(FTA, 2018, Table 6-3)

The FAA has undertaken a phase out of older, noisier civil aircraft, resulting in some stages of aircraft no longer being in the fleet. Currently within the contiguous US, civil jet aircraft over 75,000 pounds maximum take-off weight must meet Stage 3 and Stage 4 to fly. In addition, aircraft at or under 75,000 pounds maximum take-off weight must meet Stage 2, 3, or 4 to operate within the U.S. In addition, by December 31, 2015, all civil jet aircraft, regardless of weight must meet Stage 3 or Stage 4 to fly within the contiguous U.S. Both Stage 1 and Stage 2 helicopters are allowed to fly within the U.S.

The U.S. noise standards are defined in the Code of Federal Regulations (CFR) Title 14 Part 36 – *Noise Standards: Aircraft Type and Airworthiness Certification* (14 CFR Part 36). The FAA publishes certificated noise levels in the advisory circular, *Noise Levels for U.S Certificated and Foreign Aircraft*. This advisory circular provides noise level data for aircraft certificated under 14 CFR Part 36 and categorizes aircraft into their appropriate "stages." Any aircraft that is certified for airworthiness in the U.S. needs to also comply with noise standard requirements to receive a noise certification. The purpose of the noise certification process is to ensure that the latest available safe and airworthy noise reduction technology is incorporated into aircraft design and enables the noise reductions offered by those technologies to be reflected in reductions of noise experienced by communities. As noise reduction technology matures, the FAA works with the international community to determine if a new stringent noise standard is needed. If so, the international community through the International Civil Aviation Organization (ICAO) embarks on a comprehensive analysis to determine what that new standard will be.

The current FAA noise standards applicable to new type certifications of jet and large turboprop aircraft is Stage 4. It is equivalent to the ICAO Annex 16, Volume 1 Chapter 4 standards. Recently, the international community has established and approved a more stringent standard within the ICAO Annex 16, Volume 1 Chapter 14, which became effective July 14, 2014. The FAA adopted this standard and promulgated the rule for Stage 5 effective for new type certificates after December 31, 2017 and December 31, 2020, depending on the weight of the aircraft. The Final Rule for Stage 5 was published in the Federal Register on October 4, 2017.

For helicopters, the FAA has noise standards for a Stage 3 helicopter that became effective on May 5, 2014. These more stringent standards apply to new type helicopters and are consistent with ICAO Annex 16, Volume 1 Chapter 8 and Chapter 11.

The FAA Modernization and Reform Act of 2012, in Section 513, had a prohibition on operating certain aircraft weighing 75,000 pounds or less not complying with Stage 3 noise levels, and on July 2, 2013, the FAA published a Final Rule in the Federal Register for the *Adoption of Statutory Prohibition the Operation of Jets Weighing 75,000 Pounds or Less That Are Not Stage 3 Noise Compliant*. In 1990, Congress passed the Aviation Noise and Capacity Act, which required that by the year 2000 all jet and large turboprop aircraft at civilian airports be Stage 3.

#### *4. Federal Highway Administration*

The Federal Highway Administration (FHWA) is the agency responsible for administering the Federal-aid highway program in accordance with Federal statutes and regulations. The FHWA developed the noise regulations as required by the Federal-Aid Highway Act of 1970 (Public Law 91-605, 84 Stat. 1713). The regulation, 23 CFR 772 *Procedures for Abatement of Highway Traffic Noise and Construction Noise*, applies to highway construction projects where a State department of transportation has requested Federal funding for participation in the project. The regulation requires the highway agency to investigate traffic noise impacts in areas adjacent to federally-aided highways for proposed construction of a highway on a new location or the reconstruction of an existing highway to either significantly change the horizontal or vertical alignment or increase the number of through-traffic lanes. If the highway agency identifies impacts, it must consider abatement. The highway agency must incorporate all feasible and reasonable noise abatement into the project design.

The FHWA regulations for mitigation of highway traffic noise in the planning and design of federally aided highways are contained in Title 23 of the United States Code of Federal Regulations Part 772. The regulations require the following during the planning and design of a highway project:

- Identification of traffic noise impacts;
- Examination of potential mitigation measures;
- The incorporation of reasonable and feasible noise mitigation measures into the highway project; and

- Coordination with local officials to provide helpful information on compatible land use planning and control.

The regulations contain noise abatement criteria, which represent the upper limit of acceptable highway traffic noise for different types of land uses and human activities. The regulations do not require meeting the abatement criteria in every instance. Rather, they require highway agencies make every reasonable and feasible effort to provide noise mitigation when the criteria are approached or exceeded. Compliance with the noise regulations is a prerequisite for the granting of Federal-aid highway funds for construction or reconstruction of a highway.

#### *5. Construction-Related Hearing Conservation*

The Occupational Safety and Health Administration (OSHA) hearing conservation program is designed to protect workers with significant occupational noise exposures from hearing impairment even if they are subject to such noise exposures over their entire working lifetimes. Standard 29 CFR, Part 1910 indicates the noise levels under which a hearing conservation program is required to be provided to workers exposed to high noise levels. (OSHA, 2002) This analysis does not evaluate the noise exposure of construction workers within the Project site based on CEQA requirements, and instead, evaluates the Project-related construction noise levels at the nearby sensitive receiver locations in the Project study area. Further, periodic exposure to high noise levels in short duration, such as Project construction, is typically considered an annoyance and not impactful to human health. It would take several years of exposure to high noise levels to result in hearing impairment.

### B. State Regulations

#### *1. State of California Noise Requirements*

California Health and Safety Code (HSC) Sections 46000 - 46080 states that the State is responsible for controlling, preventing, and abating noise to protect the health and welfare of its citizens. The State's policy is to provide an environment free from noise that jeopardizes health or welfare. The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a General Plan that includes a Noise Element which is to be prepared according to guidelines adopted by the Governor’s Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels.

#### *2. California Building Standards Code*

The State of California’s noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, and the California Building Standards Code. The latest version if the 2022 California Building Standards Code (Cal. Code Regs., Title 24), with an effective date of January 01, 2023. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an

exterior noise level of 60 dBA CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels.

### *3. California Assembly Bill (AB) 2496*

AB 2496 Vehicles: Exhaust Systems requires a court to require a certificate of compliance for a violation of the noise limit requirements mentioned for mufflers or exhaust systems for specified vehicles. The bill requires the court to utilize notification procedures and if a certificate of compliance is not provided to the court within three months of the violation date, the bill requires the court to treat this failure as noncompliance and inform the Department of Motor Vehicles.

This bill would also require stations providing referee functions to provide for the testing of exhaust systems of motor vehicles and the issuance of certificates of compliance for vehicles that have received a citation for installing, operating, or engaging in the business of installing a whistle-tip onto a vehicle's exhaust system and for motorcycles that have received a citation for the violations mentioned above.

### *4. California Senate Bill (SB) 1079*

SB 1079 authorizes local jurisdictions to use sound-activated enforcement devices to capture vehicle noise levels that exceed legal limits. Under California Vehicle Code, exhaust noise is limited to 95 dbA for vehicles and 80 dbA for motorcycles. However, vehicle owners can install new exhaust systems or make other vehicle modifications that change the level of sound produced by their vehicle. These illegal modifications are accessible and easily installed at any in-home garage, resulting in much louder noise disruptions than would be allowed by law.

### *5. California Department of Transportation Technical Noise Supplement*

The purpose of the Caltrans Technical Noise Supplement is to provide technical background information on transportation-related noise in general and highway traffic noise in particular. It is designed to elaborate on technical concepts and procedures referred to in the protocol. Under controlled conditions in an acoustics laboratory, the trained healthy human ear is able to discern changes in sound levels of 1 dBA when exposed to steady single-frequency (pure tone) signals in the midfrequency range. Outside such controlled conditions, the trained ear can detect changes of 2 dBA in normal environmental noise. It is widely accepted that the average healthy ear, however, can barely perceive noise level changes of 3 dBA. (Caltrans, 2013)

### *6. California Department of Transportation and Construction Vibration Guidance Manual*

The Caltrans Transportation and Construction Vibration Guidance manual provides screening tools for assessing the potential for adverse vibration effects related to human perception and structural damage. General information on the potential effects of vibration on vibration-sensitive research and advanced technology facilities is also provided. (Caltrans, 2020)

## C. Local

### *1. Riverside County General Plan Noise Element*

The County of Riverside has adopted a Noise Element of the General Plan to control and abate environmental noise, and to protect the citizens of the County of Riverside from excessive exposure to noise. The Noise Element specifies the maximum allowable exterior noise levels for new developments impacted by transportation noise sources such as arterial roads, freeways, airports, and railroads. In addition, the Noise Element identifies several polices to minimize the impacts of excessive noise levels throughout the community and establishes noise level requirements for all land uses. To protect County of Riverside residents from excessive noise, the Noise Element contains the following policies related to the Project:

*N 1.1 Protect noise-sensitive land uses from high levels of noise by restricting noise-producing land uses from these areas. If the noise-producing land use cannot be relocated, then noise buffers such as setbacks, landscaping, or block walls shall be used.*

*N 1.2 Guide noise-tolerant land uses into areas irrevocably committed to land uses that are noise-producing, such as transportation corridors or within the projected noise contours of any adjacent airports.*

*N 1.3 Consider the following uses noise-sensitive and discourage these uses in areas in excess of 65 CNEL:*

- *Schools*
- *Hospitals*
- *Rest Homes*
- *Long Term Care Facilities*
- *Mental Care Facilities*
- *Residential Uses*
- *Libraries*
- *Passive Recreation Uses*
- *Places of Worship*

*N 1.4 Determine if existing land uses will present noise compatibility issues with proposed projects by undertaking site surveys.*

*N 1.5 Prevent and mitigate the adverse impacts of excessive noise exposure on the residents, employees, visitors, and noise-sensitive uses of Riverside County.*

*N 1.7 Require proposed land uses, affected by unacceptably high noise levels, to have an acoustical specialist prepare a study of the noise problems and recommend structural and site design features that will adequately mitigate the noise problem.*

*N 2.3 Mitigate exterior and interior noises to the levels listed in Table N-2 (Table 4.13-3 below) below to the extent feasible, for stationary sources:*

**Table 4.13-3 Stationary Source Land Use Noise Standards (Residential)**

| Land Use | Interior Standards | Exterior Standards |
|---|---|---|
| *Residential* | | |
| 10:00 p.m. to 7:00 a.m. | 40 Leq (10 minute) | 45 Leq (10 minute) |
| 7:00 a.m. to 10:00 p.m. | 55 Leq (10 minute) | 65 Leq (10 minute) |

1 These are only preferred standards; final decision will be made by the Riverside County Planning Department and Office of Public Health.

*N 3.3 Ensure compatibility between industrial development and adjacent land uses. To achieve compatibility, industrial development projects may be required to include noise mitigation measures to avoid or minimize project impacts on adjacent uses.*

*N 4.1 Prohibit facility-related noise, received by any sensitive use, from exceeding the following worst-case noise levels:*

*a. 45 dBA 10-minute Leq between 10:00 p.m. and 7:00 a.m.;*
*b. 65 dBA 10-minute Leq between 7:00 a.m. and 10:00 p.m.*

*N 4.2 Develop measures to control non-transportation noise impacts.*

*N 4.3 Ensure any use determined to be a potential generator of significant stationary noise impacts be properly analyzed and ensure that the recommended mitigation measures are implemented.*

*N 4.5 Encourage major stationary noise-generating sources throughout the County of Riverside to install additional noise buffering or reduction mechanisms within their facilities to reduce noise generation levels to the lowest extent practicable prior to the renewal of conditional use permits or business license or prior to the approval and/or issuance of new conditional use permits for said facilities.*

*N 4.8 Require that the parking structures, terminals, and loading docks of commercial or industrial land uses be designed to minimize the potential noise impacts of vehicles on the site as well as on adjacent land uses.*

*N 6.3 Require commercial or industrial truck delivery hours be limited when adjacent to noise sensitive land uses unless there is no feasible alternative or there are overriding transportation benefits.*

*N 12.1 Utilize natural barrier such as hills, berms, boulders, and dense vegetation to assist in noise reduction.*

*N 13.1 Minimize the impacts of construction noise on adjacent uses within acceptable standards.*

*N 13.2 Ensure that construction activities are regulated to establish hours of operation in order to prevent and/or mitigate the generation of excessive or adverse impacts on surrounding areas.*

*N 13.3 Condition subdivision approval adjacent to developed/occupied noise-sensitive land uses (see policy N 1.3) by requiring the developer to submit a construction-related noise mitigation plan to the [County] for review and approval prior to issuance of a grading permit. The plan*

*must depict the location of construction equipment and how the noise from this equipment will be mitigated during construction of this project, through the use of such methods as:*

*i. Temporary noise attenuation fences;*
*ii. Preferential location and equipment; and*
*iii. Use of current noise suppression technology and equipment.*

*N 13.4 Require that all construction equipment utilizes noise reduction features (e.g. mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.*

*N 14.1 Enforce the California Building Standards that sets standards for building construction to mitigate interior noise levels to the tolerable 45 CNEL limit. These standards are utilized in conjunction with the Uniform Building Code by the County's Building Department to ensure that noise protection is provided to the public. Some design features may include extra-dense insulation, double-paned windows, and dense construction materials.*

*N 14.3 Incorporate acoustic site planning into the design of new development, particularly large scale, mixed-use, or master planned development, through measures which may include:*

- *Separation of noise sensitive building from noise generating sources.*
- *Use of natural topography and intervening structures to shield noise sensitive land uses.*
- *Adequate sound proofing within the receiving structure.*

*N 14.4 Consider and, when necessary, to lower noise to acceptable limits, require noise barriers and landscaped berms.*

*N 14.5 Consider the issue of adjacent residential land uses when designing and configuring all new, nonresidential development. Design and configure on site ingress and egress points that divert traffic away from nearby noise sensitive land uses to the greatest degree practicable.*

*N 14.8 Review all development applications for consistency with the standards and policies of the Noise Element of the General Plan.*

*N 16.2 Consider the following land uses sensitive to vibration:*

- Hospitals
- Residential areas
- Concert halls
- Libraries
- Sensitive research operations
- Schools
- Offices

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

To ensure noise-sensitive land uses are protected from high levels of noise, Table N-1 of the Noise Element identifies guidelines to evaluate proposed developments based on exterior and interior noise level limits for land uses and requires a noise analysis to determine needed mitigation measures if necessary. The Noise Element identifies residential uses as noise-sensitive land uses (Policy N 1.3) and discourages new development in areas with transportation-related levels of 65 dBA CNEL or greater existing ambient noise levels. To prevent and mitigate noise impacts for its residents (Policy N 1.5), County of Riverside requires exterior noise attenuation measures for sensitive land use exposed to transportation-related noise levels higher than 65 dBA CNEL. In addition, the County of Riverside had adopted an interior noise level limit of 45 dBA CNEL (Policy N 14.1). (Urban Crossroads, 2025d, p. 19)

Policy N 4.1 of the Noise Element sets a stationary-source exterior noise limit not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 dBA $L_{eq}$ for daytime hours of 7:00 a.m. to 10:00 p.m. and 45 dBA $L_{eq}$ during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m. To prevent high levels of construction noise from impacting noise-sensitive land uses, policies N 13.1 through 13.3 identify construction noise mitigation requirements for new developments located near existing noise-sensitive land uses. Policy 16.3 establishes the vibration perception threshold for rail-related vibration levels, used in this analysis as a threshold for determining potential vibration impacts due to Project construction. (Urban Crossroads, 2025d, p. 19)

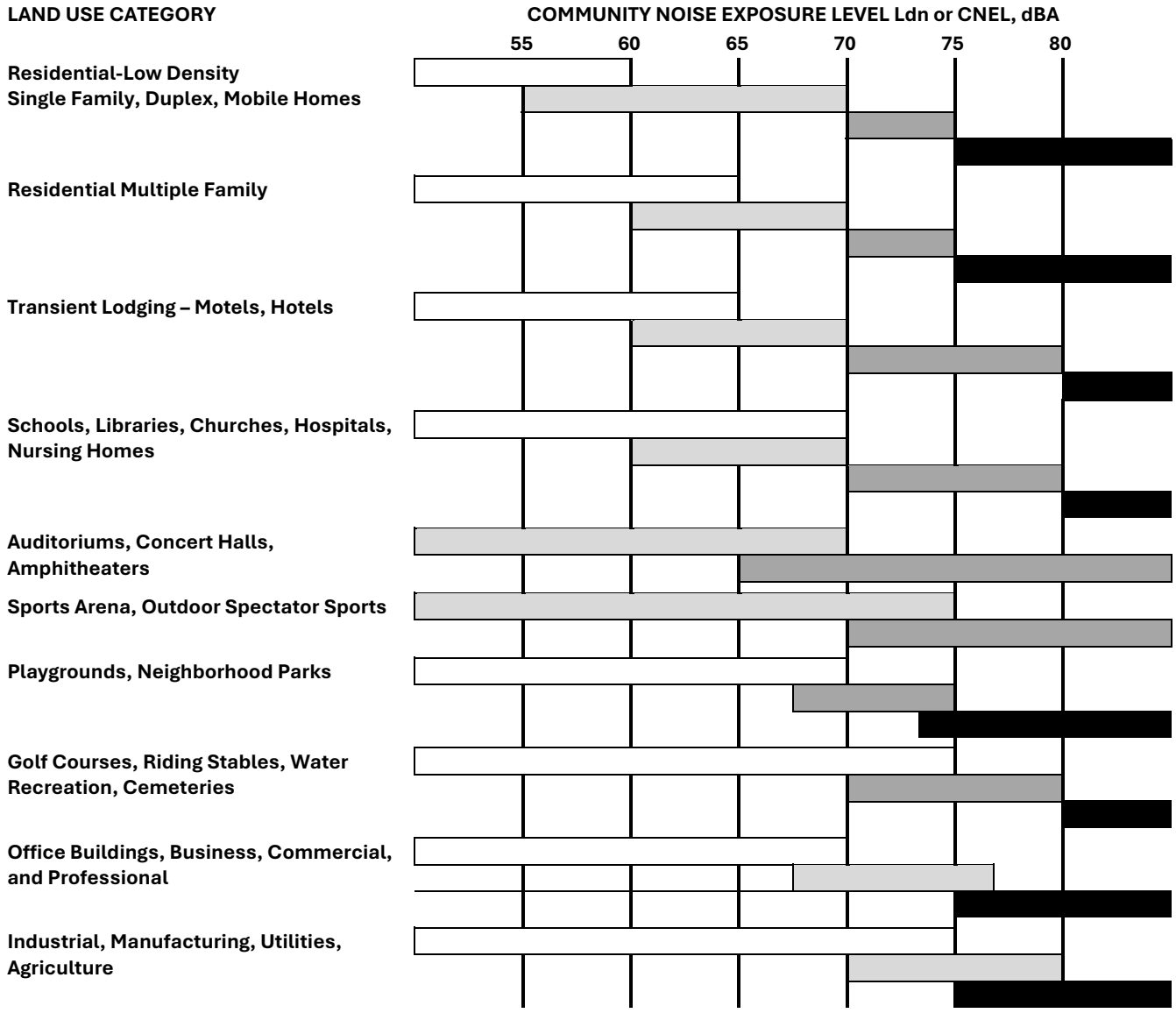
***Land Use Compatibility***

The noise criteria identified in the County of Riverside Noise Element (Table N-1) are guidelines to evaluate the land use compatibility of transportation related noise. The compatibility criteria, Table 4.13-4, *Land Use Compatibility for Community Noise Exposure*, provide the County with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels. Table 4.13-4 describes categories of compatibility and not specific noise standards. Single-family residential land uses are considered *normally acceptable* with exterior noise levels below 60 dBA CNEL, *conditionally acceptable* with exterior noise levels of up to 70 dBA CNEL, and *normally unacceptable* with exterior noise levels of up to 75 dBA CNEL. Multi-family residential land uses are considered *normally acceptable* with exterior noise levels below 65 dBA CNEL, *conditionally acceptable* with exterior noise levels of up to 70 dBA CNEL, and *normally unacceptable* with exterior noise levels of up to 75 dBA CNEL. (Urban Crossroads, 2025d, p. 19)

### *2. Construction Noise Standards*

The County of Riverside does not establish quantitative construction noise standards, instead the County has established limits to the hours of construction activities. Section 2i of Riverside County Ordinance No. 847, *Regulating Noise Section*, indicates that noise associated with any private construction activity located within one-quarter of a mile from an inhabited dwelling is considered exempt between the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May. Neither the County's General Plan nor the County Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers for CEQA analysis purposes. (Urban Crossroads, 2025d, p. 21)

## Table 4.13-4 Land Use Compatibility for Community Noise Exposure




**Legend:**

**Normally Acceptable:** Specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements

**Conditionally Acceptable:** New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. Outdoor environment will seem noisy.

**Normally Unacceptable:** New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made with needed noise insulation features included in the design. Outdoor areas must be shielded.

**Clearly Unacceptable:** New construction or development should generally not be undertaken. Construction costs to make the indoor environment acceptable would be prohibitive and the outdoor environment would not be useable.

*Source: County of Riverside General Plan Noise Element, Table N-1.*
(Urban Crossroads, 2025d, Exhibit 3-A)

Many CEQA documents prepared for Riverside County in the past relied on a less restrictive 85 dBA $L_{eq}$ construction noise level threshold adopted from the *Criteria for Recommended Standard: Occupational Noise Exposure* prepared by the National Institute for Occupational Safety and Health (NIOSH). A division of the U.S. Department of Health and Human Services, NIOSH identifies a noise level threshold based on the duration of exposure to the source. The NIOSH construction-related noise level threshold starts at 85 dBA for more than eight hours per day, and for every 3 dBA increase, the exposure time is cut in half. This results in noise level thresholds of 88 dBA for more than four hours per day, 92 dBA for more than one hour per day, 96 dBA for more than 30 minutes per day, and up to 100 dBA for more than 15 minutes per day. (Urban Crossroads, 2025d, p. 22)

To prevent long periods of exposure to high noise levels, the Occupational Safety and Health Administration (OSHA) requires hearing protection be provided by employers in workplaces where the noise levels may, endanger the hearing of their employees, such as construction equipment operators. Standard 29 CFR, Part 1910 indicates the noise levels under which a hearing conservation program is required to be provided to workers exposed to high noise levels. The Project's NIA does not evaluate the noise exposure of construction workers within the Project site based on CEQA requirements, and instead, evaluates the Project-related construction noise levels at the nearby sensitive receiver locations in the Project study area. Further, periodic exposure to high noise levels in short duration, such as Project construction, is typically considered an annoyance and not impactful to human health. It would take several years of exposure to high noise levels to result in hearing impairment. (Urban Crossroads, 2025d, p. 22)

According to Caltrans guidance, which is often cited as reference in CEQA documents, construction noise impacts shall not exceed 86 dBA $L_{max}$ at 50 feet from the job site activities between the hours of 9:00 p.m. to 6:00 a.m. Equipment and operations are usually at or less than that level, except for blasting, pile drivers (impact or vibratory), hoe rams, pavement breakers for crack-and-seat operations, and other impact equipment. The Caltrans guidance also suggests that detailed discussions of typical construction equipment noise levels are probably not necessary unless the project involves unusually sensitive receptors or nighttime work or if the project is controversial. Since this limitation is only associated with nighttime activities and does not address the noise level at the point of concern, e.g., a residence, Caltrans construction criteria was similarly not considered as the appropriate threshold for environmental review. (Urban Crossroads, 2025d, p. 22)

Further research indicated U.S. Department of Transportation guidance for construction published by the Federal Transit Administration (FTA) is appropriate and based on well documented studies of the effects of construction noise. According to the FTA *Transit Noise and Vibration Impact Assessment Manual,* local noise ordinances are typically not very useful in evaluating construction noise impacts. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessments. The FTA identifies two types of construction noise assessment criteria, general and

detailed. For general construction noise assessments, the analysis is limited to the two noisiest pieces of equipment with an hourly daytime exterior noise level threshold for residential land use of 90 dBA $L_{eq(1hr)}$. However, for long-term construction projects that would expose sensitive receivers to noise for extended periods of time, the FTA considers a daytime 8-hour average exterior construction noise level of 80 dBA $L_{eq(8hr)}$. The absolute FTA thresholds are intended to account for reasonable expectations regarding construction noise during the daytime hours and are intended to protect human health. (Urban Crossroads, 2025d, pp. 22-23)

Therefore, to evaluate whether the Project will generate potentially significant short-term noise levels at nearby noise sensitive residential receiver locations, a daytime exterior construction noise level of 80 dBA $L_{eq}$ is used as a reasonable threshold to assess construction noise level impacts based on the FTA detailed analysis construction noise criteria with a nighttime exterior construction noise level of 70 dBA $L_{eq}$. (Urban Crossroads, 2025d, p. 23)

### *3. Construction Vibration Standards*

Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures, and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment such as air compressors, light trucks, hydraulic loaders, etc., generates little or no ground vibration. To analyze vibration impacts originating from the operation and construction of the proposed Project, vibration-generating activities are appropriately evaluated against standards established under the Municipal Code if such standards exist. However, the County of Riverside does not identify specific construction vibration level limits. Therefore, for analysis purposes, the Caltrans *Transportation and Construction Vibration Guidance Manual*, Table 19, vibration damage are used in this noise study to assess potential temporary construction-related impacts at adjacent building locations. The nearest noise sensitive buildings adjacent to the Project site can best be described as “older residential structures” with a maximum acceptable continuous vibration threshold of 0.30 PPV (in/sec). (Urban Crossroads, 2025d, p. 23)

### *4. Operational Noise Standards*

The County of Riverside has set hourly average $L_{eq}$ exterior noise limits to control the stationary source associated with land development. The County considers noise generated using motor vehicles to be a stationary noise source when operated on private property, such as at a loading dock. These facility-related noises, as projected to any portion of any surrounding property containing a *habitable dwelling, hospital, school, library, or nursing home*, must not exceed the following worst-case noise levels. Policy N 4.1 of the County of Riverside General Plan Noise Element sets a stationary-source average $L_{eq}$ exterior noise limit not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 dBA $L_{eq}$ for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA $L_{eq}$ during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m. (Urban Crossroads, 2025d, p. 21)

The County of Riverside Code Section 9.52.040 *General sound level standards* identify lower, more restrictive exterior noise level standards, which for the purpose of this report, are used to evaluate potential

Project-related operational noise level limits instead of the higher the General Plan exterior noise level standards previously identified. The County of Riverside Municipal Code identifies exterior noise level limits of 55 dBA $L_{eq}$ during the daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA $L_{eq}$ during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m. for noise-sensitive uses. The County of Riverside Municipal Code Noise Section is included in Appendix 3.1 to the Project's NIA (*Technical Appendix J*). (Urban Crossroads, 2025d, p. 21)

Based on several discussions with the County of Riverside Department of Environmental Health (DEH), Office of Industrial Hygiene (OIH), it is important to recognize that the County of Riverside Municipal Code noise level standards incorrectly identify maximum noise level ($L_{max}$) standards that should instead reflect the average $L_{eq}$ noise levels. Moreover, the County of Riverside DEH OIH's April 15th, 2015 *Requirements for determining and mitigating, non-transportation noise source impacts to residential properties* also identifies operational (stationary-source) noise level limits using the $L_{eq}$ metric, consistent with the direction of the County of Riverside General Plan guidelines and standards provided in the Noise Element. Therefore, the Project's NIA (*Technical Appendix J*) has been prepared consistent with the direction of the County of Riverside DEH OIH guidelines and standards using the average $L_{eq}$ noise level metric for stationary-source (operational) noise level evaluation. (Urban Crossroads, 2025d, p. 21)

### 4.13.4 Basis for Determining Significance

#### A. Significance Thresholds

According to Section XIII of the CEQA Guidelines, the proposed Project would result in a significant impact to noise if the Project or any Project-related component would:

- Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- Result in the generation of excessive groundborne vibration or noise levels?
- For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The following thresholds are derived from Riverside County's Environmental Assessment Checklist, are based on the 2018 updates to the State CEQA Guidelines, and are used to evaluate the significance of impacts due to noise:

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

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

c. *Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?*

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

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

### B. Noise Level Increases

Noise level increases resulting from the Project are evaluated based on the Appendix G to the State CEQA Guidelines. Under CEQA, consideration must be given to the magnitude of the increase, the existing baseline ambient noise levels, and the location of receivers to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes that there is no single noise increase that renders the noise impact significant. This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will typically be judged. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted – the so-called ambient environment. The ambient noise level is the composite of noise from all sources, excluding the alleged offensive noise. In this context, it represents the normal or existing level of environmental noise at a given location for a specified time of day or night. (Urban Crossroads, 2025d, p. 24)

#### *1. Transportation Noise (Substantial Permanent Noise Level Increase)*

Noise level increases resulting from the Project are evaluated based on the Appendix G CEQA Guidelines. Under CEQA, consideration must be given to the magnitude of the increase, the existing baseline ambient noise levels, and the location of receivers to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes that there is no single noise increase that renders the noise impact significant. This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted—the so-called ambient environment. (Urban Crossroads, 2025d, p. 24)

#### *2. Noise-Sensitive Receivers(Substantial Permanent Noise Level Increase)*

The Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of project-generated increases in noise levels that consider the ambient noise level. The FICON

recommendations are based on studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average-daily noise level (CNEL) and equivalent continuous noise level (Leq). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will typically be judged. (Urban Crossroads, 2025d, pp. 24-25)

The approach used herein recognizes that there is no single noise increase that renders a noise impact significant, based on a 2008 California Court of Appeal ruling on *Gray v. County of Madera*. For example, if the ambient noise environment is quiet (<60 dBA) and the new noise source greatly increases the noise levels, an impact may occur if the noise criteria may be exceeded. Therefore, for this analysis, a readily perceptible 5 dBA or greater project-related noise level increase is considered a significant impact when the without project noise levels are below 60 dBA. Per the FICON, in areas where the without project noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase appears to be appropriate for most people. When the without project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance. (Urban Crossroads, 2025d, p. 25)

The FICON guidance provides an established source of criteria to assess the impacts of substantial temporary or permanent increase in baseline ambient noise levels. Based on the FICON criteria, the amount to which a given noise level increase is considered acceptable is reduced when the without Project (baseline) noise levels are already shown to exceed certain land-use specific exterior noise level criteria. The specific levels are based on typical responses to noise level increases of 5 dBA or readily perceptible, 3 dBA or barely perceptible, and 1.5 dBA depending on the underlying without Project noise levels for noise-sensitive uses. These levels of increases and their perceived acceptance are consistent with guidance provided by both the Federal Highway Administration and Caltrans. (Urban Crossroads, 2025d, p. 25)

### *3. Construction Noise (Substantial Temporary Noise Level Increase*

To control the noise-generating construction activities, the temporary noise level increases over the existing ambient conditions must be considered. Therefore, the Caltrans Traffic Noise Analysis Protocol 12 dBA Leq substantial noise level increase threshold is used herein to assess temporary noise level increases. In California a substantial noise increase is considered to occur when the project's predicted noise level exceeds the existing noise level by 12 dBA or more. The use of 12 dB was established in California many years ago and is based on the concept that a 10 dB increase generally is perceived as a doubling of loudness. Therefore, if the Project-related construction noise levels generate a temporary noise level increase above the existing ambient noise levels of up to 12 dBA Leq, then the Project construction noise level increases would be considered a potentially significant impact. (Urban Crossroads, 2025d, p. 25)

### C. Vibration

Vibration-generating activities are evaluated using standards established by the Caltrans *Transportation and Construction Vibration Guidance Manual*, Table 19. The Caltrans' vibration thresholds for building damage are used in this noise study to assess potential operational and temporary construction-related impacts at adjacent building locations. A maximum acceptable continuous vibration threshold of 0.30 PPV (in/sec) is used to describe the nearest residential buildings adjacent to the Project site. (Urban Crossroads, 2025d, p. 26)

### D. Significance Criteria Summary

Table 4.13-5, *Significance Criteria Summary,* provides a summary of noise impacts that shall be considered significant if any of the following occur as a direct result of the development. Table 4.13-5 shows the significance criteria summary matrix that includes the allowable criteria used to identify potentially significant incremental noise level increases.

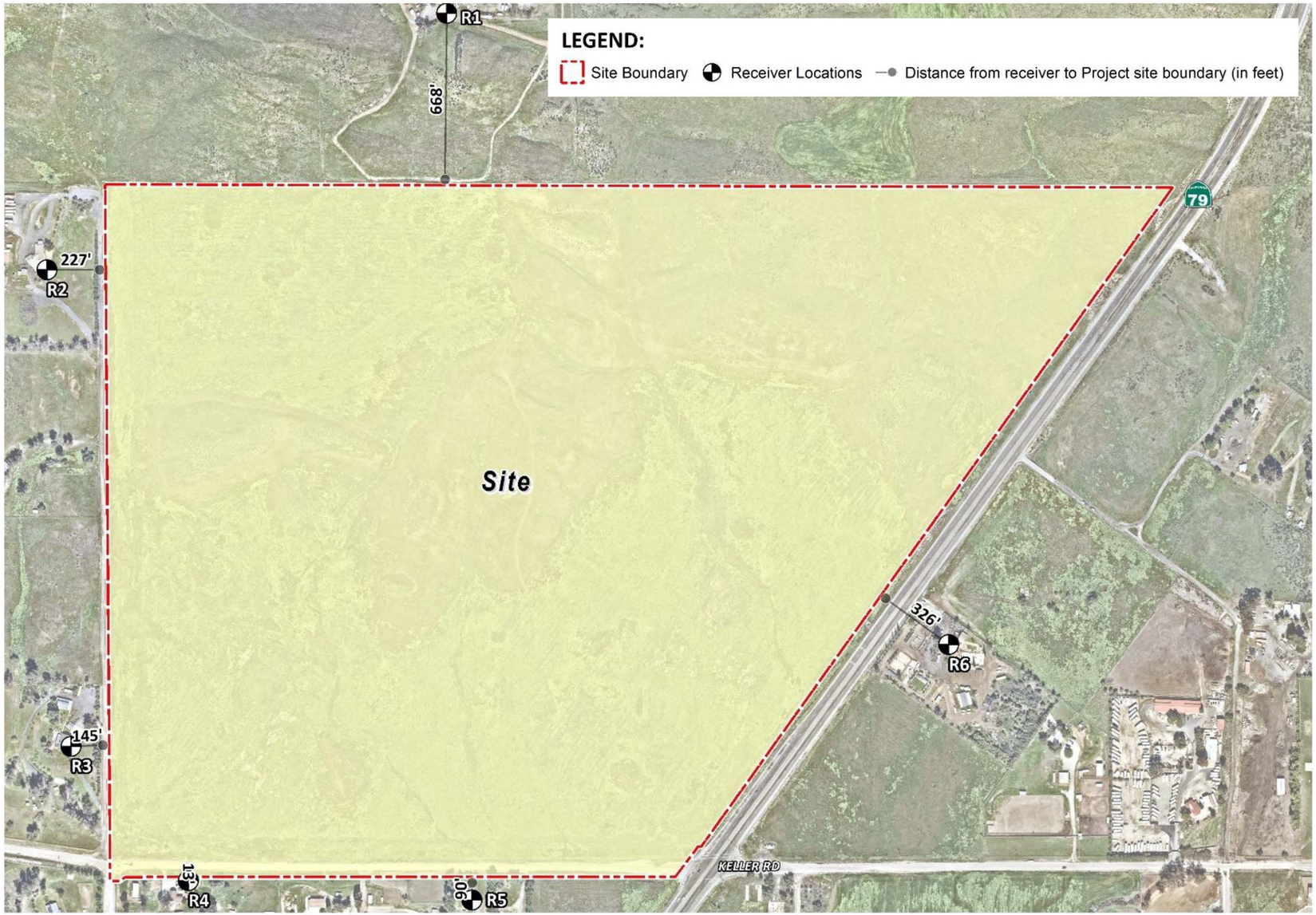
## 4.13.5 Methodology for Calculating Project-Related Noise Impacts

### A. Noise-Sensitive Receptors

To assess the potential for long-term operational and short-term construction noise impacts, the following sensitive receiver locations, as shown in Figure 4.13-4, *Receiver Locations*, were identified as representative locations for analysis. Sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, out-patient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals. (Urban Crossroads, 2025d, p. 53)

To describe the potential off-site Project noise levels, six receiver locations in the vicinity of the Project site were identified. All distances are measured from the Project site boundary to the outdoor living areas (e.g., private backyards) or at the building façade, whichever is closer to the Project site. The selection of receiver locations is based on FHWA guidelines and is consistent with additional guidance provided by Caltrans and the FTA. Other sensitive land uses in the Project study area that are located at greater distances than those identified in this noise study will experience lower noise levels than those presented herein due to the additional attenuation from distance and the shielding of intervening structures. Distance is measured in a straight line from the project boundary to each receiver location. (Urban Crossroads, 2025d, p. 53)

R1: Location R1 represents the existing noise sensitive residence at 33250 Ashford Lane, approximately 668 feet north of the Project site. Since there are no private outdoor living areas




Source(s): Urban Crossroads, 2025d

Figure 4.13-4

Not to Scale

Receiver Locations

**Table 4.13-5 Significance Criteria Summary**

| Analysis | Condition(s) | Significance Criteria | |
|---|---|---|---|
| | | Daytime | Nighttime |
| Off-Site Traffic[1] | If ambient is < 60 dBA CNEL | ≥ 5 dBA CNEL Project increase | |
| | If ambient is 60 - 65 dBA CNEL | ≥ 3 dBA CNEL Project increase | |
| | If ambient is > 65 dBA CNEL | ≥ 1.5 dBA CNEL Project increase | |
| On-Site Traffic[2] | Exterior Noise Level Criteria | 65 dBA CNEL | |
| | Interior Noise Level Standard | 45 dBA CNEL | |
| Operational | Exterior Noise Level Standards[3] | 55 dBA $L_{eq}$ | 45 dBA $L_{eq}$ |
| | If ambient is < 60 dBA Leq[1] | ≥ 5 dBA $L_{eq}$ Project increase | |
| | If ambient is 60 - 65 dBA Leq[1] | ≥ 3 dBA $L_{eq}$ Project increase | |
| | If ambient is > 65 dBA Leq[1] | ≥ 1.5 dBA $L_{eq}$ Project increase | |
| Construction | Noise Level Threshold[4] | 80 dBA $L_{eq}$ | |
| | Noise Level Increase | 20 dBA $L_{eq}$ | |
| | Vibration Level Threshold[5] | 0.30 PPV (in/sec) | |

[1] FICON, 1992.
[2] County of Riverside General Plan Noise Element.
[3] County of Riverside General Plan Municipal Code, Section 9.52.040.
[4] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.
[5] County of Riverside General Plan Noise Element, Policy N 16.3.
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.
(Urban Crossroads, 2025d, Table 4-1)

(backyards) facing the Project site, receiver R1 is placed at the residential building façade. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.

R2: Location R2 represents the existing noise sensitive residence at 33525 Pourroy Road, approximately 227 feet west of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R2 is placed at the residential building façade. A 24-hour noise measurement was taken near this location, L2, to describe the existing ambient noise environment.

R3: Location R3 represents the existing noise sensitive residence at 33975 Pourroy Road, approximately 145 feet west of the Project site. R3 is placed at the private outdoor living areas (backyard) facing the Project site. A 24-hour noise measurement near this location, L3, is used to describe the existing ambient noise environment. R4: Location R4 represents the existing noise sensitive residence at 32025 Keller Road, approximately 13 feet south of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R4 is placed at the residential building façade. A 24-hour noise measurement near this location, L4, is used to describe the existing ambient noise environment.

R5: Location R5 represents the existing noise sensitive residence at 32187 Keller Road, approximately 90 feet south of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R5 is placed at the residential building façade. A 24-

hour noise measurement near this location, L5, is used to describe the existing ambient noise environment.

R6: Location R6 represents the existing noise sensitive residence at 33900 Winchester Road, approximately 326 feet east of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R6 is placed at the residential building façade. A 24-hour noise measurement was taken near this location, L6, to describe the existing ambient noise environment.

## B. Construction Noise Methodology

### *1. Typical Construction Reference Noise Levels*

The FTA *Transit Noise and Vibration Impact Assessment Manual* recognizes that construction projects are accomplished in several different stages and outlines the procedures for assessing noise impacts during construction. Each stage of construction has a specific equipment mix, depending on the work to be completed during that stage. As a result of the equipment mix, each stage has its own noise characteristics; some stages have higher continuous noise levels than others, and some have higher impact noise levels than others. The Project construction activities are expected to occur in the following stages: site preparation, grading, building construction, paving, and architectural coating. (Urban Crossroads, 2025d, p. 65)

To describe peak construction noise activities, the construction noise analysis was prepared using reference noise level measurements published in the Update of Noise Database for Prediction of Noise on Construction and Open Sites by the Department for Environment, Food and Rural Affairs (DEFRA). The DEFRA database provides the most recent and comprehensive source of reference construction noise levels. Table 4.13-7, *Construction Reference Noise Levels,* provides a summary of the DEFRA construction reference noise level measurements expressed in hourly average dBA Leq using the estimated FHWA Roadway Construction Noise Model (RCNM) usage factors to describe the typical construction activities for each stage of Project construction. (Urban Crossroads, 2025d, p. 65)

### *2. Construction Vibration Assessment Methodology*

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures, and soil type. It is expected that ground-borne vibration from the Project construction activities would cause only intermittent, localized intrusion. Ground-borne vibration levels resulting from typical construction activities occurring within the Project site were estimated by data published by the Federal Transit Administration (FTA). However, while vehicular traffic is rarely perceptible, construction has the potential to result in varying degrees of temporary ground vibration, depending on the specific construction activities and equipment used. Ground vibration levels associated with various types of construction equipment are summarized in Table 4.13-6, *Vibration Source Levels for Construction Equipment*. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential Project construction vibration levels using the following vibration assessment methods defined by Caltrans. To describe the human response (annoyance)

associated with vibration impacts, Caltrans provides the following equation: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.1}$ (Urban Crossroads, 2025d, p. 74)

## C. Operational Noise Methodology

### *1. Operational Noise Sources*

The operational noise analysis provided herein is intended to describe noise level impacts associated with the expected typical daytime and nighttime residential activities at the Project site. The operational noise sources of concern would be the air conditioning units associated with each dwelling unit are evaluated against standards established in the Riverside County Ordinance No. 847 (Regulating Noise), and the relative increase in noise levels at each existing sensitive receiver. (Urban Crossroads, 2025d, p. 57)

### *2. Reference Noise Levels*

To estimate the Project operational noise impacts, reference noise level measurements were collected from similar types of activities or taken from manufactures' specification sheets to represent the noise levels expected with the development of the Project. A detailed description of the reference noise levels is shown in Table 10-1 and in Subsection 10.2 of the Project's NIA (*Technical Appendix J*), and were used to estimate the Project's operational noise impacts. It is important to note that the projected noise levels assume the worst-case noise environment with the air conditioning units, trash enclosure activities, and parking lot vehicle movements all operating at the same time. These sources of noise activity will likely vary throughout

**Table 4.13-6 Vibration Source Levels for Construction Equipment**

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

Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual
(Urban Crossroads, 2025d, Table 11-7)

the day. Refer to Subsection 10.2 of the Project's NIA for a discussion of measurement procedures and reference noise measurements used for establishing reference noise levels. (Urban Crossroads, 2025d, p. 57)

### *3. CadnaA Noise Prediction Model*

To fully describe the exterior operational noise levels from the Project, Urban Crossroads developed a noise prediction model using the CadnaA (Computer Aided Noise Abatement) computer program. CadnaA can analyze multiple types of noise sources using the spatially accurate Project site plan, georeferenced Nearmap aerial imagery, topography, buildings, and barriers in its calculations to predict outdoor noise

**Table 4.13-7 Construction Reference Noise Levels**

| Phase | Construction Stage | Equipment Type[1] | Quantity | Reference Noise Level @ 50 Feet (dBA Leq) | Combined Noise Level by Type @ 50 Feet (dBA $L_{eq}$) | Combined Reference Noise Level by Stage @ 50 feet (dBA $L_{eq}$) | Reference Power Level (dBA $L_w$) |
|---|---|---|---|---|---|---|---|
| Off-Site Utilities and Roadway | Grading | Scraper | 4 | 80.0 | 86.0 | 86.7 | 118.4 |
| | | Rubber Tired Dozers | 1 | 78.0 | 78.0 | | |
| | | Water Truck | 1 | 70.0 | 70.0 | | |
| | Sewer, Drain, Water | Excavators | 2 | 77.0 | 80.0 | 82.4 | 114.0 |
| | | Rubber Tires Loaders | 2 | 75.0 | 78.0 | | |
| | | Water Truck | 1 | 70.0 | 70.0 | | |
| | Utility Crossing | Tractors/Loaders/ Backhoes | 2 | 74.0 | 77.0 | 77.8 | 109.4 |
| | | Water Truck | 1 | 70.0 | 70.0 | | |
| | Dry Utilities | Tractors/Loaders/ Backhoes | 2 | 74.0 | 77.0 | 77.8 | 109.4 |
| | | Water Truck | 1 | 70.0 | 70.0 | | |
| | Curb, Gutter, Street Improvement | Grader | 1 | 81.0 | 81.0 | 85.6 | 117.2 |
| | | Skid Steer Loader | 1 | 74.0 | 74.0 | | |
| | | Scraper | 1 | 80.0 | 80.0 | | |
| | | Water Truck | 1 | 70.0 | 70.0 | | |
| In-Tract Utilities | Sewer, Drain, Water | Excavators | 2 | 77.0 | 80.0 | 83.9 | 115.6 |
| | | Rubber Tires Loaders | 2 | 78.0 | 81.0 | | |
| | | Water Truck | 2 | 70.0 | 73.0 | | |
| | Utility Sleeving | Tractors/Loaders/ Backhoes | 2 | 74.0 | 77.0 | 78.5 | 110.1 |
| | | Water Truck | 2 | 70.0 | 73.0 | | |
| | Curb, Gutter, Street Improvement | Grader | 1 | 81.0 | 81.0 | 82.1 | 113.7 |
| | | Skid Steer Loader | 1 | 74.0 | 74.0 | | |
| | | Water Truck | 1 | 70.0 | 70.0 | | |
| | Dry Utilities | Tractors/Loaders/ Backhoes | 2 | 74.0 | 77.0 | 77.8 | 109.4 |
| | | Water Truck | 1 | 70.0 | 70.0 | | |
| Phase 1 | Grading | Scrapers | 8 | 80.0 | 89.0 | 90.6 | 122.2 |
| | | Rubber Tired Dozers | 5 | 78.0 | 85.0 | | |
| | | Water Truck | 2 | 70.0 | 73.0 | | |
| | Building Construction | Cranes | 1 | 73.0 | 73.0 | 86.3 | 117.9 |
| | | Forklifts | 3 | 79.0 | 83.8 | | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | Generator Sets | 1 | 79.0 | 79.0 | | |
| | | Tractors/Loaders/ Backhoes | 3 | 74.0 | 78.8 | | |
| | | Welders | 1 | 70.0 | 70.0 | | |
| | Paving | Pavers | 2 | 74.0 | 77.0 | 81.5 | 113.1 |
| | | Paving Equipment | 2 | 74.0 | 77.0 | | |
| | | Rollers | 2 | 73.0 | 76.0 | | |
| | Architectural Coating | Air Compressors | 1 | 80.0 | 80.0 | 80.0 | 111.6 |
| Phase 2 | Building Construction | Cranes | 1 | 73.0 | 73.0 | 86.3 | 117.9 |
| | | Forklifts | 3 | 79.0 | 83.8 | | |
| | | Generator Sets | 1 | 79.0 | 79.0 | | |
| | | Tractors/Loaders/ | 3 | 74.0 | 78.8 | | |
| | | Welders | 1 | 70.0 | 70.0 | | |
| | Paving | Pavers | 2 | 74.0 | 77.0 | 81.5 | 113.1 |
| | | Paving Equipment | 2 | 74.0 | 77.0 | | |
| | | Rollers | 2 | 73.0 | 76.0 | | |
| | Architectural Coating | Air Compressors | 1 | 80.0 | 80.0 | 80.0 | 111.6 |

Based on the Keller Crossing Air Quality Analysis, Urban Crossroads, 2026.
(Urban Crossroads, 2025d, Table 11-1)

levels. (Urban Crossroads, 2025d, pp. 59-60)

Using the ISO 9613-2 protocol, CadnaA will calculate the distance from each noise source to the noise receiver locations, using the ground absorption, distance, and barrier/building attenuation inputs to provide a summary of noise level at each receiver and the partial noise level contributions by noise source. Consistent with the ISO 9613-2 protocol, the CadnaA noise prediction model relies on the reference sound power level (Lw) to describe individual noise sources. While sound pressure levels (e.g., Leq) quantify in decibels the intensity of given sound sources at a reference distance, sound power levels (Lw) are connected to the sound source and are independent of distance. Sound pressure levels vary substantially with distance from the source and diminish because of intervening obstacles and barriers, air absorption, wind, and other factors. Sound power is the acoustical energy emitted by the sound source and is an absolute value that is not affected by the environment. (Urban Crossroads, 2025d, p. 60)

## D. Off-Site Traffic Modeling Methodology

### *1. Federal Highway Administration Traffic Noise Prediction Model*

The expected roadway noise level increases from vehicular traffic were calculated by Urban Crossroads, Inc. using a computer program that replicates the Federal Highway Administration (FHWA) Traffic Noise Prediction Model- FHWA-RD-77-108. The FHWA Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). In California, the national REMELs are substituted with the California Vehicle Noise (Calveno) Emission Levels. Adjustments are then made to the REMEL to account for: the roadway classification (e.g., collector, secondary, major, or arterial), the roadway active width (i.e., the distance between the center of the outermost travel lanes on each side of the roadway), the total average daily traffic (ADT), the travel speed, the percentages of automobiles, medium trucks, and heavy trucks in the traffic volume, the roadway grade, the angle of view (e.g., whether the roadway view is blocked), the site conditions ("hard" or "soft" relates to the absorption of the ground, pavement, or landscaping), and the percentage of total ADT which flows each hour throughout a 24-hour period. Research conducted by Caltrans has shown that the use of soft site conditions is appropriate for the application of the FHWA traffic noise prediction model used in this analysis. This methodology is consistent with the County of Riverside Office of Industrial Hygiene *Requirements for Determining and Mitigating Traffic Noise Impacts to Residential Structures*, which specifically requires the FHWA RD-77-108 model to be used in analysis within the County's jurisdiction. (Urban Crossroads, 2025d, p. 31)

### *2. Off-Site Traffic Noise Prediction Model Inputs*

Table 6-1 of the Project's NIA (*Technical Appendix J*) presents the roadway parameters used to assess the Project's off-site transportation noise impacts. Table 6-1 identifies the 25 off-site study area roadway segments, the distance from the centerline to adjacent receiving land use based on the functional roadway classifications per the County of Riverside General Plan Circulation Element and the vehicle speeds. The ADT volumes used in this study are presented in Table 6-2 of the Project's NIA are based on the Project's Traffic Analysis ("TA"; *Technical Appendix L2* to this EIR), and are based on the following traffic scenarios (Urban Crossroads, 2025d, p. 31):

1. Existing (2024) Conditions Without Project
2. Existing (2024) Conditions With Project (Project Buildout)
3. Existing plus Ambient Growth plus Cumulative (EAC) (2030) Without Project
4. Existing plus Ambient Growth plus Cumulative (EAC) (2030) With Project (Project Buildout)

The ADT volumes vary for each roadway segment based on the existing traffic volumes and the combination of project traffic distributions. In addition, the off-site traffic noise analysis maintains a peak hour to average daily traffic (peak-to-daily) relationship of approximately 8.08%. The *County of Riverside General Plan Noise Element* requires that future on-site traffic noise impacts be assessed using the maximum capacity design standard for highways and major roads. However, analysis herein relies on a comparative analysis of the off-site traffic noise impacts, without and with project ADT traffic volumes from the Project's TA (*Technical Appendix L2* to this EIR). The use of the maximum capacity design standards is typically reserved for determining the future long-range on-site traffic noise impacts, not the comparative contributions associated with the off-site Project traffic noise level impacts. (Urban Crossroads, 2025d, p. 34)

Table 6-3 of the Project's NIA (*Technical Appendix J* to this EIR) provides the time of day (daytime, evening, and nighttime) vehicle splits and Table 6-4 of the Project's NIA (*Technical Appendix J* to this EIR) presents the traffic flow distributions (vehicle mix) used for this analysis. The vehicle mix provides the hourly distribution percentages of automobile, medium trucks, and heavy trucks for input into the FHWA noise prediction model. (Urban Crossroads, 2025d, p. 34)

### *3. On-Site Traffic Noise Prediction Model Inputs*

Table 6-5 of the Project's NIA (*Technical Appendix J* to this EIR) presents the on-site roadway parameters, including the ADT volumes used for this study. The on-site roadway parameters are based on the County of Riverside General Plan Circulation Element roadway classifications, which are consistent with the County of Riverside office of Industrial Hygiene guidance: *Requirements for Determining and Mitigating Traffic Noise Impacts to Residential Structures*. (Urban Crossroads, 2025d, p. 35)

The maximum two-way traffic volumes at a level of service C, shown in Table 6-5 of the Project's NIA (*Technical Appendix J* to this EIR), were obtained from Figure C-3 of the 2008 County of Riverside General Plan Circulation Element and reflect future long-range traffic conditions needed to assess the on-site traffic noise environment and to identify the appropriate noise mitigation measures that address the worst-case future noise conditions. Consistent with the County of Riverside Office of Industrial Hygiene noise study requirements, hard site conditions were used to analyze the potential on-site traffic noise impacts for the Project study area. Hard site conditions account for the sound propagation loss over a reflective surface between the source and the receiver. (Urban Crossroads, 2025d, p. 35)

### 4.13.6 Impact Analysis

| | |
|---|---|
| **Threshold a.:** | **Would the Project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?** |
| **Threshold b.:** | **For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?** |

The Project does not include an airport-related component, and the Project has no potential to contribute to or cause increased airport-related noise in the local area; thus, no direct impact would occur. There are no public airports located within two miles of the Project site. The closest public airport is the French Valley Airport located roughly 3.4 miles southwest of the Project site. According to Map FV-2 of the Riverside County Airport Land Use Compatibility Plan Policy Document, the Project site is located approximately 3.4 miles northeast of the nearest lands that are subject to airport-related noise levels exceeding 55 dBA CNEL (RCALUC, 2012, Map FV-3). According to the French Valley Airport ALUCP, noise levels below 55 dBA CNEL are considered "clearly acceptable" for single family residential, multifamily residential, and recreational land uses pursuant. Because the Project site would not be exposed to airport-related noise levels exceeding 55 dBA CNEL, the Project would not expose people residing or working in the area to excessive noise levels associated with operations at the French Valley Airport, and impacts would be less than significant. (RCALUC, 2004, Map FV-2; Google Earth, 2025)

The nearest private airstrip to the Project site is the Pines Airpark, located approximately 0.9-mile northwest of the Project site. However, the Conditional Use Permit (CUP) for the Pines Airpark (CUP 3078 Revision No. 3) was withdrawn on November 15, 2016, and the previously-approved CUP was allowed to expire (Riverside County, 2016). As such, the Pines Airpark is no longer in operation. There are no other private airstrips within the Project vicinity (Google Earth, 2025). Accordingly, the Project would not expose people residing or working in the area to excessive noise levels associated with private airstrips, and no impact would occur.

| | |
|---|---|
| **Threshold c.:** | **Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?** |

The Project has the potential to result in substantial temporary or periodic noise impacts during Project construction, and has the potential to result in permanent increases in ambient noise levels associated with site operations as well as from Project-related traffic. Each is discussed below.

#### A. Construction Noise Impacts

Following is an analysis of the potential average dBA Leq impacts resulting from short-term construction activities associated with the development of the Project. Exhibit 11-A of the Project's NIA (*Technical Appendix J*) shows the construction noise source locations in relation to the nearest sensitive receiver locations previously depicted on Figure 4.13-4.

### *1. Construction Noise Analysis*

Construction projects involve various stages, and activities frequently shift from one location to another. For example, during site preparation and grading, noise-generating activities may concentrate in an area for a short period to remove an obstruction, while the majority of the grading involves the equipment moving back and forth in a predictable pattern throughout the site; building construction and foundation work generally concentrate near the building footprint, while paving generally involves a predictable pattern of movement throughout the site. Therefore, construction activities are best evaluated as multiple moving point sources within the construction area since the speed and power of the equipment vary, and the equipment constantly changes position in terms of its distance and direction relative to the receivers. Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts by phase at the nearby sensitive receiver locations were completed. To account for the dynamic nature of construction activities, the CadnaA construction noise analysis evaluates the noise source activities as multiple moving point sources, or construction crews, within the limits of construction. Construction impacts are based on the loudest activity and the highest noise level calculated at each receiver location. As shown in Table 4.13-8, *On-Site Construction Equipment Noise Level* Summary, the highest on-site construction noise levels are expected to range from 59.7 to 66.7 dBA Leq at the nearby receiver locations. Appendix 10.1 of the Project's NIA (*Technical Appendix J*) includes the detailed CadnaA construction noise model inputs. (Urban Crossroads, 2025d, p. 70)

**Table 4.13-8 On-Site Construction Equipment Noise Level Summary**

| Receiver Location[1] | Construction Noise Levels (dBA $L_{eq}$) | | | |
|---|---|---|---|---|
| | In-Tract Utilities | Phase 1 | Phase 2 | Highest Levels[2] |
| R1 | 53.1 | 59.7 | 55.4 | 59.7 |
| R2 | 55.2 | 61.8 | 57.5 | 61.8 |
| R3 | 56.7 | 63.3 | 59.0 | 63.3 |
| R4 | 60.1 | 66.7 | 62.4 | 66.7 |
| R5 | 57.9 | 64.5 | 60.2 | 64.5 |
| R6 | 54.7 | 61.3 | 57.0 | 61.3 |

[1] Noise receiver locations are shown in Figure 4.13-4.
[2] Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 11.1 to the Project's NIA (*Technical Appendix J*).
(Urban Crossroads, 2025d, Table 11-2)

### *2. Construction Noise Level Compliance*

To evaluate whether the Project will generate potentially significant short-term noise levels at the nearest receiver locations, a construction-related daytime noise level threshold of 80 dBA $L_{eq}$ is used as a reasonable threshold to assess the daytime construction noise level impacts. The construction noise analysis shows that the nearest receiver locations will satisfy the reasonable daytime 80 dBA $L_{eq}$ significance threshold during Project construction activities, as shown in Table 4.13-9, *Construction Noise Level Compliance*.

Therefore, the noise impacts due to the Project construction noise are considered *less than significant* at all receiver locations. (Urban Crossroads, 2025d, pp. 70-71)

### *3. Temporary Construction Noise Level Increases*

To describe the temporary noise level increase associated with Project construction activities, the Project construction noise levels were combined with the existing ambient noise level measurements at the nearest off-site receiver locations, and then the difference between the combined increase and the ambient conditions was calculated. The difference between the combined Project-construction and ambient noise levels is used to describe the construction noise level increases. The temporary noise level increases that would be experienced at noise-sensitive receiver locations are presented in Table 4.13-10, *Daytime Construction Noise Level Increases (Unmitigated)*. As shown, Receptor R4 would be exposed to noise level increases of up to 19.4 dBA Leq while Receptor R5 would be exposed to noise level increases of up to 17.8 dBA Leq, both of which would exceed the threshold of significance of 12.0 dBA Leq. Thus, prior to mitigation, Project-related construction noise increases would represent a significant impact at Receptors R4 and R5 for which mitigation would be required. (Urban Crossroads, 2025d, p. 71)

### *4. Off-Site Construction Noise Analysis*

To support the Project development, there would be pavement removal, trenching, and paving for off-site improvements associated with roadway construction and utility installation for the Project. These off-site improvements would be constructed mostly within the existing public right-of-way (ROW). It is expected

**Table 4.13-9 Construction Noise Level Compliance**

| Receiver Location[1] | Construction Noise Levels (dBA $L_{eq}$) | | |
|---|---|---|---|
| | Highest Construction Noise Levels[2] | Threshold[3] | Threshold Exceeded?[4] |
| R1 | 59.7 | 80 | No |
| R2 | 61.8 | 80 | No |
| R3 | 63.3 | 80 | No |
| R4 | 66.7 | 80 | No |
| R5 | 64.5 | 80 | No |
| R6 | 61.3 | 80 | No |

[1] Noise receiver locations are shown on Figure 4.13-4.
[2] Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations as shown in Table 11-2 of the Project's NIA (*Technical Appendix J*).
[3] Construction noise level thresholds as shown in Table 4.13-5.
[4] Do the estimated Project construction noise levels exceed the construction noise level threshold?
(Urban Crossroads, 2025d, Table 11-3)

**Table 4.13-10 Daytime Construction Noise Level Increases (Unmitigated)**

| Receiver Location[1] | Total Project Construction Noise Level[2] | Measurement Location[3] | Reference Ambient Noise Levels[4] | Combined Project and Ambient[5] | Project Increase[6] | Increase Criteria | Increase Criteria Exceeded? |
|---|---|---|---|---|---|---|---|
| R1 | 59.7 | L1 | 54.8 | 60.9 | 6.1 | 12 | No |
| R2 | 61.8 | L2 | 54.1 | 62.5 | 8.4 | 12 | No |
| R3 | 63.3 | L3 | 53.8 | 63.8 | 10.0 | 12 | No |
| R4 | 66.7 | L4 | 47.4 | 66.8 | 19.4 | 12 | **Yes** |
| R5 | 64.5 | L5 | 46.8 | 64.6 | 17.8 | 12 | **Yes** |
| R6 | 61.3 | L6 | 64.2 | 66.0 | 1.8 | 12 | No |

[1] Construction noise source and receiver locations are shown in Exhibit 11-A of the Project's NIA (*Technical Appendix J*).
[2] Total Project daytime construction noise levels as shown in Table 4.13-8.
[3] Reference noise level measurement locations as shown in Exhibit 5-A of the Project's NIA.
[4] Observed daytime ambient noise levels as shown in Table 4.13-1.
[5] Represents the combined ambient conditions plus the Project construction activities.
[6] The noise level increase expected with the addition of the Project construction activities.
(Urban Crossroads, 2025d, Table 11-4)

that the off-site construction activities would not take place at any one location for more than several days due to the nature of the linear construction activity. Daily roadway and in-road utility construction work typically includes an area one-third the width of the roadway and extends 200 to 300 feet in length, i.e., the area within which heavy equipment moves back and forth. This would result in a minimum distance of 150 feet from the centroid of the construction activity. Construction noise from this off-site work would be relatively short-term, and the noise levels would be reduced as construction work moves linearly along with the selected alignment and farther from sensitive uses. (Urban Crossroads, 2025d, p. 73)

As shown in Table 4.13-11, *Off-Site Construction Noise Analysis*, the loudest stage of construction associated with off-site improvements would be grading activities. Using the loudest stage of construction activity, Table 4.13-11 presents the estimated Project-related off-site construction noise levels at distances ranging from 25 to 200 feet from the roadway centered on the work area. At distances ranging from 25 to 200 feet, the off-site construction noise levels are estimated to range from 64.6 to 68.45 dBA Leq. Since the off-site construction activities would not exceed the 80 dBA Leq construction noise level standard, the noise impacts due to these off-site activities would less than significant. Appendix 11.2 to the Project's NIA (*Technical Appendix J*) includes the CadnaA off-site construction noise calculations. (Urban Crossroads, 2025d, p. 73)

### B. Operational Noise Impacts

Following is an analysis of the potential stationary-source operational noise impacts at the nearest receiver locations, identified previously in subsection 4.13.5.A, resulting from the operation of the proposed Project. Exhibit 10-A of the Project's NIA (*Technical Appendix J*) identifies the noise source locations used to assess the hourly average Leq operational noise levels consistent with the Riverside County General Plan Noise Element Policy N 4.1. (Urban Crossroads, 2025d, p. 57)

**Table 4.13-11 Off-Site Construction Noise Analysis**

| Distance From Construction (Feet) | Construction Noise Levels (dBA $L_{eq}$) [1] | | |
|---|---|---|---|
| | Construction Noise Levels (dBA $L_{eq}$) | Threshold[2] | Threshold Exceeded?[3] |
| 25 | 78.8 | 80 | No |
| 50 | 75.2 | 80 | No |
| 100 | 71.6 | 80 | No |
| 200 | 67.9 | 80 | No |

[1] Off-site construction noise calculations are included in Appendix 11.2 of the Project's NIA (*Technical Appendix J)*
[2] Construction noise level thresholds as shown on Table 4-1 of the Project's NIA (*Technical Appendix J*).
[3] Do the estimated Project construction noise levels exceed the construction noise level threshold?
(Urban Crossroads, 2025d, Table 11-6)

### *1. Project Operational Noise Level Compliance*

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the County of Riverside exterior noise level standards at the nearest noise-sensitive receiver locations. Using the reference sound power levels to represent the proposed Project operations, Urban Crossroads calculated the operational source noise levels that are expected to be generated at the Project site that would be experienced at each of the sensitive receiver locations. Table 4.13-12, *Project Operational Noise Level Compliance*, shows the Project operational noise levels at the off-site receiver locations are expected to range from 27.5 to 32.1 dBA Leq. Table 4.13-12 also shows that the operational noise levels associated with the Project would satisfy the County of Riverside 55 dBA Leq daytime and 45 dBA Leq nighttime exterior noise level standards at the nearest receiver locations. Therefore, the Project's operational noise impacts are considered less than significant at the nearest noise-sensitive receiver locations. (Urban Crossroads, 2025d, p. 60)

**Table 4.13-12 Project Operational Noise Level Compliance**

| Receiver Location[1] | Project Operational Noise Levels (dBA $L_{max}$) | | Exterior Noise Level Standards (dBA $L_{max}$)[2] | | Noise Level Standards Exceeded?[3] | |
|---|---|---|---|---|---|---|
| | Daytime | Nighttime | Daytime | Nighttime | Daytime | Nighttime |
| R1 | 30.3 | 27.5 | 55 | 45 | **No** | **No** |
| R2 | 30.9 | 28.2 | 55 | 45 | **No** | **No** |
| R3 | 34.8 | 32.1 | 55 | 45 | **No** | **No** |
| R4 | 33.7 | 30.9 | 55 | 45 | **No** | **No** |
| R5 | 34.4 | 31.7 | 55 | 45 | **No** | **No** |
| R6 | 32.7 | 30.0 | 55 | 45 | **No** | **No** |

[1] See Figure 4.13-4 for the receiver locations.
[2] Exterior noise level standard for residential land use as shown in Table 4.13-5.
[3] Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:01 a.m. to 10:00 p.m.; "Nighttime" = 10:01 p.m. to 7:00 a.m.
(Urban Crossroads, 2025d, Table 10-2)

### *2. Project Operational Noise Level Increases*

To describe the Project operational noise level increases, the Project operational noise levels are combined with the existing ambient noise levels measurements for the nearest receiver locations potentially impacted by Project operational noise sources. Since the units used to measure noise, decibels (dB), are logarithmic units, the Project-operational and existing ambient noise levels cannot be combined using standard arithmetic equations. Instead, they must be logarithmically added using the base equation presented in Subsection 10.5 of the Project's NIA (*Technical Appendix J*). The difference between the combined Project and ambient noise levels describes the Project noise level increases to the existing ambient noise environment. Noise levels that would be experienced at receiver locations when Project-source noise is added to the daytime and nighttime ambient conditions are presented in Table 4.13-13, *Daytime Project Operational Noise Level Increases*, and Table 4.13-14, *Nighttime Operational Noise Level Increases*, respectively. Table 4.13-13 shows that the Project would generate a daytime operational noise level increase of less than 0.1 to 0.2 dBA Leq at the nearest receiver locations. Table 4.13-14 shows that the Project would generate nighttime operational noise level increases ranging from less than 0.1 to 1.1 dBA Leq at the nearest receiver locations. (Urban Crossroads, 2025d, p. 61) Based on the significance criteria presented in Table 4.13-5, the Project-related operational noise level increases would satisfy the operational noise level increase criteria at the nearest sensitive receiver locations and the impact would be less than significant.

## C. Off-Site Transportation Noise Impacts

Noise contours were used to assess the Project's incremental 24-hour dBA CNEL traffic-related noise impacts at receiving land uses adjacent to roadways conveying Project traffic. The noise contours represent the distance to noise levels of a constant value and are measured from the center of the roadway for the 70, 65, and 60 dBA CNEL noise levels. The noise contours do not consider the effect of any existing noise barriers or topography that may attenuate traffic noise levels. In addition, because the noise contours reflect the modeling of vehicular noise on area roadways, they appropriately do not reflect noise contributions from the surrounding stationary noise sources within the Project study area. Tables 7-1 through 7-4 of the Project's NIA (*Technical Appendix J*) present a summary of the exterior dBA CNEL traffic noise levels, without barrier attenuation, for the 25 study area roadway segments analyzed from the without Project to the with Project conditions for each of the following conditions (Urban Crossroads, 2025d, p. 37):

1. Existing (2024) Without Project
2. Existing (2024) With Project (Project Buildout)
3. Existing plus Ambient Growth plus Cumulative (EAC) (2030) Without Project
4. Existing plus Ambient Growth plus Cumulative (EAC) (2030) With Project (Project Buildout)

Appendix 7.1 of the Project's NIA (*Technical Appendix J*) includes a summary of the dBA CNEL traffic noise level contours for each of the traffic scenarios. (Urban Crossroads, 2025d, p. 37)

**Table 4.13-13 Daytime Project Operational Noise Level Increases**

| Receiver Location[1] | Total Project Operational Noise Level[2] | Measurement Location[3] | Reference Ambient Noise Levels[4] | Combined Project and Ambient[5] | Project Increase[6] | Increase Criteria[7] | Increase Criteria Exceeded? |
|---|---|---|---|---|---|---|---|
| R1 | 30.3 | L1 | 54.8 | 54.8 | 0.0 | 5.0 | **No** |
| R2 | 30.9 | L2 | 54.1 | 54.1 | 0.0 | 5.0 | **No** |
| R3 | 34.8 | L3 | 53.8 | 53.9 | 0.1 | 5.0 | **No** |
| R4 | 33.7 | L4 | 47.4 | 47.6 | 0.2 | 5.0 | **No** |
| R5 | 34.4 | L5 | 46.8 | 47.0 | 0.2 | 5.0 | **No** |
| R6 | 32.7 | L6 | 64.2 | 64.2 | 0.0 | 3.0 | **No** |

[1] See Figure 4.13-4for the receiver locations.
[2] Total Project daytime operational noise levels as shown in Table 4.13-12.
[3] Reference noise level measurement locations as shown in Exhibit 5-A of the Project's NIA (*Technical Appendix J*).
[4] Observed daytime ambient noise levels as shown in Table 4.13-1.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the Project activities.
[7] Significance increase criteria as shown in Table 4.13-5.
(Urban Crossroads, 2025d, Table 10-3)

**Table 4.13-14 Nighttime Operational Noise Level Increases**

| Receiver Location[1] | Total Project Operational Noise Level[2] | Measurement Location[3] | Reference Ambient Noise Levels[4] | Combined Project and Ambient[5] | Project Increase[6] | Increase Criteria[7] | Increase Criteria Exceeded? |
|---|---|---|---|---|---|---|---|
| R1 | 27.5 | L1 | 46.1 | 46.2 | 0.1 | 5.0 | **No** |
| R2 | 28.2 | L2 | 41.1 | 41.3 | 0.2 | 5.0 | **No** |
| R3 | 32.1 | L3 | 41.0 | 41.5 | 0.5 | 5.0 | **No** |
| R4 | 30.9 | L4 | 36.8 | 37.8 | 1.0 | 5.0 | **No** |
| R5 | 31.7 | L5 | 37.2 | 38.3 | 1.1 | 5.0 | **No** |
| R6 | 30.0 | L6 | 57.7 | 57.7 | 0.0 | 5.0 | **No** |

[1] See Figure 4.13-4 for the receiver locations.
[2] Total Project nighttime operational noise levels as shown in Table 4.13-12.
[3] Reference noise level measurement locations as shown in Exhibit 5-A of the Project's NIA (*Technical Appendix J*).
[4] Observed nighttime ambient noise levels as shown in Table 4.13-1.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the Project activities.
[7] Significance increase criteria as shown in Table 4.13-5.
(Urban Crossroads, 2025d, Table 10-4)

### *2. Existing (2024) Project Traffic Noise Level Increases*

An analysis of existing traffic noise levels plus traffic noise generated by the Project has been included herein for informational purposes and to fully analyze all the existing traffic scenarios identified in the Project's TA (*Technical Appendix L2* to this EIR). However, the analysis of existing off-site traffic noise levels plus traffic noise generated by the Project scenario will not actually occur since the Project would not be fully constructed and operational until future conditions when the Project is built and fully occupied. Table 7-1 of the Project's NIA (*Technical Appendix J* to this EIR) shows the Existing without Project conditions CNEL noise

levels. The Existing without-Project exterior noise levels range from 58.6 to 73.6 dBA CNEL without accounting for any noise attenuation features such as noise barriers or topography. Table 7-2 of the Project's NIA (*Technical Appendix J* to this EIR) shows the Existing with Project conditions range from 64.6 to 73.7 dBA CNEL. Table 4.13-15, *Existing (2024) with Project Traffic Noise Level Increases*, shows that the Project off-site traffic noise level increases would range from less than 0.1 to 6.6 dBA CNEL on the study area roadway segments. (Urban Crossroads, 2025d, p. 37)

Based on the significance criteria for off-site traffic noise presented in Table 4.13-5, existing noise-sensitive uses on the following study area roadway segments are shown to experience *significant* off-site traffic noise level increases due to the Project traffic under Existing with Project conditions. (Urban Crossroads, 2025d, p. 42)

- Keller Road east of Leon Road (Segment #22)
- Keller Road east of Pourroy Road (Segment #23)

All other roadway segments would not experience noise level increases under Existing with Project conditions that would exceed the established thresholds of significance. Although the Project's would result in a significant traffic-related noise impact, as noted above the proposed Project would not be constructed and operational in 2024; thus, because this scenario would not actually occur and is being presented only for informational purposes, no mitigation measures are required to address the Project's noise level increases under Existing (2024) conditions. (Urban Crossroads, 2025d, p. 42)

### *3. Existing plus Ambient Growth plus Cumulative (EAC) 2030 Project Traffic Noise Level Increases*

Table 7-3 of the Project's NIA (*Technical Appendix J* to this EIR) presents the EAC (2030) without Project conditions CNEL noise levels. The EAC (2030) without Project exterior noise levels range from 59.1 to 75.0 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 7-4 of the Project's NIA shows the EAC (2030) with Project conditions would range from 65.1 to 75.1 dBA CNEL. Table 4.13-16, *EAC (2030) Project Traffic Noise Level Increase*, shows that the Project off-site traffic noise level increases would range from less than 0.1 to 6.2 dBA CNEL. (Urban Crossroads, 2025d, p. 43) Based on the significance criteria for off-site traffic noise presented in Table 4.13-5, existing noise-sensitive uses on the following study area roadway segment are shown to experience significant off-site traffic noise level increases due to the Project traffic under EAC (2030) with Project conditions. Accordingly, Project traffic-related noise impacts to the following roadway segments represent a significant impact of the proposed Project for which mitigation would be required: (Urban Crossroads, 2025d, p. 42)

- Keller Road east of Leon Road (Segment #22)
- Keller Road east of Pourroy Road (Segment #23)

**Table 4.13-15 Existing (2024) with Project Traffic Noise Level Increases**

| ID | Road | Segment | Receiving Land Use[1] | CNEL at Receiving Land Use (dBA)[2] | | | Noise-Sensitive Land Use? | Incremental Noise Level Increase Threshold[3] | |
|---|---|---|---|---|---|---|---|---|---|
| | | | | No Project | With Project | Project Addition | | Limit | Exceeded? |
| 1 | Menifee Rd. | n/o Scott Rd. | Sensitive | 67.3 | 67.4 | 0.1 | Yes | 1.5 | No |
| 2 | Whitewood Rd. | n/o Clinton Keith Rd. | Sensitive | 70.5 | 70.5 | 0.0 | Yes | 1.5 | No |
| 3 | Whitewood Rd. | s/o Clinton Keith Rd. | Sensitive | 70.2 | 70.2 | 0.0 | Yes | 1.5 | No |
| 4 | Leon Rd. | s/o Scott Rd. | Sensitive | 67.6 | 68.6 | 1.0 | Yes | 1.5 | No |
| 5 | Leon Rd. | s/o Keller Rd. | Sensitive | 66.4 | 67.0 | 0.6 | Yes | 1.5 | No |
| 6 | Leon Rd. | n/o Jean Nichols Rd. | Sensitive | 66.9 | 67.5 | 0.6 | Yes | 1.5 | No |
| 7 | Leon Rd. | s/o Jean Nichols Rd. | Sensitive | 67.8 | 68.3 | 0.5 | Yes | 1.5 | No |
| 8 | Winchester Rd. (SR-79) | n/o Domenigoni Pkwy. | Sensitive | 64.4 | 64.6 | 0.2 | Yes | 3.0 | No |
| 9 | Winchester Rd. (SR-79) | s/o Domenigoni Pkwy. | Sensitive | 72.4 | 72.5 | 0.1 | Yes | 1.5 | No |
| 10 | Winchester Rd. (SR-79) | n/o Scott Rd. | Sensitive | 72.5 | 72.6 | 0.1 | Yes | 1.5 | No |
| 11 | Winchester Rd. (SR-79) | s/o Scott Rd. | Sensitive | 69.6 | 69.8 | 0.2 | Yes | 1.5 | No |
| 12 | Winchester Rd. (SR-79) | n/o Whispering Heights Pkwy./Pourroy Rd. | Sensitive | 70.2 | 70.4 | 0.2 | Yes | 1.5 | No |
| 13 | Winchester Rd. (SR-79) | s/o Whispering Heights Pkwy./Pourroy Rd. | Sensitive | 70.1 | 70.3 | 0.2 | Yes | 1.5 | No |
| 14 | Winchester Rd. (SR-79) | n/o Thompson Rd. | Sensitive | 70.2 | 70.4 | 0.2 | Yes | 1.5 | No |
| 15 | Winchester Rd. (SR-79) | s/o Thompson Rd. | Sensitive | 70.1 | 70.2 | 0.1 | Yes | 1.5 | No |
| 16 | Winchester Rd. (SR-79) | n/o Via Maira Mosa/Audl Rd. | Sensitive | 71.8 | 71.9 | 0.1 | Yes | 1.5 | No |
| 17 | Winchester Rd. (SR-79) | n/o La Alba Dr./Sparkman Wy. | Sensitive | 72.0 | 72.1 | 0.1 | Yes | 1.5 | No |
| 18 | Winchester Rd. (SR-79) | s/o La Alba Dr./Sparkman Wy. | Sensitive | 72.4 | 72.4 | 0.0 | Yes | 1.5 | No |
| 19 | Scott Rd. | w/o Menifee Rd. | Sensitive | 71.6 | 71.8 | 0.2 | Yes | 1.5 | No |
| 20 | Scott Rd. | e/o Menifee Rd. | Sensitive | 71.4 | 71.7 | 0.3 | Yes | 1.5 | No |
| 21 | Scott Rd. | w/o Leon Rd. | Sensitive | 68.8 | 69.4 | 0.6 | Yes | 1.5 | No |
| 22 | Keller Rd. | e/o Leon Rd. | Sensitive | 59.8 | 64.9 | 5.1 | Yes | 5.0 | **Yes** |
| 23 | Keller Rd. | e/o Pourroy Rd | Sensitive | 58.6 | 65.2 | 6.6 | Yes | 5.0 | **Yes** |
| 24 | Clinton Keith Rd. | w/o Whitewood Rd. | Sensitive | 73.6 | 73.7 | 0.1 | Yes | 1.5 | No |
| 25 | Clinton Keith Rd. | e/o Whitewood Rd. | Sensitive | 73.5 | 73.6 | 0.1 | Yes | 1.5 | No |

[1] Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[3] Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.13-5)?
(Urban Crossroads, 2025d, Table 7-5)

### D. On-Site Traffic Noise Impacts

CEQA requires evaluation of a project's impact on the environment, and not the environment's impact on a project. Regardless, for informational purposes, and to evaluate compatibility with Riverside County General Plan Noise Element land use compatibility guidelines (refer to Table 4.13-4) and Riverside County Ordinance No. 847, future exterior noise levels on the Project site were calculated to identify if noise abatement measures that would be needed to achieve acceptable on-site exterior and interior noise levels. The primary source of transportation noise affecting the Project site is anticipated to be from Winchester Road (SR-79) and Keller Road. The Project would also be exposed to nominal traffic noise from the Project's internal roads. However, due to the distance, topography, and low traffic volume/speed, traffic noise from these roads will not make a substantive contribution to ambient noise conditions. The section of Planning Area 4 south of Planning Area 11 is herein referred to as South PA 4 (SR-79) and the remaining northern section of Planning Area 4 to the west of Planning Area 11 is referred to herein as North PA 4 (SR-79) for the purposes of this analysis. (Urban Crossroads, 2025d, p. 47)

#### *1. On-Site Exterior Noise Analysis*

Using the FHWA traffic noise prediction model and the parameters outlined in Tables 6-3 to 6-5 Project's NIA (*Technical Appendix J* to this EIR), the expected future exterior noise levels for the on-site Project land uses were estimated. Table 4.13-17, *Unmitigated Future Exterior Noise Levels,* presents a summary of future on-site exterior traffic noise levels. The on-site traffic noise analysis calculations are provided in Appendix 8.1 of the Project's NIA. All future residential uses would require detailed analysis as a component of noise studies that evaluate the implementing projects within each planning area. These final noise studies would utilize any recommendations identified in the Project's NIA in combination with precise grading plans and actual building design specifications to identify any additional noise abatement measures, such as exterior noise barriers and/or building materials (e.g., sound transmission class ratings for windows and doors), if necessary. (Urban Crossroads, 2025d, p. 47)

**Single-Family Residential Land Uses (MDR/MHDR)**

The on-site exterior traffic noise analysis indicates that the noise-sensitive outdoor living areas (backyards) for single-family residential land uses in SP 380A1 Planning Areas 1 and 3 would experience unmitigated exterior noise levels from Keller Road ranging from 63.3 to 67.9 dBA CNEL. Based on *County of Riverside Land Use Compatibility for Community Noise Exposure* shown in Table 4.13-4, the single-family land uses within Planning Areas 1 and 3 are considered conditionally acceptable with unmitigated exterior noise levels of less than 70 dBA CNEL. For conditionally acceptable exterior noise levels, new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and the needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. Accordingly, and although not considered to comprise a significant impact under CEQA, mitigation measures nonetheless

**Table 4.13-16 EAC (2030) Project Traffic Noise Level Increase**

| ID | Road | Segment | Receiving Land Use[1] | CNEL at Receiving Land Use (dBA)[2] | | | Noise-Sensitive Land Use? | Incremental Noise Level Increase Threshold[3] | |
|---|---|---|---|---|---|---|---|---|---|
| | | | | No Project | With Project | Project Addition | | Limit | Exceeded? |
| 1 | Menifee Rd. | n/o Scott Rd. | Sensitive | 69.3 | 69.4 | 0.1 | Yes | 1.5 | No |
| 2 | Whitewood Rd. | n/o Clinton Keith Rd. | Sensitive | 71.0 | 71.0 | 0.0 | Yes | 1.5 | No |
| 3 | Whitewood Rd. | s/o Clinton Keith Rd. | Sensitive | 70.7 | 70.7 | 0.0 | Yes | 1.5 | No |
| 4 | Leon Rd. | s/o Scott Rd. | Sensitive | 68.1 | 69.0 | 0.9 | Yes | 1.5 | No |
| 5 | Leon Rd. | s/o Keller Rd. | Sensitive | 66.9 | 67.5 | 0.6 | Yes | 1.5 | No |
| 6 | Leon Rd. | n/o Jean Nichols Rd. | Sensitive | 67.6 | 68.1 | 0.5 | Yes | 1.5 | No |
| 7 | Leon Rd. | s/o Jean Nichols Rd. | Sensitive | 68.5 | 68.9 | 0.4 | Yes | 1.5 | No |
| 8 | Winchester Rd. (SR-79) | n/o Domenigoni Pkwy. | Sensitive | 64.9 | 65.1 | 0.2 | Yes | 3.0 | No |
| 9 | Winchester Rd. (SR-79) | s/o Domenigoni Pkwy. | Sensitive | 72.9 | 73.1 | 0.2 | Yes | 1.5 | No |
| 10 | Winchester Rd. (SR-79) | n/o Scott Rd. | Sensitive | 73.0 | 73.1 | 0.1 | Yes | 1.5 | No |
| 11 | Winchester Rd. (SR-79) | s/o Scott Rd. | Sensitive | 70.1 | 70.3 | 0.2 | Yes | 1.5 | No |
| 12 | Winchester Rd. (SR-79) | n/o Whispering Heights Pkwy./Pourroy Rd. | Sensitive | 70.7 | 70.9 | 0.2 | Yes | 1.5 | No |
| 13 | Winchester Rd. (SR-79) | s/o Whispering Heights Pkwy./Pourroy Rd. | Sensitive | 70.6 | 70.8 | 0.2 | Yes | 1.5 | No |
| 14 | Winchester Rd. (SR-79) | n/o Thompson Rd. | Sensitive | 70.8 | 70.9 | 0.1 | Yes | 1.5 | No |
| 15 | Winchester Rd. (SR-79) | s/o Thompson Rd. | Sensitive | 70.6 | 70.7 | 0.1 | Yes | 1.5 | No |
| 16 | Winchester Rd. (SR-79) | n/o Via Maira Mosa/Audl Rd. | Sensitive | 72.3 | 72.4 | 0.1 | Yes | 1.5 | No |
| 17 | Winchester Rd. (SR-79) | n/o La Alba Dr./Sparkman Wy. | Sensitive | 72.6 | 72.6 | 0.0 | Yes | 1.5 | No |
| 18 | Winchester Rd. (SR-79) | s/o La Alba Dr./Sparkman Wy. | Sensitive | 72.9 | 72.9 | 0.0 | Yes | 1.5 | No |
| 19 | Scott Rd. | w/o Menifee Rd. | Sensitive | 74.8 | 74.9 | 0.1 | Yes | 1.5 | No |
| 20 | Scott Rd. | e/o Menifee Rd. | Sensitive | 75.0 | 75.1 | 0.1 | Yes | 1.5 | No |
| 21 | Scott Rd. | w/o Leon Rd. | Sensitive | 69.3 | 69.9 | 0.6 | Yes | 1.5 | No |
| 22 | Keller Rd. | e/o Leon Rd. | Sensitive | 60.3 | 65.1 | 4.8 | Yes | 3.0 | **Yes** |
| 23 | Keller Rd. | e/o Pourroy Rd | Sensitive | 59.1 | 65.3 | 6.2 | Yes | 5.0 | **Yes** |
| 24 | Clinton Keith Rd. | w/o Whitewood Rd. | Sensitive | 74.1 | 74.2 | 0.1 | Yes | 1.5 | No |
| 25 | Clinton Keith Rd. | e/o Whitewood Rd. | Sensitive | 74.0 | 74.1 | 0.1 | Yes | 1.5 | No |

[1] Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[3] Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.13-5)?
(Urban Crossroads, 2025d, Table 7-6)

**Table 4.13-17 Unmitigated Future Exterior Noise Levels**

| Planning Area | Land Use[1] | Noise-Sensitive Land Use? | Unmitigated Exterior Noise Level (dBA CNEL)[2] | Land Use Compatibility[3] |
|---|---|---|---|---|
| PA 1 | Single-Family Residential (MDR) | Yes | 63.3 | *Conditionally Acceptable* |
| PA 3 | Single-Family Residential (MHDR) | Yes | 67.9 | *Conditionally Acceptable* |
| PA 4 (Keller Rd.) | Multi-Family Residential (HDR) | Yes | 68.4 | *Conditionally Acceptable* |
| South PA 4 (SR-79) | Multi-Family Residential (HDR) | Yes | 75.4 | *Clearly Unacceptable* |
| North PA 4 (SR-79) | Multi-Family Residential (HDR) | Yes | 71.4 | *Normally Unacceptable* |
| PA 5 | Multi-Family Residential (HDR) | Yes | 69.6 | *Conditionally Acceptable* |

[1] Project land uses as shown on EIR Figure 3-2.
[2] Exterior on-site traffic noise level calculations are included in Appendix 8.1 to the Project's NIA (*Technical Appendix J*).
[3] Based on the General Plan land use compatibility guidelines as shown in Table 4.13-4.
(Urban Crossroads, 2025d, Table 8-2)

would be necessary to achieve the County's exterior noise level standard of 65 dBA CNEL. (Urban Crossroads, 2025d, p. 48)

**Multi-Family Residential (HDR)**

No exterior noise mitigation is required to satisfy the *County of Riverside Land Use Compatibility for Community Noise Exposure* guidelines for multi-family residential uses. Exterior noise mitigation is generally limited to noise-sensitive private outdoor living areas (backyards) for single-family residential land use. As previously shown in Table 4.13-17, the planned multi-family residential land use within the section of SP 380A1 Planning Area 4, south of Planning Area 11, near Winchester Road (SR-79), would experience clearly unacceptable exterior noise levels of up to 75.4 dBA CNEL. For clearly unacceptable exterior noise levels, the Land Use Compatibility for Community Noise Exposure guidelines indicate that new construction or development should generally not be undertaken. Construction costs to make the indoor environment acceptable would be cost prohibitive and the outside use areas would be unusable. However, as shown in this analysis, the interior noise level standards can be met, and the outdoor use areas would be shielded by the buildings to reduce noise levels. Thus, no mitigation would be required for exterior noise levels. (Urban Crossroads, 2025d, pp. 48-49)

The planned multi-family residential land use in the northern section of SP 380A1 Planning Area 4 along Winchester Road (SR-79) would experience normally unacceptable exterior noise levels of 71.4 dBA CNEL. For normally unacceptable exterior noise levels, the Land Use Compatibility for Community Noise Exposure guidelines indicate that new construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made with needed noise insulation features included in the design. Outdoor areas must be shielded. Accordingly, noise mitigation would be required for the multi-family land uses proposed within SP 380A1 Planning Area 4. (Urban Crossroads, 2025d, p. 49)

The planned multi-family residential land use in Planning Area 5 near Winchester Road (SR-79) would experience conditionally acceptable exterior noise levels of 69.6 dBA CNEL. For conditionally acceptable

exterior noise levels, the Land Use Compatibility for Community Noise Exposure guidelines indicate that new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction but with closed windows and fresh air supply systems or air conditioning will normally suffice. Outdoor environment will seem noisy. Accordingly, noise mitigation would be required for the multi-family land uses proposed within SP 380A1 Planning Area 5. (Urban Crossroads, 2025d, p. 49)

### *2. On-Site Interior Noise Analysis*

To ensure that the interior noise levels comply with the interior noise level standards, future exterior noise levels were calculated at the estimated at the first and second floor building façade locations for planned residential home locations. As with exterior noise levels, interior noise levels affected by vehicular traffic along abutting roadways would represent the environment's impact on the Project and are not considered to comprise a significant environmental effect under CEQA. (Urban Crossroads, 2025d, p. 49)

The interior noise level is the difference between the predicted exterior noise level at the building façade and the noise reduction of the structure. Typical building construction will provide a Noise Reduction (NR) of approximately 12 dBA with "windows open" and a minimum 25 dBA noise reduction with "windows closed." However, sound leaks, cracks, and openings within the window assembly can greatly diminish its effectiveness in reducing noise. Several methods are used to improve interior noise reduction, including: [1] weather-stripped solid core exterior doors; [2] upgraded dual-glazed windows; [3] mechanical ventilation/air conditioning; and [4] exterior wall/roof assemblies free of cutouts or openings. (Urban Crossroads, 2025d, p. 50)

To provide the necessary interior noise level reduction, Table 4.13-18, *First Floor Interior Noise Level (CNEL)*, Table 4.13-19, *Second Floor Interior Noise Level (CNEL)*, indicate that the Project land uses along Winchester Road (SR-79) and Keller Road would require a windows-closed condition and a means of mechanical ventilation (e.g., air conditioning). Table 4.13-18 and Table 4.13-19 show that the future unmitigated noise levels at the first and second-floor building façades are expected to range from 56.4 to 75.4 dBA CNEL. The interior noise assessment shows that to satisfy the interior noise level standard of 45 dBA CNEL for residential land uses in the southern section of Planning Area 4, facing Winchester Road (SR-79), upgraded windows and sliding glass doors that have minimum STC ratings of 32 should be provided to both first- and second-floor locations. Similarly, in the northern section of Planning Area 4, facing Winchester Road (SR-79), the first and second floor locations should be provided with upgraded windows and sliding glass doors with minimum STC ratings of 28. Finally, at second-floor locations in Planning Area 5, facing Winchester Road (SR-79), should be provided with upgraded windows and sliding glass doors that have a minimum STC rating of 32. Although not considered to comprise a significant impact, mitigation is nonetheless presented herein in subsection 4.13.9 to ensure all future dwelling units on site satisfy the interior noise standard of 45 dBA CNEL. (Urban Crossroads, 2025d, p. 50)

**Table 4.13-18 First Floor Interior Noise Level (CNEL)**

| Planning Area | Noise Level at Façade[1] | Required Interior Noise Reduction[2] | Estimated Interior Noise Reduction[3] | Upgraded Windows[4] | Interior Noise Level[5] | Threshold[6] | Threshold Exceeded? | Recommended STC Rating |
|---|---|---|---|---|---|---|---|---|
| PA 1 | 63.1 | 18.1 | 25 | No | 38.1 | 45.0 | No | 27 |
| PA 3 | 56.4 | 11.4 | 25 | No | 31.4 | 45.0 | No | 27 |
| PA 4 (Keller Rd.) | 68.4 | 23.4 | 25 | No | 43.4 | 45.0 | No | 27 |
| South PA 4 (SR-79) | 75.4 | 30.4 | 25 | Yes | 50.4 | 45.0 | Yes | 32 |
| North PA 4 (SR-79) | 71.4 | 26.4 | 25 | Yes | 46.4 | 45.0 | Yes | 28 |
| PA 5 | 69.6 | 24.6 | 25 | Yes | 44.6 | 45.0 | No | 27 |

[1] Exterior noise level at the facade with a windows closed condition requiring a means of mechanical ventilation (e.g., air conditioning). See Appendix 8.1.
[2] Noise reduction to satisfy the interior noise level threshold.
[3] A minimum of 25 dBA noise reduction is assumed with standard building construction.
[4] Does the required interior noise reduction trigger upgraded windows?
[5] Estimated interior noise level with minimum STC 27 rating for all windows.
[6] Interior noise level threshold: 45 dBA CNEL for residential use (California Code of Regulations, Title 24, Building Standards Administrative Code) and 50 dBA CNEL for commercial uses (Based on the California Green Building Standards Code, Section 5.507.4.2).
(Urban Crossroads, 2025d, Table 8-3)

**Table 4.13-19 Second Floor Interior Noise Level (CNEL)**

| Planning Area | Noise Level at Façade[1] | Required Interior Noise Reduction[2] | Estimated Interior Noise Reduction[3] | Upgraded Windows[4] | Interior Noise Level[5] | Threshold[6] | Threshold Exceeded? | Recommended STC Rating |
|---|---|---|---|---|---|---|---|---|
| PA 1 | 63.1 | 18.1 | 25 | No | 38.1 | 45 | No | 27 |
| PA 3 | 65.4 | 20.4 | 25 | No | 40.4 | 45 | No | 27 |
| PA 4 (Keller Rd.) | 59.3 | 14.3 | 25 | No | 34.3 | 45 | No | 27 |
| South PA 4 (SR-79) | 75.4 | 30.4 | 25 | Yes | 50.4 | 45 | Yes | 32 |
| North PA 4 (SR-79) | 71.4 | 26.4 | 25 | Yes | 46.4 | 45 | Yes | 28 |
| PA 5 | 75.0 | 30.0 | 25 | Yes | 50.0 | 45 | Yes | 32 |

[1] Exterior noise level at the facade with a windows closed condition requiring a means of mechanical ventilation (e.g., air conditioning). See Appendix 8.1.
[2] Noise reduction to satisfy the interior noise level threshold.
[3] A minimum of 25 dBA noise reduction is assumed with standard building construction.
[4] Does the required interior noise reduction trigger upgraded windows?
[5] Estimated interior noise level with minimum STC 27 rating for all windows.
[6] Interior noise level threshold: 45 dBA CNEL for residential use (California Code of Regulations, Title 24, Building Standards Administrative Code) and 50 dBA CNEL for commercial uses (Based on the California Green Building Standards Code, Section 5.507.4.2).
(Urban Crossroads, 2025d, Table 8-4)

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

The proposed Project would only have the potential to result in excessive ground-borne vibration or ground borne noise levels during construction activities, as Project operational activities would not involve uneven surfaces that could produce ground-borne vibration affecting nearby sensitive receptors. The Project's potential to result in near-term construction-related vibration impacts is discussed below.

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures, and soil type. It is expected that ground-borne vibration from the Project construction activities would cause only intermittent, localized intrusion. Ground-borne vibration levels resulting from typical construction activities occurring within the Project site were estimated by data published by the Federal Transit Administration (FTA). However, while vehicular traffic is rarely perceptible, construction has the potential to result in varying degrees of temporary ground vibration, depending on the specific construction activities and equipment used. Ground vibration levels associated with various types of construction equipment are summarized in Table 11-7 of the Project's NIA (*Technical Appendix J*). Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential Project construction vibration levels using the following vibration assessment methods defined by Caltrans. To describe the human response (annoyance) associated with vibration impacts, Caltrans provides the following equation: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.1}$ (Urban Crossroads, 2025d, pp. 73-74)

Using the vibration source level of construction equipment provided in NIA Table 11-6 and the construction vibration assessment methodology published by Caltrans, it is possible to estimate the Project vibration impacts. Table 4.13-20, *Project Construction Vibration Levels*, presents the expected Project-related vibration levels at the nearby receiver locations. At distances ranging from 13 to 668 feet from Project construction activities, construction vibration velocity levels are estimated to range from less than 0.01 to 0.31 PPV (in/sec) and would exceed the County of Riverside threshold of 0.30 PPV (in/sec) at receiver location R4, as shown in 0. Therefore, the Project-related vibration impacts are considered potentially significant during the construction activities at the Project site and mitigation would be required. (Urban Crossroads, 2025d, p. 74)

### 4.13.7 Cumulative Impact Analysis

The cumulative study area for the issue of noise includes the Project vicinity as well as areas adjacent to roadways evaluated by the Project's TA (*Technical Appendix L2*). Areas outside of the cumulative study area are too far away to be adversely impacted by noise and ground-borne vibration generated as a result of the proposed Project.

As indicated under the analysis of Threshold a. and b., the Project site is located outside of areas that would be subject to airport-related noise in excess of 55 dBA. There are no components of the proposed Project

**Table 4.13-20 Project Construction Vibration Levels**

| Receiver[1] | Distance to Const. Activity (Feet) | Receiver Levels (in/sec) RMS[2] | | | | | | Threshold (in/sec) PPV[4] | Threshold Exceeded?[5] |
|---|---|---|---|---|---|---|---|---|---|
| | | Small Bulldozer | Jack-hammer | Loaded Trucks | Large Bulldozer | Vibratory Roller | Peak Vibration | | |
| R1 | 668' | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.30 | No |
| R2 | 227' | 0.00 | 0.00 | 0.00 | 0.01 | 0.01 | 0.01 | 0.30 | No |
| R3 | 145' | 0.00 | 0.00 | 0.01 | 0.01 | 0.02 | 0.02 | 0.30 | No |
| R4 | 13' | 0.00 | 0.05 | 0.11 | 0.13 | 0.31 | 0.31 | 0.30 | Yes |
| R5 | 90' | 0.00 | 0.01 | 0.01 | 0.02 | 0.04 | 0.04 | 0.30 | No |
| R6 | 326' | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.01 | 0.30 | No |

[1] Receiver locations are shown in Figure 4.13-4.
[2] Based on the Vibration Source Levels of Construction Equipment included in Table 11-4 of the Project's NIA (*Technical Appendix J*). Vibration levels in PPV are converted to RMS velocity using a 0.71 conversion factor identified in the Caltrans Transportation and Construction Vibration Guidance Manual, September 2013.
[3] Source: County of Riverside General Plan Noise Element, Policy N 16.3.
[4] Does the vibration level exceed the maximum acceptable vibration threshold?
(Urban Crossroads, 2025d, Table 11-8)

that would cause or contribute to increased airport-related noise in the area. As such, impacts would be less-than-cumulatively considerable.

Construction activities associated with the proposed Project and other construction projects in the area may overlap, resulting in construction noise in the area. However, construction noise impacts primarily affect the areas immediately adjacent to the construction site. Cumulative development in the vicinity of the Project site could result in elevated construction noise levels at sensitive receptors in the Project area. As previously indicated on Table 4.13-8, the construction noise levels are expected to range from 59.7 to 66.7 dBA Leq at the nearby receiver locations, which would not exceed the significance threshold of 80 dBA Leq. Even when combined with construction noise associated with cumulative developments that may be under simultaneous construction in the Project area, the total noise levels affecting nearby sensitive receptors would not exceed 80 dBA Leq. However, the Project would result in daytime noise increases of 17.8 dBA Leq at Receptor R5 and increases of 19.4 dBA Leq at Receptor R4, both of which would exceed the significance threshold of 12.0 dBA Leq. Thus, any construction noise from cumulative development in the immediately surrounding area would have the potential to combine with Project-related construction noise affecting Receptors R4 and R5. Therefore, Project-related construction noise increases at Receptors R4 and R5 would represent a cumulatively-considerable impact for which mitigation would be required.

With respect to operational noise, Table 4.13-12 shows that the Project would not generate a measurable daytime operational noise level increase at the nearest receiver locations. Table 4.13-13 show that the Project would generate daytime operational noise level increases ranging from 0.0 to 0.2 dBA Leq at the nearest sensitive receiver locations, while Table 4.13-14 shows that nighttime operational noise level increases would range from 0.0 to 1.1 dBA Leq at the nearest receiver locations. Areas surrounding the Project site are primarily designated by the Riverside County General Plan for residential and open space uses, with commercial areas planned to the south of the Project site. All modeled increases are well below the 5.0 dBA Leq threshold used to identify a substantial cumulative noise impact. Given the low levels of

Project-related operational noise affecting nearby sensitive receptors, the Project's operational noise levels even when combined with noise levels from cumulative sources still would not exceed the operational noise thresholds of significance previously presented in Table 4.13-5. Therefore, the Project's operational noise contribution would not be cumulatively considerable, and impacts would be less than significant.

Table 4.13-16 shows the predicted traffic noise levels under EAC (2030) conditions with the addition of traffic from the proposed Project and other cumulative developments. As shown, the Keller Road segment east of Pourroy Road (Segment 23) is projected to experience an incremental noise level increase of 6.2 dBA CNEL, which exceeds the applicable significance threshold of 5.0 dBA CNEL for this roadway segment. Therefore, this would constitute a cumulatively-considerable significant off-site traffic noise impact . No other roadway segments would exceed their applicable thresholds under cumulative conditions; thus, no other cumulatively-considerable impacts would occur due to cumulative traffic volumes under EAC (2030) conditions.

Impacts associated with exterior and interior noise levels that would be experienced on site represent impacts to, rather than impacts from, the proposed Project. As such, impacts associated with interior and exterior noise impacts would be less than significant on a cumulatively-considerable basis.

As shown in 0, vibration levels associated with Project-related construction activities would exceed the County's peak particle velocity (PPV) significance threshold of 0.30 in/sec at Receptor R5. Peak vibration levels at nearby sensitive receptors are estimated to range from 0.00 to 0.31 in/sec, with only one location (Receptor R4, located 13 feet from construction) predicted to exceed the significance threshold. However, construction-related vibration impacts are highly localized and diminish rapidly with distance. Even in the event that construction at adjacent cumulative projects were to occur simultaneously with Project construction, such activities would need to contribute an equivalent or greater vibration source in close proximity to the same receptor to meaningfully increase the overall vibration exposure. Given the highly localized nature of vibration, the diminishing effect with distance, and the fact that only one receptor is shown to exceed the threshold under worst-case conditions, the Project would not result in a cumulatively considerable contribution to vibration impacts.

### 4.13.8 Significance of Impacts Before Mitigation

Thresholds a and b: Less-than-Significant Impact. The Project does not involve an airport-related component, and would not create or exacerbate aircraft-related noise in the local area. The Project site also occurs well outside of the 55 dBA CNEL contours for the French Valley Airport and would not be exposed to substantial airport-related noise associated with French Valley Airport. Additionally, the Project would not be exposed to substantial noise levels associated with private airstrips. As such, the Project would not expose people residing or working in the Project area to excessive airport-related noise levels, and impacts would be less than significant.

Threshold c: Significant Direct and Cumulatively-Considerable Impact. On-site construction activities would expose nearby sensitive receptors to noise levels ranging from 59.7 to 66.7 dBA Leq, which would not exceed the identified threshold of significance of 80 dBA Leq; thus, construction-related noise impacts

would be less than significant. However, the Project is anticipated to result in a construction-related noise increase of 19.4 dBA Leq at Receptor R4 and 17.8 dBA Leq at Receptor R5, both of which would exceed the threshold of significance of 12.0 dBA Leq. Thus, prior to mitigation, Project-related construction noise level increases would represent as significant direct and cumulatively-considerable impact of the proposed Project.

Long-term operation of the Project's residential and recreational land uses is anticipated to result in noise levels at off-site receiver locations ranging from 27.5 to 32.1 dBA Leq, which would not exceed the County of Riverside 55 dBA Leq daytime or 45 dBA Leq nighttime exterior noise level standards at the nearest receiver locations; thus, impacts due to operational noise levels would be less than significant. In addition, the Project would generate a daytime operational noise level increase of less than 0.1 to 0.2 dBA Leq at the nearest receiver locations, and would generate nighttime operational noise level increases ranging from less than 0.1 to 1.1 dBA Leq at the nearest receiver locations. Based on the significance criteria presented in Table 4.13-5, the Project-related operational noise level increases would satisfy the operational noise level increase criteria at the nearest sensitive receiver locations and the impact would be less than significant.

Based on the significance criteria for off-site traffic noise presented in Table 4.13-5, existing noise-sensitive uses on the following study area roadway segment are shown to experience significant off-site traffic noise level increases due to the Project traffic under EAC (2030) with Project conditions:

- Keller Road east of Leon Road (Segment #22)
- Keller Road east of Pourroy Road (Segment #23)

Accordingly, Project traffic-related noise impacts to the above-listed roadway segments represent a significant impact of the proposed Project for which mitigation would be required.

Additionally, and although not considered to comprise a significant impact under CEQA, the Project's proposed residential uses would be exposed to interior and exterior traffic-related noise levels exceeding the County's standards of 45 dBA CNEL and 65 dBA CNEL, respectively, and as such on-site noise attenuation measures would be required.

Threshold d.: Significant Direct Impact.: The proposed Project would not include any operational components (such as heavy rail, industrial equipment, or frequent large truck activity) that would result in substantial groundborne vibration or groundborne noise levels. Therefore, operational vibration impacts would be negligible. During construction, typical activities such as grading, foundation work, and paving may generate localized groundborne vibration. However, at distances ranging from 13 to 668 feet from Project construction activities, construction vibration velocity levels are estimated to range from less than 0.01 to 0.31 PPV (in/sec) and would exceed the County of Riverside threshold of 0.30 PPV (in/sec) at receiver location R4. Thus, prior to mitigation, Project construction-related vibration impacts at location R4 would represent a potentially significant direct impact for which mitigation would be required.

## 4.13.9 Regulations, Design Requirements, and Mitigation

***Regulations and Design Requirements***

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

- All construction activities and haul truck deliveries shall adhere to Section 2.i of Riverside County Ordinance No. 847, which prohibits construction activities that make loud noise from occurring between 6:00 p.m. and 6:00 a.m. during the months of June through September, and between 6:00 p.m. and 7:00 a.m. during the months of October through May, and on Sundays and Federal holidays.

***Mitigation***

MM 4.13-1 Construction Noise Barriers. To reduce construction noise at Receiver R4 and R5, prior to issuance of grading or building permits, Riverside County shall ensure that an 8-foot-high noise barrier (temporary or permanent) has been installed at the southern Project site boundary in the approximate location identified on Exhibit ES-A of the Project's Noise Impact Analysis (*Technical Appendix J* to the Project's Environmental Impact Report), which shall remain in place for the entirety of construction activities on site. The noise control barrier shall meet the following standards:

a. The noise control barriers shall present a solid face from top to bottom.
b. The noise barriers shall be maintained, and any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired.
c. The temporary noise barrier shall be constructed using one of the following materials with no decorative cutouts or line-of-sight openings between shielded areas and the noise source:
    - An acoustical blanket (e.g. vinyl acoustic curtains, quilted blankets, or equivalent) attached to the construction site perimeter fence or equivalent temporary fence posts.

MM 4.13-2 Project Traffic-Related Noise Mitigation (Off Site). To reduce Project-related traffic noise affecting nearby sensitive receivers, prior to final building inspection for any of the Project's proposed residential uses, Riverside County shall ensure that Keller Road, between Leon Road and Winchester Road, has been paved with Rubberized Hot-Mix Asphalt (RHMA) or Open-Graded Friction Course (OGFC).

MM 4.13-3 On-Site Exterior Traffic Noise Mitigation. In order to address exterior traffic-related noise levels affecting residential dwelling units within Planning Area 3 of Specific Plan No. 380, Amendment No. 1, prior to final building inspection for the Project's residential uses within Planning Area 3 facing Keller Road, Riverside County shall verify that a six-foot-tall noise

barrier has been constructed between Keller Road and the proposed residential dwelling units in Planning Area 3 of Specific Plan No. 380, Amendment No. 1. The required noise control barrier shall be constructed so that the top of each wall extends to the recommended height above the pad elevation of the lot it is shielding. When the road is elevated above the pad elevation, the barrier shall extend to the recommended height above the highest point between the residential home and the road. The barrier shall provide a weight of at least 4 pounds per square foot of surface area, or have a minimum transmission loss of 20 dBA, with no decorative cutouts or line-of-sight openings between shielded areas and the roadways. The barrier must present a solid face from top to bottom, and all gaps (except for weep holes) should be filled with grout or caulking.

MM 4.13-4 On-Site Interior Noise Mitigation – All Residential Units. In order to address interior noise levels associated with the Project's proposed residential uses, prior to issuance of building permits for any of the Project's residential uses, Riverside County shall review the Project's plans to ensure that all residential units are provided with a "windows closed" condition and a means of mechanical ventilation (e.g., air conditioning). Prior to final building inspection, Riverside County shall ensure that these conditions have been satisfied.

MM 4.13-5 Additional On-Site Interior Noise Mitigation – Planning Areas 4 and 5. In order to address interior noise levels associated with multi-family uses in Planning Area 4 of Specific Plan No. 380, Amendment No. 1, prior to issuance of building permits Riverside County shall review the plans to ensure that all residential dwelling units in Planning Area 4 facing Winchester Road are provided with upgraded windows and sliding glass doors with minimum Sound Transmission Class (STC) ratings of 33 and 29, respectively. In addition, in order to address interior noise levels associated with multi-family uses within Planning Area 5 of Specific Plan No. 380, Amendment No. 1, prior to issuance of building permits Riverside County shall review the plans to ensure that all residential dwelling units within Planning Area 5 that face Winchester Road are provided with upgraded second floor windows and sliding glass doors with minimum STC ratings of 32. The required upgraded windows and sliding glass doors shall meet the following standards:

- Windows/Sliding Glass Doors: All residential units require windows and sliding glass doors that have well-fitted, well-weather-stripped assemblies, and the following sound transmission class (STC) ratings:

  1. Residential land uses in South Planning Area 4 will require upgraded windows and sliding glass doors with a minimum STC Rating of 33 (all floors), North Planning Area 4 will require upgraded windows and sliding glass doors with a minimum STC Rating of 29 (all floors), and Planning Area 5 require upgraded windows and sliding glass doors with minimum STC ratings of 32 (second floor);

  2. All other residential lots require windows and sliding glass doors with minimum sound transmission class (STC) ratings of 27.

- Exterior Doors (Non-Glass): All exterior doors shall be well weather-stripped and have well-sealed perimeter gaps around the doors to achieve the STC ratings recommended below:

  1. Residential land uses in South Planning Area 4 will require upgraded doors with a minimum STC Rating of 33 (all floors), North Planning Area 4 will require upgraded doors with a minimum STC Rating of 29 (all floors), and Planning Area 5 require upgraded doors with minimum STC ratings of 32 (second floor);

  2. All other residential lots require doors with minimum sound transmission class (STC) ratings of 27.

- Exterior Walls: At any penetrations of exterior walls by pipes, ducts, or conduits, the space between the wall and pipes, ducts, or conduits shall be caulked or filled with mortar to form an airtight seal.

- Roof: Roof sheathing of wood construction shall be per manufacturer's specification or caulked plywood of at least one-half inch thick. Ceilings shall be per manufacturer's specification or well-sealed gypsum board of at least one-half inch thick. Insulation with at least a rating of R-19 shall be used in the attic space.

- Ventilation:

  1. Arrangements for any habitable room shall be such that any exterior door or window can be kept closed when the room is in use and still receive circulated air. A forced air circulation system (e.g. air conditioning) or active ventilation system (e.g. fresh air supply) shall be provided which satisfies the requirements of the Uniform Building Code.

- Future Noise Studies: Final noise studies shall be prepared for future residential uses within Planning Areas 1, 2, 3, 4, and 5 prior to obtaining building permits for the project. This report shall finalize the mitigation measures described in this study using the precise grading plans and actual building design specifications, and may include additional mitigation, if necessary, to meet the interior noise level standards for residential (45 dBA CNEL) land uses. These noise studies would utilize any recommendations identified in this study and use the precise grading plans and actual building design specifications to identify any additional mitigation, such as exterior noise barriers and/or building materials (e.g., sound transmission class ratings for windows and doors), if necessary, based on the site-specific noise impacts within these planning areas.

MM 4.13-6 Construction-Related Vibration. Prior to issuance of grading or building permits, and in order to reduce potentially significant vibration-related impacts, Riverside County shall review the grading or building plans to ensure that a note is included requiring the implementation of a 15-foot heavy construction equipment exclusion zone, which shall prohibit the use of vibratory rollers within 15 feet of occupied sensitive receiver locations along the western and southern boundaries of the Project site. Project construction contractors shall permit

periodic site visits by County staff to ensure compliance with the heavy construction equipment exclusion zones.

### 4.13.10 Significance of Impacts After Mitigation

Threshold c: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.13-1 would ensure that temporary or permanent noise attenuation barriers are constructed at the southern Project site boundary. As shown in Table 4.13-21, *Daytime Construction Noise Level Increase (with Mitigation)*, Implementation of the required mitigation would reduce Project-related noise increases during Project construction activities such that the Project-related increases at Receptors R4 and R5 would be reduced to 8.3 dBA Leq and 7.6 dBA Leq, respectively, both of which would be below the identified noise level increase criterion of 12.0 dBA Leq. Accordingly, with implementation of the required mitigation, Project impacts due to construction-related noise affecting nearby sensitive receptors would be reduced to below a level of significance. (Urban Crossroads, 2025d, p. 70)

Implementation of Mitigation Measure MM 4.13-3 would ensure that a minimum six-foot-tall noise barrier is constructed between Keller Road and future residential dwelling units within SP 380A1 Planning Area 3. As shown in Table 4.13-22, *Mitigated Future On-Site Exterior Noise Levels*, with implementation of the required mitigation, residential dwelling units within Planning Area 3 would be exposed to exterior traffic-related noise levels of approximately 57.7 dBA CNEL, which would not exceed the exterior noise threshold of significance of 65 dBA CNEL. Accordingly, with implementation of the required mitigation, potential on-site exterior noise impacts would be reduced to less-than-significant levels. (Urban Crossroads, 2025d, p. 52)

It would not be feasible to construct noise barriers to address traffic-related noise affecting sensitive residential receptors located south of Keller Road, as barriers would require openings for driveway access to individual residential lots fronting the road, thus greatly reducing their effectiveness. In lieu of noise barrier construction, the Project Applicant would be required pursuant to Mitigation Measure MM 4.13-2 to repave Keller Road between Leon Road and Winchester Road with Rubberized Hot-Mix Asphalt (RHMA) or Open-Graded Friction Course (OGFC). The application of quieter pavement reduces traffic noise levels at the tire-pavement interface, which has been shown to be the primary source of traffic noise when vehicles travel faster than about 30 mph. Additionally, quieter pavement does not have the same physical site limitations as barriers and typically has a lower upfront cost. The noise performance of quieter pavement can degrade over time, typically 10 years, resulting in increased maintenance and rehabilitation needs for purposes of noise reduction. Rubberized Hot-Mix Asphalt (RHMA) or Open-Graded Friction Course (OGFC) pavement is considered as a mitigation measure for the Project-related roadway improvements associated with Project construction. To reduce traffic noise levels at the noise source, research has shown that rubberized asphalt can provide noise attenuation of approximately ranging from 3 to 8 dBA for automobile traffic noise levels. Changing the pavement type of a roadway has been shown to reduce the amount of tire/pavement noise produced at the source under both near-term and long-term conditions. Traffic noise is generated primarily by the interaction of the tires and pavement, the engine, and exhaust systems. For automobiles noise, as much as 75 to 90-percent of traffic noise is generated by the interaction of the tires and pavement, especially when traveling at higher and constant speeds. According to research conducted

**Table 4.13-21 Daytime Construction Noise Level Increase (with Mitigation)**

| Receiver Location[1] | Total Project Construction Noise Level[2] | Measurement Location[3] | Reference Ambient Noise Levels[4] | Combined Project and Ambient[5] | Project Increase[6] | Increase Criteria | Increase Criteria Exceeded? |
|---|---|---|---|---|---|---|---|
| R1 | 53.6 | L1 | 54.8 | 57.3 | 2.5 | 12 | No |
| R2 | 55.7 | L2 | 54.1 | 58.0 | 3.9 | 12 | No |
| R3 | 57.2 | L3 | 53.8 | 58.8 | 5.0 | 12 | No |
| R4 | 55.0 | L4 | 47.4 | 55.7 | 8.3 | 12 | No |
| R5 | 53.6 | L5 | 46.8 | 54.4 | 7.6 | 12 | No |
| R6 | 55.2 | L6 | 64.2 | 64.7 | 0.5 | 12 | No |

[1] Construction noise source and receiver locations are shown in Exhibit 11-A of the Project's NIA (*Technical Appendix J*).
[2] Total Project daytime construction noise levels as shown in Table 4.13-8.
[3] Reference noise level measurement locations as shown in Figure 4.13-3.
[4] Observed daytime ambient noise levels as shown in Table 4.13-1.
[5] Represents the combined ambient conditions plus the Project construction activities.
[6] The noise level increase expected with the addition of the Project construction activities.
(Urban Crossroads, 2025d, Table 11-5)

**Table 4.13-22 Mitigated Future On-Site Exterior Noise Levels**

| Planning Area | Land Use[1] | Noise-Sensitive Land Use? | Mitigated Exterior Noise Level (dBA CNEL)[2] | Barrier Height (Feet) |
|---|---|---|---|---|
| PA 1 | Single-Family Residential (MDR) | Yes | -- | - |
| PA 3 | Single-Family Residential (MHDR) | Yes | 57.7 | 6' |
| PA 4 (Keller Rd.) | Multi-Family Residential (HDR) | Yes | -[3] | -[3] |
| South PA 4 (SR-79) | Multi-Family Residential (HDR) | Yes | -[3] | -[3] |
| North PA 4 (SR-79) | Multi-Family Residential (HDR) | Yes | -[3] | -[3] |
| PA 5 | Multi-Family Residential (HDR) | Yes | -[3] | -[3] |

[1] Project land uses as described in EIR Section 3.0.
[2] Exterior on-site traffic noise level calculations are included in Appendix 8.1 to the Project's NIA (*Technical Appendix J*).
[3] Exterior noise mitigation is generally limited to single-family private outdoor living areas (backyards).
[4] Non-noise sensitive land use. No exterior noise mitigation is required.
(Urban Crossroads, 2025d, Table 8-2)

by Caltrans and the Canadian Ministry of Transportation and Highways, a 4 to 6 dBA reduction in tire/pavement noise is attainable using rubberized asphalt under typical operating conditions. Implementation of Mitigation Measure MM 4.13-2 would serve to reduce the noise level increases at neighboring noise-sensitive land uses along Keller Road by at least 4 dBA CNEL. Therefore, the Project's anticipated noise level increases of 5.1 and 6.6 dBA CNEL along the two Keller Road segments between Leon Road and Winchester Road would be reduced to 1.1 and 2.6 dBA CNEL, respectively, and would not exceed the threshold of significance identified for these roadway segments. Thus, with implementation of Mitigation Measure MM 4.13-2, the Project's off-site traffic-related noise impacts along Keller Road between Leon Road and Winchester Road would be reduced to less-than-significant levels. (Urban Crossroads, 2025d, p. 44)

Mitigation Measures MM 4.13-4 and MM 4.13-5 have been identified to ensure that future residential uses on site meet the County's interior noise standard of 45 dBA CNEL. Mitigation Measure MM 4.13-4 requires a "windows closed" condition for all of the Project's proposed dwelling units, while Mitigation Measure MM 4.13-5 requires upgraded windows and/or sliding glass doors for multi-family dwelling units facing Winchester Road. With implementation of the required mitigation, the on-site interior traffic noise levels would be reduced to less than significant. (Urban Crossroads, 2025d, p. 52)

Threshold d: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.13-6 would ensure that vibratory rollers are prohibited from operating within 15 feet of the western or southern site boundaries. As shown in Table 4.13-23, *Mitigated Construction Equipment Vibration Levels*, with implementation of the required mitigation, none of the sensitive receptor locations would be exposed to construction-related vibration levels exceeding 0.30 in/sec RMS. Accordingly, with implementation of the required mitigation, Project construction-related vibration impacts would be reduced to less-than-significant levels.

**Table 4.13-23 Mitigated Construction Equipment Vibration Levels**

| Receiver[1] | Distance to Const. Activity (Feet) | Receiver Levels (in/sec) RMS[2] | | | | | | Threshold (in/sec) RMS[4] | Threshold Exceeded?[5] |
|---|---|---|---|---|---|---|---|---|---|
| | | Small Bulldozer | Jack-hammer | Loaded Trucks | Large Bulldozer | Vibratory Roller | Peak Vibration | | |
| R1 | 668' | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.30 | No |
| R2 | 227' | 0.00 | 0.00 | 0.00 | 0.01 | 0.01 | 0.01 | 0.30 | No |
| R3 | 145' | 0.00 | 0.00 | 0.01 | 0.01 | 0.02 | 0.02 | 0.30 | No |
| R4 | 15 | 0.00 | 0.04 | 0.09 | 0.011 | 0.26 | 0.26 | 0.30 | No |
| R5 | 90' | 0.00 | 0.01 | 0.01 | 0.02 | 0.04 | 0.04 | 0.30 | No |
| R6 | 326' | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.01 | 0.30 | No |

[1] Receiver locations are shown In Figure 4.13-4.
[2] Based on the Vibration Source Levels of Construction Equipment included in Table 11-4 of the Project's NIA (*Technical Appendix J*). Vibration levels in PPV are converted to RMS velocity using a 0.71 conversion factor identified in the Caltrans Transportation and Construction Vibration Guidance Manual, September 2013.
[3] Source: County of Riverside General Plan Noise Element, Policy N 16.3.
[4] Does the vibration level exceed the maximum acceptable vibration threshold?
(Urban Crossroads, 2025d, Table 11-9)

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# 4.14 PALEONTOLOGICAL RESOURCES

The analysis in this Subsection is based in part on a Project-specific technical study entitled, "Paleontological Resource Impact Monitoring Program for the Keller Crossing Project" (herein, "PRIMP"), prepared by Brian F. Smith and Associates ("BFSA"), dated July 27, 2022, and appended to this EIR as *Technical Appendix K* (BFSA, 2022). Refer to Section 7.0, *References*, for a complete list of reference sources.

## 4.14.1 Existing Conditions

### A. Geology

Geologically, the Project lies within the Perris Block of the northern Peninsular Ranges batholith, which is bounded by the northwest- to southeast-trending San Jacinto and Elsinore fault zones. Geologic formations potentially impacted by earth disturbance activities are shown on Figures 3a and 3b of the Project's PRIMP (*Technical Appendix K*). The key to the identification of the geologic formations is presented as Figure 3c of the Project's PRIMP. On Figure 3a of the Project's PRIMP, the Project site and off-site improvements are indicated as being underlain by four geological units or formations. On-site, the majority of the project overlies Mesozoic-aged phyllite, a metamorphic rock (colored teal and labeled as "MZp" on Figure 3a of the Project's PRIMP). Variably around the western, southern, and eastern perimeter are Quaternary (middle to early Pleistocene) very old sandy alluvial channel deposits (colored yellow and labeled as "Qvoaa" on Figure 3a of the Project's PRIMP) that are described as fluvial sediments deposited on valley floors and consist of moderately to well-indurated, reddish-brown, dissected gravel, sand, silt, and clay-bearing alluvium. The very old sandy alluvial channel deposits are overlain in places by thin, discontinuous alluvial deposits of Holocene age. At the Project site, the very old alluvial channel deposits overlie the phyllitic bedrock and are less than four feet thick. The off-site improvement areas along Keller Road, east of Winchester Road, are underlain by Quaternary (Holocene and late Pleistocene) young alluvial channel deposits (colored yellow with red dots and labeled as "Qyaa" on Figure 3a of the Project's PRIMP) that line the axis of French Valley. These are fluvial deposits consisting of unconsolidated sand, silt, and clay-bearing alluvium. West of Winchester Road, the planned improvement areas along Keller Road are underlain by Cretaceous-aged gabbro, a crystalline plutonic rock (purple areas on Figure 3a of the Project's PRIMP). (BFSA, 2022, pp. 8-9)

Most of the Project site is covered by approximately one to two feet of colluvium and topsoil deposits, with thicknesses locally of up to approximately nine feet. The sediments are described as mostly residual, as a result of the in situ weathering and degradation of the near-surface bedrock. The colluvium and topsoil generally consist of loose to medium dense, porous, sandy clays to clayey sands. (BFSA, 2022, p. 9)

The geology at the southern off-site roadway improvement areas is shown on Figure 3b of the Project's PRIMP (*Technical Appendix K*). The majority of the alignment is located within very old sandy alluvial channel/valley deposits ("Qvoaa" and "Qvova"). An outcrop of gabbro is mapped in the middle of the planned improvements, while the northern tip of the off-site work may impact an outcrop of Cretaceous tonalite, another type of crystalline plutonic rock. (BFSA, 2022, p. 9)

## B. Paleontological Resources

### *1. Definition*

Paleontological resources are the remains of prehistoric life that have been preserved in geologic strata. These remains are called fossils and include bones, shells, teeth, and plant remains (including their impressions, casts, and molds) in the sedimentary matrix, as well as trace fossils such as footprints and burrows. Fossils are considered older than 5,000 years of age but may include younger remains (subfossils) when, for example, they are viewed in the context of local extinction of the organism or habitat. Fossils are considered a nonrenewable resource under State and County guidelines. (BFSA, 2022, p. 9)

### *2. Fossil Records Search*

A paleontological records search was performed by the paleontological collections manager of the Western Science Center in Hemet in Riverside County, and is attached in Appendix B of the Project's PRIMP (*Technical Appendix K*). Although no fossils are recorded from within the Project site or off-site improvement areas, the records search indicated the presence of late Pleistocene vertebrate fossils associated with the Diamond Valley Lake Project, located approximately three miles north of the Project site. The Diamond Valley Lake Project contained hundreds of fossil localities and thousands of specimens including those associated with mammoth, mastodon, saber-toothed cat, ancient horse, and many other Pleistocene megafauna. The search indicated that the phyllitic rocks are of low paleontological sensitivity, but the Pleistocene alluvial units are considered to be of high paleontological sensitivity and compose many of the region's fossil bearing localities. (BFSA, 2022, p. 13)

A records search conducted by the San Bernardino County Museum (SBCM) in 2009 found no nearby fossil localities held by the SBCM, but indicated the presence of the Diamond Valley Lake Project fossils north of the Project area that were recovered in similar Pleistocene alluvial deposits with those that occur on portions of the Project site. A records search conducted by the Los Angeles County Natural History Museum (LACM) in 2009 similarly indicated the institution held no fossil locality records near the Project site. The records search by the LACM indicated that the closest locality in similar older Quaternary (Pleistocene) deposits to the Keller Crossing Project is LACM locality number 7261, located about three miles south-southeast of the project in what is now Skinner Reservoir, which produced specimens of mammoth and bison fossils. The LACM records search indicated, "Shallow grading in the Quaternary deposits exposed in the lesser elevation portions is unlikely to encounter significant fossil vertebrate remains. Deeper excavations into the older Quaternary alluvium may, however, uncover significant fossil vertebrate remains." (BFSA, 2022, p. 13)

### *3. On-Site Survey Results*

BFSA field technicians conducted a pedestrian survey of the on-site and off-site Project site and off-site improvement areas on April 13, May 10, and October 22, 2021. The surveys were conducted in five- to 15-meter interval transects. Visibility of the natural ground surface ranged from fair to poor, with 50 to 60 percent of the ground surface visible. Rodent spoil piles and patches of turned soil were closely inspected for evidence of small vertebrate fossils. No evidence of paleontological resources was observed within the on-site or off-site Project areas. (BFSA, 2022, p. 13)

## C. Paleontological Sensitivity

### *1. Overview*

The degree of paleontological sensitivity of any particular area is based on a number of factors, including the documented presence of fossiliferous resources on a site or in nearby areas, the presence of documented fossils within a particular geologic formation or lithostratigraphic unit, and whether or not the original depositional environment of the sediments is one that might have been conducive to the accumulation of organic remains that might have become fossilized over time. Holocene alluvium is generally considered to be geologically too young to contain significant, nonrenewable paleontological resources (i.e., fossils), and therefore, is typically assigned a Low paleontological sensitivity. Pleistocene (greater than 11,700 years old) alluvial deposits in western Riverside County and the Inland Empire, however, often yield important Ice Age terrestrial vertebrate fossils, such as extinct mammoths, mastodons, giant ground sloths, extinct species of horse, bison, and camel, saber-toothed cats, and others. These Pleistocene sediments are thus accorded a High paleontological resource sensitivity. (BFSA, 2022, p. 14)

### *2. Professional Standards*

The Society of Vertebrate Paleontology (2010) has drafted guidelines that include four categories of paleontological sensitivity for geologic units (formations) that might be impacted by a proposed project, as listed below (BFSA, 2022, p. 14):

- High Potential: Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered.
- Undetermined Potential: Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment, and that further study is needed to determine the potential of the rock unit.
- Low Potential: Rock units that are poorly represented by fossil specimens in institutional collections or based upon a general scientific consensus that only preserve fossils in rare circumstances.
- No Potential: Rock units that have no potential to contain significant paleontological resources, such as high-grade metamorphic rocks and plutonic igneous rocks.

### *3. Paleontological Sensitivity of Project On- and Off-Site Improvement Areas*

Under the criteria listed above, based the presence of significant fossil localities in western Riverside County and the strong likelihood that the nearby fossil localities of the Diamond Valley Lake Project originated from similar deposits as those which are mapped in the Project area, the Pleistocene very old sandy alluvial channel/valley deposits may be considered to have a high potential to yield significant paleontological resources. The surficial Holocene young alluvial channel deposits may be considered to have an undetermined or low potential. Mesozoic crystalline rocks, such as the outcrops of phyllite and tonalite mapped at the Project areas, have no potential to yield paleontological resources. (BFSA, 2022, pp. 14-15)

## 4.14.2 Applicable Regulatory Requirements

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

### A. Federal Regulations

*1. Paleontological Resources Preservation Act*

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

### B. State Regulations

*1. California Administrative Code, Title 14, Section 4308*

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: “No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value.”

*2. California Public Resources Code*

Public Resources Code § 5097.5 states that “A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.” Public Resources Code § 30244 states that, “Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.”

### C. Local Regulations

*1. Riverside County Planning Department Procedures*

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

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

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

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

### 4.14.3 Basis for Determining Significance

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

- Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

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

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

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

### 4.14.4 Impact Analysis

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

The Project site does not contain any unique geologic features. Although the northern portion of the Project site includes rolling hills, these features are common throughout the surrounding landscape and are not considered unique or distinctive geological formations. Furthermore, a majority of the slopes in the northern portions of the Project site would be preserved as open space. Therefore, Project implementation would not result in the loss of any unique geologic features.

However, based on the findings of the Project's PRIMP, the Project site and off-site improvement areas are underlain in part by very old sandy alluvial channel/valley deposits ("Qvoaa" and "Qvova"), which are assigned a "High" paleontological sensitivity. The occurrence of significant terrestrial vertebrate fossils within Pleistocene alluvial deposits across western Riverside County, including areas near the Project site, is well documented. While the Mesozoic metamorphic rocks ("MZp"), Cretaceous gabbroic and tonalitic rocks ("Kgb, " "Kpvt"), and the Holocene young alluvial channel deposits ("Qyaa") mapped within the study area have no potential to contain paleontological resources, earth-disturbing activities associated with Project construction within areas mapped as being underlain by "Qvoaa" or "Qvova" have the potential to impact nonrenewable paleontological resources buried beneath the surface. As such, implementation of the Project has the potential to result in direct and/or indirect impacts to unique paleontological resources that may be located within areas mapped as being underlain by middle to early Pleistocene very old sandy alluvial channel deposits (Qvoaa). This is evaluated as a significant impact for which mitigation would be required. (BFSA, 2022, pp. 14-15)

### 4.14.5 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other planned and reasonably foreseeable development in the vicinity of the Project site, including buildout under the Riverside County General Plan and the general plans of cities throughout western Riverside County. This cumulative study area was selected because it encompasses a region where similar geological conditions and paleontological sensitivities occur, based on regional geologic mapping and records search data.

As indicated under the analysis of Threshold a, portions of the Project site and off-site improvement areas are underlain by very old sandy alluvial channel/valley deposits ("Qvoaa" and "Qvova"), which are assigned a "High" sensitivity for paleontological resources (BFSA, 2022, pp. 14-15). Construction of the Project would have the potential to directly impact nonrenewable paleontological resources that may be buried within these sensitive geologic units. Similarly, other developments within the cumulative study area that involve ground disturbance in areas underlain by geological formations with a "High" potential for containing paleontological resources could result in significant impacts to paleontological resources. Therefore, the Project's potential impacts to paleontological resource would be significant on a cumulatively-considerable basis.

### 4.14.6 Significance of Impacts Before Mitigation

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The Project would not impact any known paleontological resources or unique geological features, as no such resources were identified based on records searches and field surveys conducted at the Project site. However, portions of the Project site and off-site improvement areas are underlain by very old sandy alluvial channel/valley deposits ("Qvoaa" and "Qvova"), which are assigned a "High" sensitivity for paleontological resources. Therefore, ground-disturbing activities associated with Project grading and excavation could directly or indirectly destroy previously undiscovered paleontological resources. Accordingly, the Project would result in a significant impact to paleontological resources on both a direct and cumulatively considerable basis prior to mitigation.

### 4.14.7 Regulations, Design Requirements, and Mitigation

***Mitigation***

MM 4.14-1 Prior to the issuance of grading permits, the County shall condition proposed grading permits to require implementation of the Project's Paleontological Resource Impact Monitoring Program (PRIMP), which is included as *Technical Appendix K* to the Project's EIR. Provided below is a summary of the requirements identified by the PRIMP:

1. All mass grading, excavation, drilling, and trenching activities within undisturbed Pleistocene very old sandy alluvial channel deposits at the on-site portion of the Project, starting at the surface, shall be monitored full-time for paleontological resources by a Riverside County-qualified paleontologist or a monitor supervised by a Riverside County-qualified paleontologist (Paleontological Monitor). The duration of monitoring may be increased or decreased at the discretion of the Paleontological Monitor based on observations of the geology, stratigraphy, and/or the presence of fossils discovered by the Paleontological Monitor.
2. Prior to the initiation of any grading, drilling, and/or excavation activities, a preconstruction meeting shall be held and attended by the Paleontological Monitor, representatives of the grading contractor and subcontractors, the Project owner or developer, and a representative of the Lead Agency (Riverside County). The nature of potential paleontological resources shall be discussed, as well as the protocol that is to be implemented following discovery of any fossiliferous materials.
3. In the field, the Paleontological Monitor shall be the responsible persons onsite with the assigned authority and responsibility to oversee all grading operations that might adversely affect any salvage efforts.
4. Any identified fossils shall be collected and placed in cardboard flats or plastic buckets and identified by field number, collector, and date collected. Notes shall be taken on the map location and stratigraphy of the site, and the site shall be photographed before it is vacated and the fossils are removed to a safe place.

5. During mass grading, any discovered fossil site shall be protected by red flagging to prevent it from being overrun by earthmovers (scrapers) before salvage begins. All grading activities within 50 feet of the discovery site shall be suspended until fossil recovery has been completed.
6. If the site involves a large terrestrial vertebrate, for example, large bone(s) or a mammoth tusk, that is/are too large to be easily removed by a single monitor, a field crew shall be sent to the site to excavate around the find, encase the discovery within a plaster jacket, and remove it after the plaster has set. For large fossils, use of the contractor's construction equipment shall be solicited to remove the jacket to a safe location before it is returned to an appropriate laboratory facility.
7. In the event that fossils are found by construction workers when the Paleontological Monitor is not on-site or is occupied elsewhere, all work shall be halted within 50 feet of the discovery location until it can be properly evaluated by the Paleontological Monitor.
8. Sediments containing small invertebrate and/or vertebrate fossils also shall be collected as discussed below. When vertebrate fossil remains are recovered, additional sediment samples shall be taken from the same location to process for micro-vertebrate specimens.
9. Isolated fossils shall be collected by hand, wrapped in paper, and placed in temporary collecting flats or five-gallon buckets. Notes shall be taken on the map location and stratigraphy of the site, and the site shall be photographed before it is vacated and the fossils are removed to a safe place. As small invertebrate fossils typically represent multiple specimens of a limited number of organisms, a scientifically-suitable sample shall be obtained from one to several five-gallon buckets of fossiliferous sediment. If it is possible to dry-screen the sediment in the field, a concentrated sample shall consist of one or two buckets of material. For micro-vertebrate fossils, the standard test is usually the observed presence of small pieces of bone within the sediments. If bone is present, as many as 20 to 40 five-gallon buckets of sediment shall be collected and returned to a separate facility to wet screen the sediment. If, after five buckets have been wet-screened and have failed to yield any micro-vertebrate or other fossil material under microscopic examination, then this process can be terminated. In the laboratory, any recovered fossils shall be cleaned of extraneous matrix, any breaks repaired, and the specimen, if necessary, shall be stabilized by soaking in an archivally approved acrylic hardener (e.g., a solution of acetone and Paraloid B-72).
10. Fossils shall be identified by an adjunct invertebrate or vertebrate paleontology specialist, depending on the group of fossils needing identification (e.g., mollusks, reptiles, birds, mammals, or fish). Standard museum curation steps shall be utilized by, or under the direct supervision of, the principal investigator, who has a minimum nine years of paleontological curatorial experience. Curation steps shall include

cleaning, preparing, sorting, identifying, painting, numbering, and labeling all specimens before submittal to the receiving institution.

11. Pursuant to the County of Riverside's "SABER" Policy, paleontological materials (fossils) found in Riverside County shall be directed to the Western Science Center on Searl Road in Hemet, Riverside County, California, unless otherwise directed by the County Geologist. A written agreement between the Project developer and the preferred archival institution shall be in place prior to commencement of grading activities. The Project owner/developer shall assume financial responsibility for any institutional curation fees for the Project.
12. Prior to final grading inspection, a final written report shall be produced by an approved Riverside County paleontologist, and submitted to the County of Riverside Geologist at the conclusion of grading activities for the Project. The report shall include sections on general background information, previous studies (both geologic and paleontologic), results of findings and analysis, discussion of all recovered fossils, and a fossil list identified to the lowest taxonomic level possible, as well as a list of references cited and index and locality maps and graphics to show the locations of all fossil localities, etc. A letter documenting receipt and acceptance of the fossil collections by the receiving institution shall be included in the final report, a copy of which shall be archived with the fossil collection. If fossils are not recovered during the project, the final report shall be in a shortened letter format.

### 4.14.8 Significance of Impacts After Mitigation

Threshold a: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.14-1 would ensure that a Paleontological Resource Impact Mitigation Program (PRIMP) is implemented during future site grading and ground-disturbing activities. Implementation of the Project's PRIMP would ensure that paleontological resources, if uncovered during site grading activities, are appropriately treated, and would reduce the Project's direct and cumulatively-considerable impacts to paleontological resources to less-than-significant levels.

### 4.14.9 References


| Cited As | Reference |
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# 4.15 POPULATION AND HOUSING

This Subsection provides analysis that discloses existing population and housing data from Riverside County and assess the potential for impacts on population and housing associated with implementation of the Project. The analysis in this Subsection is based on information contained in the Riverside County General Plan (including the Housing Element and Southwest Area Plan [SWAP]) and the Southern California Association of Governments (SCAG) 6th Cycle Final Regional Housing Needs Assessment (RHNA) Allocation Plan (Riverside County, 2024; Riverside County, 2021b; SCAG, 2021). Refer to Section 7.0, *References*, for a complete list of reference sources.

## 4.15.1 Existing Conditions

### A. Existing Site Conditions

The Project site consists of undeveloped, vacant land and does not currently contain or support a population, nor does the Project site generate employees. The Project site is in unincorporated Riverside County, specifically within the French Valley Community of the Southwest Area Plan (SWAP) of the Riverside County General Plan. The Project site also is located within the boundaries of the Keller Crossing Specific Plan No. 380 (SP 380). Although the Project site is vacant and undeveloped under existing conditions, the General Plan, SWAP, and SP 380 designate the property for future development with 3 "Very Low Density Residential (VLDR)" dwelling units on 9.9 acres; 25 "Low Density Residential (LDR)" dwelling units on 18.3 acres; 42 "Medium Density Residential (MDR)" dwelling units on 13.9 acres; 39.5 acres of "Mixed Use," including 250 dwelling units and 250,000 square feet (s.f.) building area; 400,000 s.f. of "Commercial Retail (CR)" uses on 37.8 acres; 61.1 acres of "Open Space – Conservation (OS-C)" uses; and 20.6 acres of major circulation facilities. (Riverside County, 2013)

### B. Population Projections

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

**Table 4.15-1 SCAG Regional Projected 2020-2050 Growth Forecast**

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

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

## 4.15.2 Applicable Regulatory Requirements

### A. Federal Plans, Policies, and Regulations

#### *1. Fair Housing Act*

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

#### *2. U.S. Census Bureau*

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

### B. State and Regional Plans, Policies, and Regulations

#### *1. State Housing Law*

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

#### *2. Housing Elements*

California planning and zoning law requires each city and county to adopt a general plan for future growth (Government Code Sections 65100 to 65763). This plan must include a housing element that identifies housing needs for all economic segments and provides opportunities for housing development to meet that need. At the state level, the State Department of Housing and Community Development (HCD) estimates the relative share of California's projected population growth that would occur in each county based on DOF population projections and historical growth trends. These figures are compiled by HCD in a RHNA for each region of California. Where there is a regional council of governments, HCD provides the RHNA to the council. Such is the case for the City, which is a member of SCAG. The council, in this case SCAG, then assigns a share of the regional housing need to each of its cities and counties. The process of assigning

shares gives cities and counties the opportunity to comment on the proposed allocations. HCD oversees the process to ensure that the council of governments distributes its share of the state's projected housing need.

State law recognizes the vital role local governments play in the supply and affordability of housing. To that end, State Housing Law (California Government Code Article 10.6, Sections 65580-65590) mandates that local governments, through Councils of Governments (COGs), identify existing and future housing needs in a Regional Housing Needs Assessment (RHNA). California Government Code (Section 65583) requires that the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.

*Riverside County Housing Element (2021–2029)*

Riverside County, as a member of the Southern California Association of Governments (SCAG), is subject to SCAG's allocation of regional housing needs as part of the RHNA process. The County's 6th Cycle Housing Element, covering the planning period from October 2021 through October 2029, was adopted to comply with the requirements of State Housing Element law (Government Code Sections 65580–65589.8). The Housing Element identifies the County's share of the regional housing need across a range of income levels, evaluates constraints to housing production, and establishes programs to facilitate the development, preservation, and improvement of housing. Table 4.15-2, *Regional Housing Needs Allocation – Unincorporated Riverside County*, provides a summary of the 6th Cycle RHNA allocation for unincorporated Riverside County.

**Table 4.15-2 Regional Housing Needs Allocation – Unincorporated Riverside County**

| Income Category | Allocation |
|---|---|
| Very Low | 10,371 |
| Low | 6,627 |
| Moderate | 7,347 |
| Above Moderate | 16,302 |
| **Total** | **40,647** |

(SCAG, 2021)

To accommodate the County's RHNA obligations, the Housing Element includes an updated inventory of suitable sites, zoning strategies, and implementation programs aimed at increasing housing supply, particularly affordable housing. The County's Housing Element also addresses affirmatively furthering fair housing, consistent with recent State law updates (AB 686), and outlines goals and policies to ensure housing opportunities are equitably distributed throughout the unincorporated areas of the County. (SCAG, 2021)

### *3. State Density Bonus Law*

The State Density Bonus Law codified in Government Code Section 65915 to 65918 provides a mechanism that allows housing developers to increase density on a property above the maximum allowed under a jurisdiction's General Plan or zoning and to request relief from development standards in exchange for offering to build or donate land for affordable or senior housing units. A developer who meets the requirements of the State law is entitled to receive the density bonus and other benefits as a matter of right, including up to a 50 percent increase in project densities for most projects and up to an 80 percent increase in density for project that are completely affordable.

### *4. Senate Bill 330 (Housing Accountability Act)*

California Government Code Section 65589.5, also known as the Housing Accountability Act, prohibits a local agency from disapproving, or conditioning approval in a manner that renders infeasible, a housing development project for very low, low-, or moderate-income households or an emergency shelter unless the local agency makes specified written findings based on a preponderance of the evidence in the record. The act specifies that one way to satisfy that requirement is to make findings that the housing development project or emergency shelter is inconsistent with both the jurisdiction's zoning ordinance and general plan land use designation as specified in any element of the general plan as it existed on the date the application was deemed complete. The act requires a local agency that proposes to disapprove a housing development project that complies with applicable, objective general plan and zoning standards and criteria that were in effect at the time the application was deemed to be complete, or to approve it on the condition that it be developed at a lower density, to base its decision upon written findings supported by substantial evidence on the record that specified conditions exist, and places the burden of proof on the local agency to that effect. The Housing Accountability Act was recently strengthened by the enactment of Senate Bill 330 in 2019, which among other things amended the Housing Accountability Act and established the Housing Crisis Act of 2019.

### *5. Southern California Association of Governments (SCAG)*

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

## C. Local Plans, Policies, and Regulations

### *1. Riverside County General Plan Housing Element*

The 2021-2029 Housing Element identifies and establishes policies intended to fulfill the housing needs of existing and future residents in Riverside County. It establishes policies that guide County decision-making and set forth an action plan to implement its housing goals. The Housing Element includes a review of

previous housing goals, an assessment of the effectiveness of those goals, and an assessment of housing needs. Additionally, the Housing Element includes an inventory of resources and constraints related to meeting housing needs in Riverside County; an analysis of affordable housing developments and programs intended to preserve such housing; community goals for the maintenance, preservation, improvement and development of housing; and a program which sets forth a five-year schedule of actions that the County is undertaking or intends to undertake in implementing the polices set forth in the Housing Element. (Riverside County, 2024, p. H-3)

#### *2. SCAG 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)*

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

### 4.15.3 Basis for Determining Significance

According to Section XIV of Appendix G to the CEQA Guidelines, the proposed Project would result in a significant impact to population and housing if the Project or any Project-related component would:

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

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

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

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

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

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

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

### 4.15.4 Impact Analysis

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

Under existing conditions, the Project site consists of undeveloped land with no dwelling units, structures, or residents located on the Project site. Accordingly, the Project would have no potential to displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. No impacts would occur.

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

The Project would allow for the future development of the approximately 196.1-acre Project site with up to 694 residential dwelling units, including 77 "Medium-Density Residential (MDR)" units on 16.03 acres, 307 "Medium-High-Density Residential (MHDR)" units on 44.63 acres, and 310 "High-Density Residential (HDR)" units, 80 of which are designated as age-restricted, on 26.71 acres. The Project would also include 8.88 acres of "Open Space–Recreation" (OS-R), 16.00 acres of "Open Space–Water" (OS-W), 61.42 acres of "Open Space–Conservation Habitat" (OS-CH), 3.49 acres of "Open Space–Conservation" (OS-C), and 18.89 acres of major circulation facilities.

The Project does not include any land uses, such as commercial retail or light industrial land uses, that would generate new employees or an increased demand for additional housing. Rather, the Project would accommodate a total of 694 dwelling units on site, including 310 HDR dwelling units (of which 80 would be age restricted). The Project's proposed HDR dwelling units would provide for affordable housing, as the HDR land use designation represents one of the more affordable categories of housing under the General Plan Land Use Element. Furthermore, the Riverside County General Plan designates areas of the County in which lower-income housing can be accommodated to meet the County's RHNA obligations, and does not rely on residential development on the Project site in order to meet its RHNA obligations. The Project would have no effect on the portions of the County that are planned to accommodate housing for lower-income households. Therefore, the Project would not create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income, and no impact would occur.

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

Under existing conditions, the Project site is designated by the General Plan, SWAP, and the adopted Keller Crossing Specific Plan (SP 380) for development with 3 VLDR dwelling units on 9.9 acres; 25 LDR dwelling units on 18.3 acres; 42 MDR dwelling units on 13.9 acres; 39.5 acres of Mixed Use, including 250 dwelling

units and 250,000 square feet (s.f.) building area; 400,000 s.f. of CR uses on 37.8 acres; 61.1 acres of OS-C uses; and 20.6 acres of major circulation facilities. Table 4.15-3, *Adopted SP 380 Population and Employment Generation*, depicts the anticipated number of residents and employees that would be generated with buildout of the adopted SP 380 land use plan, based on the population and employment factors specified by Appendix E to the Riverside County General Plan. As shown, the adopted land uses would generate approximately 1,014 residents and 800 employees, for a total site population (residents plus employees) of 1,814 persons. (Riverside County, 2021a, Appendix E, Tables E-2 and E-5)

**Table 4.15-3 Adopted SP 380 Population and Employment Generation**

| Land Use | Intensity (du/s.f.) | Population/Employment Factors[1] | Population/Employees |
|---|---|---|---|
| Residential | 320 du | 3.17 persons per household (pph) | 1,014 persons |
| Commercial Retail | 400,000 s.f. | 1 employee/500 s.f. | 800 employees |
| | | **Total Population Plus Employment:** | **1,814 persons** |

1. Population generation factors were taken from Table E-2 (Average Household Size by Area Plan) from Appendix E to the General Plan, while employment generation factors were taken from Table E-5 (Commercial Employment Factors) of Appendix E to the General Plan.

Note: du = dwelling units; s.f. = square feet; pph = persons per household.
(Riverside County, 2021a, Appendix E, Tables E-2 and E-5)

The Project Applicant proposes to amend the land use designations for the approximately 196.1-acre site to accommodate a revised mix of residential and open space uses, including 77 "Medium-Density Residential (MDR)" units on 16.03 acres; 307 "Medium-High-Density Residential (MHDR)" units on 44.63 acres; 310 "High-Density Residential (HDR)" units, 80 of which are designated as age-restricted, on 26.71 acres; 8.88 acres of "Open Space–Recreation" (OS-R); 16.00 acres of "Open Space–Water" (OS-W); 61.42 acres of "Open Space–Conservation Habitat" (OS-CH); 3.49 acres of "Open Space–Conservation" (OS-C); and 18.89 acres of major circulation facilities. Using the population generation factor of 3.17 persons per household (pph) for typical single-family and multi-family residential and a population generation of 2.11 pph for the proposed 80 age-restricted dwelling units, the 614 typical residential dwelling units and 80 age-restricted dwelling units proposed as part of the Project would result in a future site population of approximately 2,115 persons ([614 du x 3.17 pph] + [80 du x 2.11] = 2,115.2 persons) (Riverside County, 2021a, Appendix E, Table E-2). Thus, while buildout of the land uses proposed as part of the Project would result in a net increase in the site's population by approximately 301 persons (2,115 persons – 1,814 persons = 301 persons).

Although the Project would result in a slight net increase in the site's population as compared to the adopted SP 380, this increase would not constitute substantial unplanned population growth. As discussed above, the Project site is already designated for residential development under the County's General Plan, SWAP, and the adopted SP 380; the proposed Project would not introduce residential development onto a site not already planned and anticipated for growth, but would instead adjust the intensity and mix of residential land uses already contemplated for the site. The resulting population increase is thus a shift within an already-planned development envelope rather than growth in an area not otherwise slated for development. Furthermore, the Project's incremental increase in population is negligible in the context of regional growth:

as shown in Table 4.15-1, the SCAG region's population is forecast to increase by more than 2,079,000 persons between 2020 and 2050, of which the Project's approximately 301-person increase would represent a negligible fraction. The Project's proposed dwelling units also fall within the housing categories contemplated by the County's 6th Cycle Housing Element and RHNA allocation (refer to Table 4.15-2), such that the resulting population increase would be consistent with, rather than in excess of, planned regional and local growth. Additionally, the Project's proposed roadway and other infrastructure (e.g., water, sewer, etc.) improvements have been designed and sized to serve the Project's population increase, and would not indirectly induce additional growth in the local area. The population increase associated with the proposed Project has been addressed under the relevant issue areas identified throughout this EIR (e.g., public services, recreation, transportation and traffic, etc.). Under each of these topics, Project-related impacts are determined to be less than significant, or mitigation measures have been imposed to reduce impacts to the maximum feasible extent. There are no components of the Project's population increase that have not already been addressed and accounted for throughout this EIR for the Project site. Thus, the Project's slight increase in the site's population would not induce substantial unplanned population growth in the area, either directly or indirectly, and impacts would be less than significant.

### 4.15.5 Cumulative Impact Analysis

For purposes of analysis, the cumulative study area for the issue of population and housing encompasses western Riverside County and the various incorporated cities within that region. This study area is appropriate because population growth and housing development in the region are largely governed by the Riverside County General Plan and the general plans of the individual cities within the County.

The Project site does not contain any existing residential units under current conditions, and the site contains no residents under existing conditions. Therefore, the Project would not result in the displacement of existing residents or housing, and cumulatively-considerable impacts would not occur.

The Project proposes the development of up to 694 residential units, including 310 HDR dwelling units (of which 80 would be age restricted). As such, the Project would accommodate new housing opportunities within the County. The Project does not include any land uses, such as commercial retail or light industrial land uses, that would generate new employees or an increased demand for additional housing. Accordingly, the Project would not result in any cumulatively-considerable impacts through the creation of a demand for additional housing, including housing affordable to households earning 80% or less of the County's median income.

As discussed under the analysis of Threshold c, above, the adopted SP 380 land uses would result in a future site population of approximately 1,814 persons, while the 694 residential dwelling units proposed as part of the Project would result in a future site population of approximately 2,115 persons, representing a net increase in the site's population of approximately 301 persons. As discussed above, this increase would not represent substantial unplanned population growth, as the Project site already is designated for residential development under the County's General Plan, SWAP, and the adopted SP 380, and the proposed Project would adjust the intensity and mix of already-planned residential development rather than introduce growth onto a site not otherwise slated for development. The Project's incremental population increase is also

negligible in the context of regional growth, representing a small fraction of the more than 2,079,000-person increase forecast for the SCAG region between 2020 and 2050 (refer to Table 4.15-1), and falls within the housing categories already contemplated by the County's 6th Cycle Housing Element and RHNA allocation (refer to Table 4.15-2). Other reasonably foreseeable cumulative development within the cumulative study area is similarly subject to the population and housing growth assumptions of the Riverside County General Plan and the general plans of the cities within western Riverside County; as such, the Project's contribution to cumulative population growth would be consistent with, rather than in excess of, planned regional and local growth. Furthermore, cumulatively-considerable impacts associated with buildout of the Project's proposed land uses have been addressed under the relevant issue areas identified throughout this EIR (e.g., public services, recreation, transportation, etc.). Under each of these topics, cumulatively-considerable impacts are determined to be less than significant, or mitigation measures have been imposed to reduce impacts to the maximum feasible extent. There are no components of the Project's population increase that have not already been addressed and accounted for throughout this EIR for the Project site. Additionally, the Project's proposed roadway and other infrastructure (e.g., water, sewer, etc.) improvements have been designed and sized to serve the proposed Project, and would not indirectly induce growth in the local area. Thus, Project impacts due to unplanned population growth would be less than significant on a cumulatively-considerable basis.

### 4.15.6 Significance of Impacts Before Mitigation

Threshold a: No Impact. The Project site does not contain any existing residents or housing, and the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. No impact would occur.

Threshold b: No Impact. The Project does not include any land uses, such as commercial retail or light industrial land uses, that would generate new employees or an increased demand for additional housing. Rather, the Project would accommodate a total of 694 dwelling units on site, including 310 HDR dwelling units (of which 80 would be age restricted). The Project's proposed HDR dwelling units would provide for affordable housing, as the HDR land use designation represents one of the more affordable categories of housing under the General Plan Land Use Element. Furthermore, the Riverside County General Plan designates areas of the County in which lower-income housing can be accommodated to meet the County's RHNA obligations, and does not rely on residential development on the Project site in order to meet its RHNA obligations. The Project would have no effect on the portions of the County that are planned to accommodate housing for lower-income households. Therefore, the Project would not create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income, and no impact would occur.

Threshold c: Less-than-Significant Impact. The adopted SP 380 land uses would result in a future site population of approximately 1,814 persons, while the land uses proposed as part of the Project would result in a future site population of approximately 2,115persons, representing a net increase in the site's anticipated population of approximately 301 persons. This increase would not represent substantial unplanned population growth, as the Project site is already designated for residential development under the County's General Plan, SWAP, and the adopted SP 380, and represents a negligible fraction of the

population growth already forecast for the region. Additionally, the Project's proposed roadway and other infrastructure (e.g., water, sewer, etc.) improvements have been designed and sized to serve the proposed Project, and would not indirectly induce growth in the local area. Furthermore, the increase in population associated with the proposed Project has been addressed under the relevant issue areas identified throughout this EIR (e.g., public services, recreation, transportation and traffic, etc.). Under each of these topics, Project-related impacts are determined to be less than significant, or mitigation measures have been imposed to reduce impacts to the maximum feasible extent. There are no components of the Project's population increase that have not already been addressed and accounted for throughout this EIR for the Project site. Thus, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly, and impacts would be less than significant.

## 4.15.7 Regulations, Design Requirements, and Mitigation

***Mitigation***

Impacts would be less than significant; therefore, mitigation is not required.

## 4.15.8 References


| Cited As | Reference |
|---|---|
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# 4.16 PUBLIC SERVICES

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

## 4.16.1 Existing Conditions

### A. Fire Protection/Emergency Medical Services

Fire protection services for the Project site are provided by the Riverside County Fire Department (RCFD). The RCFD provides a full range of fire services within the County and contracting cities. The level of service provided is dependent on response times, travel distance, and staffing workload levels established in the Riverside County Fire Protection and Emergency Medical Aid Plan. The Fire Protection and Emergency Medical Aid Plan contains four fire response categories that are used to determine the response times/travel distances for primary and secondary fire stations. The response categories are based on the amount of community build-out presumed in the Fire Protection and Emergency Medical Aid Plan. The Fire Department assumes in any given region that three or more fire engines respond to any reported fire.

The fire stations that would serve the Project as the first responder are RCFD Station #83 located at 37500 Sky Canyon Dr, Murrieta, CA, approximately 4.6 miles and nine (9) minutes driving time to the furthest point in the Project site; RCFD Station #34, located at 32655 Haddock St, Winchester, CA, approximately 5.8 miles and nine (9) minutes driving time to the furthest point in the Project site; and RCFD Station #76, located at 29950 Menifee Road, Menifee, CA, approximately 8.2 miles and fifteen (15) minutes driving time to the furthest point in the Project site. (FireWise, 2025, p. 18; Google Earth, 2025) According to the 2024 Fire Hazard Severity Zone maps adopted by CAL FIRE, the Project site is located entirely within a State Responsibility Area (SRA) and is primarily designated as having a “Very High” Fire Hazard Severity Zone classification, while portions of the southern extent of the site transition into “High” and “Moderate” Fire Hazard Severity Zones. (CalFire, 2024)

### B. Sheriff Services

The Riverside County Sheriff’s Department (RCSD) provides community policing for the Project area. The Sheriff Station serving the Project area is the Murrieta Station, located at 30755 Auld Road Suite A in Murrieta, CA, 92563. The Station is approximately 4.6 miles south of the Project site (Google Earth, 2025). In addition to community policing, other services provided by the Sheriff’s Department include, but are not limited to, operating of the emergency 911 system, operating correctional facilities, performing traffic control, and providing crime prevention education. Also, the Sheriff’s Department coordinates with volunteer groups such as Neighborhood Watch Programs and the Community Oriented and Policing Problem Solving (COPPS) Program and the Community Oriented Policing (COP) Program. COPPS shifts the focus of police work from a solely reactive mode by supplementing traditional law enforcement methods with proactive problem-solving approaches that involve the community as well as the police.

Unincorporated Riverside County has set a minimum standard of 1.0 deputy per 1,000 residents. This standard was adopted as part of the "Commitment to Public Safety and Citizens' Option for Public Safety," by the Board of Supervisors on September 17, 1996. The Sheriff's Department has indicated that their desired staffing level is 1.2 deputies per 1,000 residents, while Mitigation Measure 4.15.C of EIR No. 521 establishes a standard of 1.5 sworn peace officers per 1,000 people.

### C. School Services

The Project site is located in the attendance boundary of the Menifee Union School District (MUSD) for K-8 school services, and the Perris Union High School District (PUHSD) for high school services. The nearest school within the MUSD is Harvest Hill Steam Academy, which provides K-8 school services and is located at 31600 Pat Road in Winchester, or approximately 0.5-mile southwest of the Project site. The nearest high school within the PUHSD is the Liberty High School, located at 32255 Leon Road in Winchester, or approximately 3.6 miles northwest of the Project site. (Google Earth, 2025) In the 2024-2025 school year, the MUSD had a total enrollment of 13,989 students, while the PUHSD had an enrollment of 11,832 students (DOE, n.d.; DOE, n.d.).

### D. Libraries

The Project site is located within the Riverside County Library System (RCLS) service area. The County of Riverside operates a system of 34 libraries, four Library Connect Vans, two museums, and a Creation Station. RCLS serves a diverse population of 1.4 million residents in a very large geography covering 7,303 square miles. RCLS locations are the educational and cultural centers of their communities. Services including a collection of over 1.3 million materials, electronic resources, and educational and literacy, job and career development, and life enrichment programs make Riverside County an even better place to live, work, raise families, and do business. In addition, the Riverside County Library System operates an automated network that currently deploys over 350 computer/terminal workstations in the library branches of the Riverside County Library System, Riverside Public Library, Moreno Valley Library, Murrieta Public Library, Murrieta Valley High School, and College of the Desert. The network can also be accessed by Riverside County residents via the Internet. For 2010, the Riverside County Library System reported a total of 681,117 'registered borrowers' utilizing County library services. (Riverside County, 2015, pp. 4.17-65 and 4.17-66; RCLS, n.d.)

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

The nearest library servicing the proposed Project site is the French Valley Library, which was recently constructed in 2020. The French Valley Library is located at 31526 Skyview Road in the Winchester community of unincorporated Riverside County, or approximately 1.3 miles southwest of the Project site. The second closest library to the Project site is the Menifee Library, located at 28798 La Piedra Road in the City of Menifee, or approximately 5.7 miles northwest of the Project site. (Google Earth, 2025)

### E. Health Services

Public health services in Riverside County are provided by the County Department of Public Health. However, most health services are provided by the private sector. The nearest medical facility to the Project site is the Riverside Medical Clinic located at 33040 Antelope Road in Murrieta. The Riverside Medical Clinic is located approximately 5.5 miles northwest of the Project site. (Google Earth, 2025) The Riverside Medical Clinic provides a comprehensive range of health services and medical programs.

## 4.16.2 Applicable Regulatory Requirements

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

### A. State and Local Regulations

#### *1. Fire Protection Services Regulations and Plans*

❑ **California Constitution Article XIII, Section 35**

California Constitution Article XIII, Section 35, subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." California Constitution Article XIII, Section 35, was adopted by the voters in 1993 under Proposition 172. Proposition 172 directs the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, the City is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In City of Hayward v. Board of Trustees of California State University (2015) 242 Cal. App. 4th 833 (City of Hayward), the court found under Section 35 that cities have "a constitutional obligation to provide adequate fire protection services".

❑ **Public Resources Code**

Public Resources Code (PRC) Sections 4290-4299 establish minimum statewide fire safety provisions pertaining to: roads for fire equipment access; signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and fire fuel breaks and greenbelts. With certain exceptions, all new construction after July 1, 1991, in potential wildland fire areas, is required to meet these statewide standards. The state requirements, however, do not supersede more restrictive local regulations.

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.

❑ **PRC Sections 4102-4127 - State Responsibility Areas (SRAs)**

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

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

Part 2 of Title 24 of the CCR refers to the California Building Code which contains complete regulations and general construction building standards of State of California adopting agencies, including administrative, fire and life safety and field inspection provisions. Part 2 was updated in 2008 to reflect changes in the base document from the Uniform Building Code to the International Building Code. Part 9 refers to the California Fire Code, which contains other fire safety-related building standards. In particular, Chapter 7A, "Materials and Construction Methods for Exterior Wildfire Exposure," in the 2010 California Building Code addresses fire safety standards for new construction and Section 701A.3.2 addresses "New Buildings Located in Any Fire Hazard Severity Zone."

❑ **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.).

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

Section 51178 specifies that the Director of CalFire, in cooperation with local fire authorities, must identify areas that are Very High Fire Hazard Severity Zones (VHFHSZs) in Local Responsibility Areas (LRAs), based on consistent statewide criteria and the expected severity of fire hazard. It further specifies that VHFHSZs "shall be based on fuel loading, slope, fire weather and other relevant factors," including areas subject to

Santa Ana winds which are a "major cause of wildfire spread." Section 51179 states that a local agency (such as a county) must also designate (and map) the VHFHSZs in its jurisdiction by ordinance. (See the discussion on Ordinance No. 787, below, regarding Riverside County's VHFHSZs). Other portions of the Government Code outline when a local agency may use its discretion to exclude areas from VHFHSZ requirements or add areas not designated by the State of California to its VHFHSZ areas.

❑ **CGC Section 51182 – Defensible Space**

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

❑ **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 the State's Responsibility Area (SRA) to pay for fire prevention services. The SRA is the portion of the state where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within incorporated city boundaries, Tribal or federally owned land. As a result of AB 398, California Global Warming Solutions Act of 2006, the fire prevention fee was suspended as of July 1, 2017.

❑ **Health and Safety Code Section 13159.5**

Senate Bill 190 was signed into law October 2, 2019, and requires the Office of the State Fire Marshal to develop; in consultation with representatives from local, state, and federal fire services, local government, building officials, utility companies, the building industry, insurers and insurance research organizations, and the environmental community; a model defensible space program to be made available for use by a city, county, or city and county in the enforcement of the defensible space provisions. The bill also adds Health and Safety Code Section 13159.5 to require the Office of the State Fire Marshal to development and make available on its website a Wildland-Urban Interface Fire Safety Building Standards Compliance training intended for use in the training of local building officials, builders, and fire service personnel.

❑ **Riverside County Fire Protection Master Plan**

In 1982, the Board of Supervisors, through Community Development Block Funds, authorized the Fire Protection Master Plan. The Fire Protection Master Plan describes the current and proposed future fire protection and emergency medical system of Riverside County. The study area consists of the cities and unincorporated areas protected by the Riverside County Fire Department. One of the most fundamental concepts associated with the fire protection master planning process is that scope, participation and input be broad based. This master plan describes a total system for provision of fire protection and emergency medical services. In addition to the Riverside County Fire Department, system components include community development and construction; legislation and enforcement agencies; the water distribution systems within the Riverside County Fire Department (RCFD) jurisdictions, and educational institutions.

Similarly, participation and input was received from a number of County agencies as well as from a Citizen's Advisory Committee appointed by the Board of Supervisors. The Fire Protection Master Plan incorporates a number of goals, as listed below:

FIRE PREVENTION

- Implementation and enforcement of strong fire and life safety codes.
- Extensive use of automatic detection and suppression systems.
- Development of citizen awareness of fire/life safety which includes a sense of responsibility for personal protection and the capability to be as self-reliant as possible.

FIRE SUPPRESSION

- Expansion and strengthening of the combination volunteer/ career personnel programs.
- Expansion of the fire suppression force (stations, apparatus and personnel) to meet anticipated response time and fire flow requirements for all areas of each land use category .

EMERGENCY MEDICAL SERVICES

- Provision of a basic emergency first-aid level of emergency medical services (e.g., first responder) to all citizens in the RCFD jurisdiction.

EMERGENCY MANAGEMENT

- Establishment and maintenance of a capability to cope with major emergencies and disasters.

PUBLIC ASSISTANCE

- Provision of appropriate public assistance services to citizens within the jurisdiction.

❑ **Riverside County Ordinance No. 787 (Riverside County Fire Code Adoption)**

Ordinance No. 787 addresses implementation of the California Fire Code. The codes prescribe performance characteristics and materials to be used to achieve acceptable levels of fire protection and include the wildland-urban interface (WUI) fire area building standards. Collectively, the ordinance establishes the requirements and standards for fire hazard reduction regulations within Riverside County (including additions and deletions to the California Fire Code) to fully protect the health, safety and welfare of existing and future residents and workers of Riverside County. Among other things, this ordinance assures that structural and nonstructural architectural elements of the building do not: a) impede emergency egress for fire safety staffing/ personnel, equipment, and apparatus; nor b) hinder evacuation from fire, including potential blockage of stairways or fire doors. In addition, for the purposes of California Fire Code (CFC) implementation, the ordinance also adds a statement noting: "In accordance with Government Code sections 51175 through 51189, Very High Fire Hazard Severity Zones (VHFHSZ), located in the Local Responsibility Areas (LRA), are designated as shown on the most recently published VHFHSZ IN LRA map, as recommended and published by the Director of the California Department of Forestry and Fire Protection (CAL FIRE), which may be revised from time to time. The most recent VHFHSZ IN LRA map is on file at the office of the Fire Chief, which supersedes other maps previously adopted by Riverside County designating high fire hazard areas."

### *2. School Services Regulations and Plans*

❑ **Assembly Bill (AB) 16**

In 2002, AB 16 created the Critically Overcrowded School Facilities program, which supplements the new construction provisions within the School Facilities Program (SFP). The SFP provides State of California funding assistance for new facility construction projects and modernization projects. The Critically Overcrowded School Facilities program allows school districts with critically overcrowded school facilities, as determined by the California Department of Education (CDE), to apply for new construction projects in advance of meeting all SFP new construction program requirements. Districts with SFP new construction eligibility and school sites included on a CDE list of source schools may apply.

❑ **California State Assembly Bill 2926: School Facilities Act of 1986**

To assist in providing school facilities to serve students generated by new development, Assembly Bill (AB) 2926 was enacted in 1986 and authorized a levy of impact fees on new residential and commercial/industrial development. The ability of local governments to collect fees was limited by California Senate Bill 50, the Leroy F. Greene School Facilities Act of 1998.

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

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

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

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

- At least 30% of the district's students are on a multi-track year-round schedule.
- The district has placed on the ballot within the previous four years a local school bond that received at least 50% of the votes cast.

- The district has passed bonds equal to 30% of its bonding capacity.
- Or, at least 20% of the district's teaching stations are relocatable classrooms.

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

### 4.16.3 Basis for Determining Significance

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

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

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, have been updated to reflect the 2018 revisions to Appendix G to the State CEQA Guidelines, and state that the proposed Project would result in a significant impact to public services if the Project or any Project-related component would:

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

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

c. *Result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities, the construction*

*of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services;*

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

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

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

### 4.16.4 Impact Analysis

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

The Project would entail development of the approximately 196.1-acre Project site with up to 694 residential dwelling units, including 77 "Medium-Density Residential (MDR)" units on 16.03 acres, 307 "Medium-High-Density Residential (MHDR)" units on 44.63 acres, and 310 "High-Density Residential (HDR)" units (including 80 dwelling units designated as age-restricted) on 26.71acres; 8.88 acres of "Open Space–Recreation" (OS-R); 16.00 acres of "Open Space–Water" (OS-W); 61.42 acres of "Open Space–Conservation Habitat" (OS-CH); 3.49 acres of "Open Space–Conservation" (OS-C); and 18.89 acres of major circulation facilities. The Project would place additional demand on the RCFD, which provides fire protection services in the Project area. Implementation of the Project would cumulatively affect the Department's ability to service the planned population.

The Project would require an "Urban – Category II" level of service as defined by the Riverside County Fire Protection Master Plan. This classification requires a fire station to be within three roadway miles of all areas of the Project and a full first alarm assignment team operating on the scene of a fire within 15 minutes of dispatch. The primary station serving the Project area (RCFD Station #83) is located approximately 4.6 miles and nine (9) minutes driving time to the furthest point in the Project site, while RCFD Station #34, located approximately 5.8 miles and nine (9) minutes driving time to the furthest point in the Project site, would provide secondary fire protection services to the Project site. Although the distance to the nearest fire stations slightly exceeds the stated goal of having a fire station within 3.0 roadway miles, based on the travel

distance and time between the Project site and Stations #83 and #34, the first unit should arrive at the proposed Project site within approximately nine minutes after dispatch. The estimated response time is approximate but demonstrates that the RCFD would be able to meet the Urban Land Use protection goals of the Fire Protection Master Plan for the Project. (RCFD, n.d., p. 18; FireWise, 2025, p. 12)

As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety. Among other items, these requirements include conformance with Chapter 7A of the California Building Code, which requires that all buildings be constructed with fire retardant roofing material, as well as standard Riverside County Fire Department conditions of approval (COAs) for specific plans, which prohibit flag lots and require alternative/secondary access routes to neighborhoods. The alternative/secondary access routes would be required to be maintained throughout construction and buildout of the Project. Additionally, the Project would be subject to the fire code standards established as part of Riverside County Ordinance No. 787 (Fire Code Standards).

Nonetheless, development of the proposed Project would impact fire services by placing an additional demand on existing County Fire Department resources and personnel. In accordance with the Riverside County Fire Protection Master Plan, a new fire station and/or appropriate fire company is required for the development of 2,000 dwelling units or more. The Project proposes the development of 694 dwelling units, and as such, the Project would not result in the need for a new fire station in the local area. The Project would result in an increased number of emergency and public service calls due to the increased presence of structures, traffic, and residents. Although new fire protection facilities ultimately may be needed in the Project area to serve the Project and other future development in the area, it is not possible to identify environmental impacts that may be associated with the development of any new fire protection facilities until a specific proposal and design for the facility is prepared by the RCFD. Accordingly, impacts due to the construction of new or expanded fire protection facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such fire protection facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded fire protection facilities.

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

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

The Project would result in an estimated population increase of approximately 2,115 residents based on a rate of 3.17 persons per household for the Project's 614 typical single-family and multi-family dwelling units and a rate of 2.11 pph for the Project's proposed 80 age-restricted residential units ([614 du x 3.17 pph] + [80 du x 2.11] = 2,115.2 persons) (Riverside County, 2021a, Appendix E, Table E-2). The Project's incremental increase in population in the Project area could result in an increase in demand for police protection services and an associated increase in criminal activity such as burglaries, thefts, auto thefts, vandalism, and other incidents. However, according to the Riverside County Sheriff's Department (RCSD), there is not a direct correlation between population growth, crime rates, and the number of personnel needed. Nonetheless, increased service demand typically requires additional staffing and equipment resources to maintain existing service levels.

The proposed Project would incrementally contribute to the cumulative demand for law enforcement services provided by the RCSD. Based on a service standard of 1.5 sworn officers per 1,000 population as specified by Riverside County EIR No. 521, which was prepared for the County's 2015 General Plan Update, the Project would generate a demand for approximately 3.2 new sworn officers (2,115 residents x 1.5 officers/1,000 residents = 3.2 officers) (Riverside County, 2015, Table 4.17-H). Supporting staff such as civilian personnel, investigators, and supervisory staff would also be needed to maintain appropriate service levels. However, the Project would not, in and of itself, result in the need for new or physically expanded sheriff facilities.

The Project would be subject to Riverside County Ordinance No. 659, which requires payment of a Development Impact Fee (DIF) to assist the County in funding law enforcement services, including new or expanded facilities. Payment of this fee ensures that funds are available for capital improvements such as land acquisition, equipment purchases, and construction of new sheriff department facilities. Accordingly, Project-related impacts to sheriff protection services are considered less than significant, and no mitigation beyond payment of DIF fees would be required.

Therefore, implementation of the Project would not result in the need for new or expanded sheriff facilities. The Project's incremental demand for police protection services would be addressed through compliance with existing County funding mechanisms, and impacts would be less than significant.

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

Although the Project would result in the future development of up to 694 residential dwelling units, 80 of the proposed units would be age-restricted and are not expected to generate a student-aged population. The remaining 614 dwelling units (non-age-restricted) could reasonably be expected to generate school-aged children. Development of these units would increase the local population and place greater demand on the public school system, including facilities operated by the Menifee Union School District (MUSD) and the Perris Union High School District (PUHSD).

As shown in Table 4.16-1, *Project-Related Student Generation*, and based on the student generation rates provided in the MUSD 2023/2024 Residential and Commercial/Industrial Development School Fee Justification Study and the student generation rates cited by Riverside County EIR No. 521 for the PUHSD, the Project would generate an estimated 147 elementary school students (K–6) and 45 middle school students (grades 7–9) within the MUSD, and 151 high school students (grades 10–12) within the PUHSD. In total, the Project would generate approximately 343 students. (Riverside County, 2015, Table 4.17-R; MUSD, 2024, Table 3)

**Table 4.16-1 Project-Related Student Generation**

| School District | School Type | Grades Served | Student Generation Rate[1,2] | Dwelling Units[3] | Project-Generated Students |
|---|---|---|---|---|---|
| MUSD | Elementary School | K-6 | 0.30 students/SFR<br>0.14 students/MFR | 384 SFR<br>230 MFR | 115.2<br>32.2 |
| | Middle School | 7-9 | 0.08 students/SFR<br>0.06 students/MFR | 384 SFR<br>230 MFR | 30.7<br>13.8 |
| PUHSD | High School | 10-12 | 0.246 students/du | 614 du | 151.0 |
| | | | **Totals:** | **614 du** | **342.9 students** |

1. Student Generation Rate data for the MUSD was taken from Table 3 of the MUSD *2023/2024 Residential and Commercial/Industrial Development School Fee Justification Study* (MUSD, 2024).
2. Student Generation Rate data for the PUHSD was taken from Riverside County EIR No. 521, as no current Developer Fee Justification Study is available on line for the PUHSD.
3. Dwelling units exclude the 80 age-restricted HDR dwelling units that would not generate a student population.

Notes: MUSD = Menifee Union School District; PUHSD = Perris Union High School District; du = dwelling units; SFR = single-family residential dwelling units; MFR = multi-family dwelling units.
(Riverside County, 2015, Table 4.17-R; MUSD, 2024, Table 3)

Based on the scale of the proposed Project, there is potential that existing elementary, middle, and high schools within the Project vicinity may not have adequate capacity to accommodate all new students generated by the Project. New school facilities or attendance boundary adjustments may be needed to either serve future students generated by the Project, or to shift attendance boundaries to free up capacity at one or all of the schools that may serve the Project. Although the MUSD and/or PUHSD may need to

construct new school facilities to meet the growing demand within this portion of unincorporated Riverside County, there are no current publicly-available plans detailing where such facilities would be built. Although the Project may cause or contribute to the need for new or expanded school facilities, it is not possible to identify environmental impacts that may be associated with the construction of new or expanded school facilities until a specific proposal and design for the facility is prepared by the applicable school district, and an analysis of potential physical environmental impacts resulting from the construction and operation of new or expanded school facilities would be speculative in nature (see State CEQA Guidelines § 15145). Environmental effects of such school facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded school facilities. Any mitigation measures required for new or expanded school facilities could be funded, in part, from property taxes and/or through payment of school impact fees (as discussed below).

Although it is not possible to identify physical environmental effects that may result from new or expanded school facilities, the Project would be required to contribute school impact fees to the MUSD and PUHSD in accordance with Riverside County Ordinance No. 575. Pursuant to the Leroy F. Greene School Facilities Act of 1998, payment of school impact fees constitutes full and complete mitigation for project-related impacts to school services. Although the Project's demand for school services likely would not be accommodated by existing facilities or staffing levels, mandatory payment of school impact fees still would be required and would ensure that the Project's impacts to school facilities and services would be less than significant.

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

Development of the proposed Project would increase the region's population, creating additional demand for library facilities and services. The Project would result in an estimated population increase of approximately 2,115 residents based on a rate of 3.17 persons per household for the Project's 614 typical single-family and multi-family dwelling units and a rate of 2.11 pph for the Project's proposed 80 age-restricted residential units ([614 du x 3.17 pph] + [80 du x 2.11] = 2,115.2 persons) (Riverside County, 2021a, Appendix E, Table E-2; NAHB, n.d., Figure I-2).

Although the widespread use of the internet has contributed to a reduced reliance on traditional library services nationwide, the County of Riverside continues to maintain its adopted service standards for library volumes and square footage. Library services in the County are provided by the Riverside County Public Library System (RCLS). To meet the RCLS level of service standard of 2.5 volumes per capita, the Project-generated population would require approximately 5,288 additional volumes (2.5 × 2,115 residents). To meet the standard of 0.5 square feet of library space per capita, the Project would create demand for approximately 1,058 square feet of additional library space (0.5 × 2,115 residents) (Riverside County, 2015, Table 4.17-W).

Development of the Project would incrementally contribute to an existing deficiency in library service standards. The need for additional library volumes and space would be addressed through the County's implementation of adopted level-of-service standards. In addition, the Project would be subject to Riverside County Ordinance No. 659, which requires the payment of Development Impact Fees (DIF). These fees are used to fund the acquisition of new books and materials, as well as the construction or expansion of library facilities.

Although new or expanded library facilities may be needed to serve cumulative growth within the County, there are currently no publicly available plans specifying the location, timing, or scope of such improvements. Accordingly, potential environmental impacts associated with the development of new or expanded library facilities are considered too speculative for evaluation in this EIR pursuant to CEQA Guidelines § 15145. Any future library development would undergo its own CEQA review process. Potential mitigation for such facilities could be funded in part through property tax revenue, including increases associated with Project buildout. As such, Project impacts to library facilities and resources would be less than significant.

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

The nearest medical facility to the Project site is the Riverside Medical Clinic located at 33040 Antelope Road in Murrieta. The Project would result in an estimated population increase of approximately 2,115 residents based on a rate of 3.17 persons per household for the Project's 614 typical single-family and multi-family dwelling units and a rate of 2.11 pph for the Project's proposed 80 age-restricted residential units ([614 du x 3.17 pph] + [80 du x 2.11] = 2,115.2 persons) (Riverside County, 2021a, Appendix E, Table E-2; NAHB, n.d., Figure I-2). Based on these generation factors, the Project would generate the need for approximately 4 additional hospital beds (2,115 residents × 1.9 beds / 1,000 persons = 4.02 beds).

The provision of private health care services is largely based on economic factors and demand and is generally outside the scope of CEQA. However, EIR No. 521 concluded that impacts associated with buildout of the General Plan would be less than significant, and further notes that: "compliance with…existing General Plan policy and existing Mitigation Measures 4.15.7A and 4.15.7B from EIR No. 441, would further reduce or avoid the insignificant impacts…" (Riverside County, 2015, p. 4.17-18). Mitigation Measure 4.15.7A requires the County to perform periodic medical needs assessments to evaluate the current medical demand and level of medical service provided within each Area Plan every three years. Mitigation Measure 4.15.7B requires the County to fund the new construction and/or expansion of existing medical facilities according to the level of demand for medical services based on the needs assessment required as part of Mitigation Measure 4.15.7A.

Furthermore, mandatory compliance with County Ordinance No. 659 requires payment of a Development Impact Fee (DIF) that is partially allocated to public health services and facilities. While new or expanded

health care facilities may ultimately be needed in the County due to cumulative population growth, the potential environmental impacts associated with such facilities cannot be assessed at this time. In accordance with State CEQA Guidelines § 15145, such impacts are considered too speculative for evaluation in this EIR. As such, impacts to public medical facilities and services associated with the proposed Project would be less than significant.

### 4.16.5 Cumulative Impact Analysis

The cumulative study area for public services encompasses the service areas of the Riverside County Fire Department (RCFD), Riverside County Sheriff's Department (RCSD), Menifee Union School District (MUSD), Perris Union High School District (PUHSD), and the Riverside County Public Library System (RCLS), and assumes full buildout of the General Plans for jurisdictions within these service areas.

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

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

The proposed Project would generate approximately 343 school-age children, and thus would result in an increase in demand for school services. The proposed Project, when considered in conjunction with on-going development throughout the service area for the MUSD and PUHSD would cumulatively affect the ability of these school districts to provide school services. However, the Project and all cumulative developments would be required to contribute fees to these school districts in accordance with Riverside County Ordinance No. 575. Pursuant to the Leroy F. Greene School Facilities Act of 1998, payment of school impact fees constitutes complete mitigation for project-related impacts to school services. Therefore, although the Project's impacts to school services would be cumulatively considerable, cumulatively-considerable impacts would be less than significant with contribution of mandatory school impact fees.

The proposed Project, when considered in conjunction with on-going development throughout western Riverside County, would cumulatively affect the ability of the RCLS to serve the local community with library services. It is not possible to identify environmental impacts that may be associated with such new or expanded library facilities until a specific proposal and design for such facilities are prepared by the RCLS. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such library facilities and associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded library facilities. However, the Project and all cumulative developments would contribute property taxes and would be required to contribute DIF fees to Riverside County pursuant to County Ordinance No. 659, which could be used for the purpose of acquiring book titles and/or additional library square footage. Any mitigation measures required for new or expanded library facilities also could be funded, in part, from property taxes allocated by Riverside County to such purposes. Therefore, because environmental impacts associated with new or expanded library facilities cannot be known at this time and would be determined in the future once Riverside County identifies a specific proposal for new or expanded library facilities, Project impacts to library services and facilities are evaluated as less than significant on a cumulatively-considerable basis.

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

### 4.16.6 Significance of Impacts Before Mitigation

Threshold a: Less-than-Significant Impact. With payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Fire Department would be reduced to less-than-significant levels, and the Project would not result in or require the construction of new fire protection facilities that could result in a significant impact to the environment.

Threshold b: Less-than-Significant Impact. With payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Sheriff's Department would be reduced to less-than-significant levels, and the Project would not result in or require the construction of new police protection facilities that could result in a significant impact to the environment.

Threshold c: Less-than-Significant Impact. The Project would generate approximately 343 students based on applicable student generation rates. Although the Menifee Union School District (MUSD) and Perris Union High School District (PUHSD) may need to construct new school facilities to meet growing demand within this part of Riverside County, the payment of mandatory school impact fees would ensure that the Project

does not result in significant direct or cumulatively considerable impacts to the ability of MUSD and/or PUHSD to provide adequate school services. As such, Project impacts would be less than significant.

Threshold d: Less-than-Significant Impact. Although the Project would contribute to a need for new or expanded library facilities, the Project would be required to contribute DIF fees, which would be used in part to provide for library space and/or new book volumes. Accordingly, with payment of DIF fees, Project impacts to library services and facilities are evaluated as less than significant on both a direct and cumulatively-considerable basis.

Threshold e: Less-than-Significant Impact. With payment of mandatory DIF fees, the Project would result in less-than-significant direct and cumulatively-considerable impacts to health services facilities, and the Project would not result in or require the construction of new health services facilities that could result in a significant impact to the environment.

## 4.16.7 Regulations, Design Requirements, and Mitigation

***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.

- As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety. Among other items, these requirements include conformance with the Uniform Building Code Section 1503, which requires that all buildings be constructed with fire retardant roofing material, as well as standard Riverside County Fire Department conditions of approval (COAs) for specific plans, which prohibit flag lots and require alternative/secondary access routes to neighborhoods. The alternative/secondary access routes would be required to be maintained throughout construction and buildout of the proposed Project.

- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for fire protection facilities (including fire stations), sheriff protection facilities (including sheriff stations), library facilities, and health facilities.

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

- The Project is required to comply with Riverside County Ordinance No. 787, which adopts the California Fire Code and adds requirements that help ensure that buildings have adequate emergency access for fire safety personnel, equipment and apparatus, and do not hinder evacuation from fire, including potential blockage of stairways or fire doors.

***Mitigation***

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

## 4.16.8 References


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# 4.17 RECREATION

This Subsection provides an overview of the existing parks and recreational facilities that exist within the Project vicinity and that could potentially be directly or indirectly physically affected by implementation of the proposed Project. The analysis herein is based in part on the Riverside County General Plan Multipurpose Open Space Element and Healthy Communities Element (Riverside County, 2021a). Refer to Section 7.0, *References*, for a complete list of reference sources.

## 4.17.1 Existing Conditions

### A. Federal Parks

The only federal park within the Project vicinity is the San Bernardino National Forest, located approximately 12.0 miles east of the Project site. The San Bernardino National Forest spans both Riverside and San Bernardino Counties. Of the National Forest's 823,816 total acres, approximately 241,600 acres occur within Riverside County, in three discontinuous locations (223,980 acres, 17,453 acres and 167 acres, respectively). The U.S. Forest Service manages this resource. (Riverside County, 2015, pp. 4.16-2)

### B. State Parks

There are no State parks within the Project vicinity. The nearest State Park is the Lake Perris State Recreation Area, located approximately 14.5 miles northwest of the Project site. The Lake Perris State Recreation Area comprises 9,615 acres and provides recreational activities such as hiking, horseback riding, camping and bird watching as well as numerous recreational water activities on Lake Perris. (Riverside County, 2015; Google Earth, 2025)

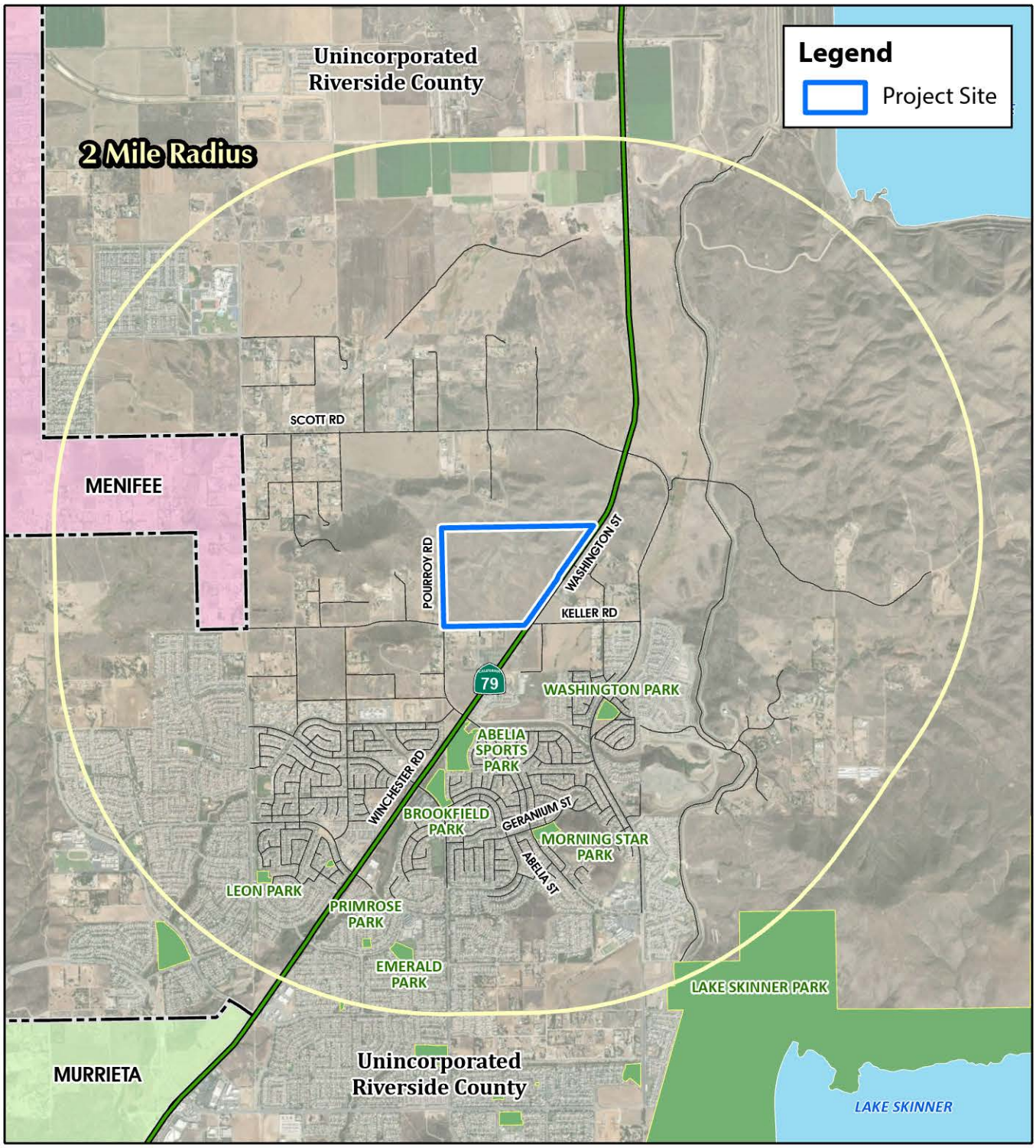
### C. Regional and Local Parks

Several regional and local parks occur within a two-mile radius of the Project site. These facilities are depicted on Figure 4.17-1, *Existing Local and Regional Recreation Facilities*, and are described below:

- **Washington Park**. Washington Park is a local park and is located approximately 0.6 mile southeast of the Project site. This facility features one full ball field, two basketball courts, one soccer field, an open play field, a playground, and picnic areas. (Google Earth, 2025)

- **Abelia Sports Park.** Abelia Sports Park is a local park and is located approximately 0.6 mile south of the Project site. This facility includes two full ball fields, a lighted field, one soccer field, a tennis/pickle ball combo court, two basketball courts, one volleyball court, an open play field, a playground, and picnic areas. (Google Earth, 2025)

- **Brookfield Park.** Brookfield Park is a local park located approximately 0.9 mile south of the Project site. This facility includes one full ball field, one soccer field, two basketball courts, one volleyball court, an open play field, a playground, and picnic areas. (Google Earth, 2025)




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.

Figure 4.17-1

0 1,000 2,000 4,000 Feet

Existing Local and Regional Recreation Facilities

- **Leon Park.** Leon Sports Park is a local park managed by the Valley Wide Parks and Recreation District (VWPRD) and is located approximately 1.6 miles southwest of the Project site. This facility includes two half-court basketball courts, two playgrounds, and picnic areas. (Google Earth, 2025)

- **Morning Star Park**. Morning Star Park is located at the southwest corner of Geranium Street and Abelia Street, approximately 1.0 mile south of the Project site, and includes a tot lot, two half-court basketball area, and open play fields. (Google Earth, 2025)

- **Emerald Park**. Emerald Park is located east of the intersection of Algarve Avenue and Emerald Drive, approximately 1.7 miles southwest of the Project site, and includes a tot lot, half-court basketball area, a baseball diamond, and an open play area. (Google Earth, 2025)

- **Primrose Park**. Primrose Park is located north of the intersection of McCartney Drive and Cloche Drive, approximately 1.7 mile southwest of the Project site, and includes a tot lot, shaded picnic area, and an open play field. (Google Earth, 2025)

#### D. Regional and Local Trails

The Southwest Area Plan (SWAP) identifies the County's long-term objectives for recreational trails and bikeways within the Project area. As shown on Figure 8 of the SWAP, there are proposed Community Trails along Leon Road, Keller Road, and Pourroy Road and a proposed regional trail along Abelia Street. (Riverside County, 2021b, Figure 8)

### 4.17.2 Applicable Regulatory Requirements

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

#### A. State Regulations

##### *1. Mitigation Fee Act*

The California Mitigation Fee Act, Government Code Sections 66000, et seq., allows cities to establish fees imposed on development projects for the purpose of mitigating the impact that the projects have on the city's ability to provide specified public facilities. In order to comply with the Mitigation Fee Act, a city must follow four primary requirements: 1) Make certain determinations regarding the purpose and use of a fee and stablish a nexus or connection between a development project or class of project and the public improvement being financed with the fee; 2) Segregate fee revenue from the General Fund in or to avoid commingling of capital facilities and general funds; 3) For fees that have been in possession of the city for five years or more and for which the dollars have not been spent or committed to a project, the city must make findings each fiscal year describing the continuing need for the money; and 4) Refund any fees with interest for developer deposits for which the findings noted above cannot be made.

#### *2. California Public Park Preservation Act*

The primary instrument for protecting and preserving parkland in the state is California's Public Park Preservation Act of 1971. Under Public Resources Code Sections 5400 - 5409, cities and counties may not acquire any real property that is in use as a public park for any nonpark use unless compensation, land, or both, are provided to replace the parkland acquired. This ensures no net loss of parkland and facilities.

#### *3. Quimby Act, California Government Code § 66477*

The State of California's Quimby Act was established by the California Legislature for the purpose of preserving open space and providing park facilities for California's growing communities. The Quimby Act allows local agencies to establish ordinances requiring residential subdivisions to provide land or "in-lieu-of" fees for park and recreation purposes. This State Act requires the dedication of land and/or imposes a requirement of fees for park and recreational purposes as a condition of approval of tentative tract map or parcel map.

### B. Local Regulations

#### *1. Riverside County Ordinance No. 460*

Riverside County Ordinance No. 460 establishes the key provisions addressing the division of land in Riverside County. Among other things, in Section 10.35 (Park and Recreation Fees and Dedications), it specifies that: "Whenever land that is proposed to be divided for residential use lies within the boundaries of a public agency designated to receive dedications and fees pursuant to this section, a fee and/or the dedication of land shall be required as a condition of approval of the division of land." It further specifies that dedication of 3 acres of parkland per 1,000 population, or payment of a fee in-lieu of such dedication, is necessary for the "public interest, convenience, health, welfare and safety." The fee and/or land dedications or improvements can only be used to provide neighborhood and community parks that would serve the proposed development. (Riverside County, 2015, pp. 4.16-17)

#### *2. Valley-Wide Recreation and Park District Master Plan*

The VWRPD adopted a Master Plan in 2020 in order to provide a guide for the VWRPD for future years. The VWRPD Master Plan sets goals for future parks and recreation development by examining existing needs within the community. The plan also provides population growth generation numbers, along with the park standard of providing five acres of parkland for every 1,000 residents. Because the proposed Project is located within the VWRPD, the Project would dedicate parkland or pay fees to the VWRPD based on the standards identified in the VWRPD Master Plan. (VWRPD, 2025, Exhibit 1)

## 4.17.3 Basis for Determining Significance

According to Section XVI of Appendix G to the CEQA Guidelines, the proposed Project would result in a significant impact to recreation if the Project or any Project-related component would:

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

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

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

a. *Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

b. *Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

c. *Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?*

d. *Include the construction or expansion of a trail system?*

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 on parks and recreation.

### 4.17.4 Impact Analysis

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

The Project Applicant proposes a total of 8.88 acres of "Open Space – Recreation (OS-R)" land uses as part of the Project. Additionally, and as previously depicted on EIR Figure 3-5, a 10-foot-wide decomposed meandering concrete trail is proposed along the northern edge of Keller Road, an 8-foot-wide curb-separated sidewalk is proposed along the site's frontage with Winchester Road, and 5-foot sidewalks are proposed along major internal roadways. The physical construction of the on-site recreational facilities is addressed under the relevant issue areas identified throughout this EIR (e.g., air quality, biological resources, cultural resources). Under each relevant topic, the Project's impacts are determined to be less than significant, or mitigation measures are identified to reduce impacts to the maximum feasible extent. There are no components of the proposed recreational facilities that would result in physical environmental impacts that have not already been addressed and accounted for throughout this EIR. Accordingly, Project

impacts related to parkland development on-site would be less than significant, requiring no mitigation beyond that which is identified in other portions of the EIR.

| | |
|---|---|
| **Threshold b:** | **Would the Project include the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?** |
| **Threshold c:** | **Is the Project located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?** |

The Project site is within the boundaries of the Valley-Wide Recreation and Park District (VWRPD), which most recently updated its Master Plan in June 2025. The Master Plan establishes a standard of 5.0 acres of parkland per 1,000 residents. It should be noted that the VWRPD uses a different persons-per-household (pph) value than that identified in the Riverside County General Plan. However, for consistency with the VWRPD Master Plan, the population generation rates used by VWRPD have been applied herein to estimate the Project's parkland demand.

Based on the VWRPD Master Plan, the District assumes a population generation factor of 3.51 persons per dwelling unit for single-family detached units and 3.02 persons per dwelling unit for multi-family units with 2-4 units per structure. However, the VWRPD Master Plan does not specify a factor for age-restricted high-density dwelling units. Population associated with the Project's age-restricted housing component has been estimated using an average persons-per-household figure of 2.11, based on the National Association of Home Builders (NAHB) publication, "Approving 55+ Housing: Facts That Matter." (NAHB, n.d., Figure I-2)

As shown in Table 4.17-1, *Anticipated Project Parkland Demand*, the Project's 384 single-family detached dwelling units would generate an estimated population of 1,348 persons, the Project's 230 non-age-restricted multifamily dwelling units would generate an estimated population of 695 persons, while the 80 age-restricted HDR units would generate an estimated population of 169 persons, for a total of approximately 2,211 residents. Applying the Valley-Wide Recreation and Park District (VWRPD) parkland standard of 5.0 acres per 1,000 residents, the Project would generate a demand for approximately 11.07 acres of parkland. The Project proposes a total of 8.88 acres of "Open Space – Recreation" (OS-R) land uses. Accordingly, the Project would fall slightly short of the Project's 11.07-acre parkland demand by approximately 2.19 acres.

However, the VWRPD Master Plan indicates that developments that do not meet their parkland demand on site may pay fees in lieu of dedication, consistent with the requirements of Riverside County Ordinance No. 460. The Project's proposed 8.88 acres of OS-R land uses would meet the recreational demands for approximately 526 of the Project's 694 total dwelling units (([384 single-family households x 3.51 pph] + [142 multi-family households x 3.02 pph]) x 5.0 acres/1,000 persons = 8.88 acres), but would not meet the parkland demands for the remaining +/- 168 dwelling units. Thus, pursuant to the VWRPD Master Plan and Riverside County Ordinance No. 460, the Project Applicant would be required to contribute in-lieu fees for the remaining +/- 168 dwelling units for which adequate parkland is not accommodated on site. Table 3 of

**Table 4.17-1 Anticipated Project Parkland Demand**

| Proposed Land Use | Proposed Dwelling Units | Persons per Household (pph) | Estimated Project Population | Project Parkland Demand (5 acres/ 1,000 persons)[1] |
|---|---|---|---|---|
| Single-Family Detached | 384 | 3.51 | 1,348 | 6.74 acres |
| Multi-Family (2-4 units/structure) | 230 | 3.02 | 695 | 3.48 acres |
| Age-Qualified High-Density Residential | 80 | 2.11 | 169 | 0.85 acres |
| **Totals:** | **694** | **--** | **2,211** | **11.07 acres** |

1. Totals reflect rounding.
(VWRPD, 2025, Appendix E, Table 2; NAHB, n.d., Figure I-2)

the VWRPD Master Plan identifies the in-lieu fee cost for single-family and multi-family dwelling units. With mandatory payment of in-lieu park fees for the Project's deficit of approximately 2.19-acre of parkland pursuant to the VWRPD Master Plan and Riverside County Ordinance No. 460, the Project's impacts due to substantial physical deterioration of the park facilities would be reduced to less-than-significant levels. In addition, mandatory payment of fees pursuant to Riverside County Ordinance No. 460 and based upon the rates specified by the VWRPD Master Plan would ensure that the Project fully complies with both the VWRPD Master Plan and Riverside County Ordinance No. 460. Therefore, with mandatory payment of fees, Project impacts to existing parkland facilities off site and due to a conflict with a community parks and recreation plan would be reduced to less-than-significant levels.

### 4.17.5 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within 2.0 miles of the Project site. This cumulative study area was selected due to people's tendency to utilize community recreation facilities near where they reside. The study area also includes portions of the VWRPD Master Plan boundaries, because the Project has a potential to conflict with the VWRPD standard of 5.0 acres of parkland per 1,000 persons, which could represent a cumulatively-considerable impact.

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

As discussed under the analysis of Thresholds b. and c., the Project would fall slightly short of the Project's 11.07-acre parkland demand by approximately 2.10 acres. However, the Project and other cumulative developments would be required to contribute in-lieu fees for any parkland deficiencies in accordance with the requirements of Riverside County Ordinance No. 460 and/or the VWRPD Master Plan. As such, the Project's contribution to off-site recreational demand would be adequately addressed through both land dedication and fee-based mechanisms, and cumulatively-considerable impacts related to the physical deterioration of existing off-site recreational resources would be less than significant.

## 4.17.6 Significance of Impacts Before Mitigation

Thresholds a and d: Less-than-Significant Impact. The physical construction of the on-site recreational facilities has been addressed under the relevant issue areas identified throughout this EIR (e.g., air quality, biological resources, cultural resources). Under each of these topics, Project impacts are determined to be less than significant, or mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no components of the planned recreational facilities on site that have not already been addressed and accounted for throughout this EIR. Accordingly, Project impacts due to parkland development on site would be less than significant, requiring no mitigation beyond that which is identified in other portions of this EIR.

Thresholds b. and c.: Less-than-Significant Impact. As calculated based on the VWRPD Master Plan, the Project would generate a future population of approximately 2,211 residents, which would result in a demand for 11.07 acres of parkland. The Project accommodates a total of 8.88 acres of recreational uses (park) on site; thus, the Project would fall short of the VWRPD Master Plan standard of 5.0 acres of parkland per 1,000 residents by approximately 2.19 acres. However, the Project's proposed 8.88 acres of OS-R land uses would meet the recreational demands for approximately 526 of the Project's 694 total dwelling units. Pursuant to the VWRPD Master Plan and Riverside County Ordinance No. 460, the Project Applicant would be required to contribute in-lieu fees for the remaining +/- 168 dwelling units for which adequate parkland is not accommodated on site. With mandatory payment of in-lieu park fees for the Project's deficit of approximately 2.19-acre of parkland pursuant to the VWRPD Master Plan and Riverside County Ordinance No. 460, the Project's impacts due to substantial physical deterioration of the park facilities would be reduced to less-than-significant levels. In addition, mandatory payment of fees pursuant to Riverside County Ordinance No. 460 and based upon the rates specified by the VWRPD Master Plan would ensure that the Project fully complies with both the VWRPD Master Plan and Riverside County Ordinance No. 460. Therefore, with mandatory payment of fees, Project impacts to existing parkland facilities off site and due to a conflict with a community parks and recreation plan would be reduced to less-than-significant levels.

## 4.17.7 Regulations, Design Requirements, and Mitigation

### *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 would be required to comply with Section 10.35 (Park and Recreation Fees and Dedications) of Riverside County Ordinance No. 460, which specifies in-lieu fees for parkland dedication. Pursuant to Section I.7.a.of Section 10.35 of Ordinance No. 460, payment of in-lieu fees "…shall be based either on the fair market value of the land which would otherwise be required or on a fixed in-lieu fee rate set forth in the approved [Community Parks and Recreation] Plan." The Project is located within a portion of the County for which a Community Parks and Recreation Plan has been adopted (i.e., the VWRPD Master Plan). Table 3 (In-Lieu Fees per Unit) of Appendix E to the VWRPD Master Plan (Quimby Park – In-Lieu Fee Report) specifies a per-unit fee for single family and multi-family dwelling units. Because the 8.88 acres of on-site parkland would be adequate to meet the demand of 526 of the Project's 694 total dwelling units, the Project Applicant would be required to pay the multi-family in-lieu fee specified by Table 3 of Appendix E to the VWRPD Master Plan for the +/- 168 multi-family dwelling units for which adequate parkland would not be accommodate on site. The actual number of units for which in-lieu fees would be required shall be calculated at the time of building permits, as there is a potential that a portion of the Project's parkland demand could be met through recreational amenities within proposed multi-family Planning Area 5 of Specific Plan No. 380, Amendment No. 1.

***Mitigation***

Impacts would be less than significant; therefore, mitigation is not required.

## 4.17.8 References


| Cited As | Reference |
|---|---|
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# 4.18 TRANSPORTATION

The following analysis is based on two technical reports prepared by Urban Crossroads, Inc. The first report addresses the Project's impacts due to Vehicle Miles Traveled (VMT), is titled, "Keller Crossing Specific Plan No. 380 Amendment No. 1 Vehicle Miles Travelled (VMT) Analysis" (herein, "VMT Analysis"), is dated April 3, 2025, and is included as *Technical Appendix L1* to this EIR (Urban Crossroads, 2025f). The second report evaluates the Project's impacts due to traffic congestion, is titled, "Keller Crossing TTM No. 38163 Traffic Analysis" (herein, "TA"), is dated May 8, 2026, and is included as *Technical Appendix L2* to this EIR (Urban Crossroads, 2026g). The TA evaluates the potential operating deficiencies of transportation facilities in the proposed Project's Study Area and identifies improvements that would be needed to relieve operational deficiencies. Refer to Section 7.0, *References,* for a complete list of reference sources.

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

## 4.18.1 Existing Conditions

### A. Existing Vehicle Miles Traveled

VMT is obtained from the Riverside Transportation Analysis Model (RIVTAM) model using the Production/Attraction (PA) method for calculating VMT, which sums all weekday VMT generated by trips with at least one trip end in the study area (i.e., Project's Traffic Analysis Zone [TAZ]). Productions are land use types that generate trips (residences) and attractions are land use types that attract trips (employment). For the County of Riverside, the countywide average VMT per capita is noted in the County's "Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled Guidelines" ("County Guidelines") as 15.2 VMT per capita. (Urban Crossroads, 2025f, p. 3)

### B. Existing Transportation System

Under existing conditions, the approximately 196.1-acre Project site is located at the northwest corner of the intersection of Keller Road at Winchester Road (SR-79). Pursuant to the Southwest Area Plan (SWAP) and Riverside County General Plan Circulation Element, Winchester Road (SR-79) is classified as an "Expressway" with a planned right-of-way (ROW) ranging from 184 to 220 feet in width and containing between 6 to 8 travel lanes. Keller Road is classified as a "Secondary Street," with a 100 feet of ROW and a typical cross-section that includes a 64-foot curb-to-curb measurement. Other roadways in the Project area and that are identified by the General Plan Circulation Element include Scott Road, Benton Road, and

Clinton Keith Road, which are classified as "Urban Arterials" (152-foot ROW); Max Gilliss Boulevard and Leon Road are classified as "Major Roadways" (118-foot ROW); and Pourroy Road (south of Keller Road), Whisper Heights Parkway, Thompson Road, and Auld Road are classified as "Secondary Streets." (Urban Crossroads, 2026g, pp. 27, 31)

#### C. Transit Service

The Project area is currently served by Riverside Transit Agency (RTA), and includes Route 61 which runs along portions of Winchester Road and Keller Road. The bus route for Route 61 is illustrated on Exhibit 3-9 of the Project's TA (*Technical Appendix L2)*. Transit service is reviewed and updated by RTA periodically to address ridership, budget, and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. (Urban Crossroads, 2026g, p. 33)

#### D. Bicycle and Pedestrian Facilities

The County of Riverside, City of Menifee, and City of Murrieta bike networks are shown on Exhibits 3- 5, 3-6, and 3-7 of the Project's TA (*Technical Appendix L2)*. As shown on Exhibit 3-5 of the Project's TA, there is a proposed Regional Trail (Urban/Suburban) proposed in the vicinity of the Project site, although this planned Regional Trail does not abut the Project site. Exhibit 3-8 of the Project's TA illustrates the existing crosswalks throughout the study area. As shown on Exhibit 3-8 of the Project's TA, there are limited pedestrian facilities in place in the vicinity of the Project site. (Urban Crossroads, 2026g, p. 33)

### 4.18.2 Applicable Regulatory Requirements

#### A. State Plans, Policies, and Regulations

##### *1. Assembly Bill 1358 – Complete Streets Act*

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

### *2. Statewide Transportation Improvement Program (STIP)*

The Statewide Transportation Improvement Program (STIP) is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the Transportation Investment Fund and other funding sources. STIP programming generally occurs every two years. The programming cycle begins with the release of a proposed fund estimate in July of odd-numbered years, followed by California Transportation Commission (CTC) adoption of the fund estimate in August (odd years). The fund estimate serves to identify the amount of new funds available for the programming of transportation projects. Once the fund estimate is adopted, Caltrans and the regional planning agencies prepare transportation improvement plans for submittal by December 15th (odd years). Caltrans prepares the Interregional Transportation Improvement Plan (ITIP) and regional agencies prepare Regional Transportation Improvement Plans (RTIPs). Public hearings are held in January (even years) in both northern and southern California. The STIP is adopted by the CTC by April (even years).

### *3. Senate Bill 743*

SB 743, which was codified in Public Resources Code Section 21099, required changes to the CEQA Guidelines regarding the analysis of transportation impacts. Pursuant to Public Resources Code Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." To that end, in developing the criteria, the OPR proposed, and the CNRA certified and adopted changes to the CEQA Guidelines in December 2018, which entailed changes to the thresholds of significance for the evaluation of impacts to transportation. The updated CEQA Guidelines include the addition of CEQA Guidelines Section 15064.3, of which subsection "b" establishes criteria for evaluating a project's transportation impacts based on project type and using automobile VMT as the metric.

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

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

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

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

## B. Regional Regulations

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

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code Section 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. On September 3, 2020, SCAG adopted the 2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) ("RTP/SCS"; also referred to herein as "Connect SoCal") with goals to: 1) build and maintain an integrated multimodal transportation network; 2) develop, connect and sustain communities that are livable and thriving; 3) create a healthy region for the people of today and tomorrow; and 4) support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP.

Connect SoCal includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. Connect SoCal is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

### *2. Riverside County Congestion Management Program (CMP)*

The intent of a Congestion Management Program (CMP) is to directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related deficiencies, and improve air quality. The County of Riverside CMP became effective with the passage of Proposition 111 in 1990 and was most recently updated in 2019 as part of the Riverside County Long Range Transportation Study. The Riverside County Transportation Commission (RCTC) adopted the 2019 CMP for the County of Riverside in December 2019. There are no study area intersections identified as a Riverside County CMP intersection. (Urban Crossroads, 2026g, p. 8)

## C. Western Riverside County Association of Governments Transportation Uniform Mitigation Fee

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

Committee in July 2017. The updated Nexus Study continues to demonstrate the relationship between the TUMF fee levels and the cost of anticipated improvements to the Regional System of Highways and Arterials (RSHA) necessitated by new development throughout western Riverside County.

### D. Local Regulations

Riverside County ordinances specifically applicable to the circulation system are presented below:

- Ordinance No. 413 – Vehicle Parking: Ordinance No. 413 establishes regulations to vehicle parking on Riverside County roadways.
- Ordinance No. 452 – Speed Limits: Ordinance No. 452 pertains to prima facie speed limits on Riverside County roadways and establishes or amends prima facie speed limits on certain Riverside County roads.
- Ordinance No. 460 – Subdivision of Land: Ordinance No. 460, in conjunction with the Subdivision Map Act, establishes regulations for the division of land and describes procedures. The ordinance also includes the provisions for the establishment of Road and Bridge Benefit Districts and associated fees.
- Ordinance No. 461 – Road Improvement Standards and Specifications: Ordinance No. 461 adopts Road Improvement Standards and Specifications.
- Ordinance No. 499 – Encroachments in County Highways: Ordinance No. 499, subject to the control of the Board of Supervisors, delegates to the Riverside County Transportation Director the administration of the use of county highways, including county roads, for excavations and encroachments; construction, operation, and maintenance of utility facilities; planting, maintenance, and removal of trees; and the issuance, modification, and revocation of permits for such uses.
- Ordinance No. 659 – Development Mitigation Fee for Residential Development (DIF Program): Ordinance No. 659 establishes a development impact fee (DIF) for the development of infrastructure, including County roadways and the installation of traffic signals.
- Ordinance No. 671 – Consolidated Fees for Land Use and Related Functions: Ordinance No. 671 establishes a consolidated fee program for land use and related functions. This is a deposit-based fee program and provides for unused fees to be refunded to the applicant.
- Ordinance No. 748 – Mitigation of Traffic Congestion Through Signalization: Ordinance No. 748 establishes a fee program for the installation of traffic signals based on a priority list. The fee would also have a component for the installation of traffic signal interconnect, and a component for the application of intelligent transportation systems technologies.
- Ordinance No. 824 – Western Riverside County Transportation Uniform Mitigation Fee (TUMF) Program: Ordinance No. 824 establishes a TUMF program for western Riverside County. The fees are collected by Riverside County and administered by WRCOG to make roadway improvements in the WRCOG area. TUMF funds are intended for use solely for the engineering, construction, and right-

of-way acquisition for regional facilities. TUMF funds may not be used to defray operational and maintenance expenses. Facilities eligible for TUMF are designated by WRCOG and updated periodically. They include streets, arterials, and road improvements as defined in the ordinance.

### 4.18.3 Basis for Determining Significance

#### A. Threshold of Significance

*According to Section XVII of Appendix G to the CEQA Guidelines, the proposed Project would result in a significant impact to transportation and traffic if the Project or any Project-related component would:*

- *Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;*
- *Conflict with or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b);*
- *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)l or*
- *Result in inadequate emergency access or access to nearby uses?*

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

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

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

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

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

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

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

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

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

## B. Thresholds of Significance for Vehicle Miles Traveled (VMT)

### *1. Project Level Screening*

The County Guidelines state that a project may be determined to have a less-than-significant impact and screen from the need to prepare a project-level VMT analysis if it meets one or more eligible screening criteria. The County's adopted VMT screening criteria are described in Table 4.18-1, *Screening for Land Use Projects Exempt from VMT Calculations*, along with a determination of each screening criteria's applicability to the Project. As shown, the Project does not meet any of the screening criteria. As such, a Project-specific analysis of potential impacts to VMT was conducted. (Urban Crossroads, 2025f, pp. 1-2)

**Table 4.18-1 Screening for Land Use Projects Exempt from VMT Calculations**

| Screening Criteria | Description | Result |
|---|---|---|
| Small Projects | Projects that generate fewer than 110 daily vehicle trips or projects that are below 3,000 Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$) per year. | **Does not meet.** |
| High Quality Transit Areas (HQTA) | High quality transit provides a viable option for many to replace automobile trips with transit trips resulting in an overall reduction in VMT. | **Does not meet.** |
| Local Serving Retail | The introduction of new Local-serving retail has been determined to reduce VMT by shortening trips that will occur. | **Not Applicable.** |
| Affordable Housing | Lower-income residents make fewer trips on average, resulting in lower VMT overall. | **Does not meet.** |
| Local Essential Service | As with Local-Serving Retail, the introduction of new Local Essential Services shortens non-discretionary trips by putting those goods and services closer to residents, resulting in an overall reduction in VMT. | **Not Applicable.** |
| Map-Based | This method eliminates the need for complex analyses, by allowing existing VMT data to serve as a basis for the screening of smaller developments. Note that screening is limited to residential and office projects. | **Does not meet.** |
| Redevelopment Project | Projects with lower VMT than existing on-site uses, can under limited circumstances, be presumed to have a non-significant impact. In the event this screening does not apply, projects should be analyzed as though there is no existing uses on site (project analysis cannot take credit for existing VMT). | **Not Applicable.** |

(Urban Crossroads, 2025f, Table 1)

### *2. VMT Significance Threshold*

As outlined in the County Guidelines and confirmed in the Project's VMT Analysis (*Technical Appendix L1*), residential land uses are evaluated using the applicable County threshold for VMT per capita. Pursuant to the County Guidelines, residential land uses should be evaluated on the efficiency metric of VMT per capita. The County Guidelines indicate that a residential project would result in a significant project-generated VMT impact if the project's VMT per capita exceeds the existing countywide average VMT per capita. As stated in the County Guidelines, the Riverside Countywide average VMT per capita is 15.2. (Urban Crossroads, 2025f, p. 3)

### C. Methodology for Estimating VMT

As of the time of study preparation, the County Guidelines continue to identify the Riverside Transportation Analysis Model (RIVTAM) as the appropriate tool for conducting VMT analysis for land development projects in unincorporated Riverside County. RIVTAM estimates VMT based on interaction between different land uses from socio-economic data such as population, households, and employment. RIVTAM is a travel demand forecasting model that represents a sub-area (Riverside County) of the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP) Traffic Model. RIVTAM was designed to provide a greater level of detail and sensitivity in the Riverside County area as compared to the regional SCAG model. (Urban Crossroads, 2025f, p. 2)

For the purposes of analysis, project-generated VMT is estimated using the Production/Attraction (PA) method. Consistent with County Guidelines, VMT has been presented as home-based (HB) VMT per capita. HB VMT per capita is an efficiency metric representing VMT generated exclusively from HB trips on a typical weekday per resident. County Guidelines note that VMT per capita should be used to evaluate residential projects (i.e., single family, multi-family housing). (Urban Crossroads, 2025f, p. 2)

The Production/Attraction (PA) method for calculating VMT sums all weekday VMT with at least one trip-end in the study area (i.e., Project Traffic Analysis Zone) by trip purpose. Productions are land use types that generate trips (residences), and attractions are land use types that attract trips (employment). The PA method allows project VMT to be evaluated based on trip purpose, which is consistent with both the Office of Planning and Research (OPR) Technical Advisory and County Guidelines. Although the PA matrices do not include external trips that have one trip-end outside of the model boundary, the County Guidelines require an additional step in the calculation procedures to account for external trips. (Urban Crossroads, 2025f, p. 3)

## 4.18.4 Impact Analysis

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

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

❑ **Connect SoCal**

As previously noted, SCAG has published a 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), referred to as "Connect SoCal." Connect SoCal seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the

residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal are pertinent to the proposed Project. These goals are meant to provide guidance for considering the proposed Project within the context of regional goals and policies. An analysis of the Project's consistency with the relevant goals of Connect SoCal previously was presented in Table 4.11-2 in EIR Subsection 4.11, *Land Use and Planning*. As indicated in EIR Table 4.11-2, the Project would not conflict with any Connect SoCal goals, and no impact would occur.

### ❑ Riverside County Congestion Management Program

The intent of a Congestion Management Program (CMP) is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related deficiencies, and improve air quality. The County of Riverside CMP became effective with the passage of Proposition 111 in 1990 and most recently updated in 2019 as part of the Riverside County Long Range Transportation Study. The Riverside County Transportation Commission (RCTC) adopted the 2019 CMP for the County of Riverside in December 2019. There are no study area intersections identified as a Riverside County CMP intersection (Urban Crossroads, 2026g, p. 8). Accordingly, the Project would not result in a conflict with the Riverside County CMP and impacts would be less than significant.

### ❑ Riverside County General Plan Circulation Element

The Riverside County General Plan Circulation Element establishes several goals and policies related to transportation network that are applicable to development projects. As indicated in the analysis presented in the Project's General Plan Consistency Analysis, included as EIR *Technical Appendix O*, the Project would not conflict with any applicable policies or requirements of the Riverside County General Plan Circulation Element, including policies and requirements related to transit, roadway, bicycle, and pedestrian facilities. Accordingly, impacts due to a conflict with the General Plan Circulation Element would be less than significant.

### ❑ Riverside County Ordinances

The Project would be subject to compliance with all applicable Riverside County ordinances addressing the circulation system, including, but not limited to, Riverside County Ordinance Nos. 413, 452, 460, 461, 499, 659, 671, 748, and 824. Because compliance with County ordinances is mandatory and would be assured through future County review of grading and/or building permit applications, the Project has no potential to conflict with any County ordinances addressing the circulation system. Accordingly, impacts due to a conflict with County ordinance would be less than significant.

### ❑ Conclusion

As indicated above, the proposed Project would be consistent with or otherwise would not conflict with the SCAG 2024-2050 RTP/SCS, the Riverside County CMP, Riverside County ordinances, and the Circulation Element policies of the Riverside County General Plan. There are no other applicable programs, plans, ordinances, or policies addressing the circulation system in effect in the Project area. Accordingly, Project

impacts due to a conflict with a program, plan, ordinance or policy addressing the circulation system would be less than significant requiring no mitigation.

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

As previously noted, changes to the State CEQA Guidelines were adopted in December 2018, which require all lead agencies to adopt VMT as a replacement for automobile delay-based LOS as the measure for identifying transportation impacts for land use projects. This Statewide mandate went into effect July 1, 2020, consistent with Senate Bill 743 (SB 743). To comply with SB 743, the County of Riverside adopted their "Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled" ("County Guidelines"). The adopted County Guidelines have been utilized to evaluate the Project's potential impacts due to VMT. (Urban Crossroads, 2025f, p. 1)

As previously noted, the County Guidelines state that a project may be determined to have a less-than-significant impact and screen from the need to prepare a project-level VMT analysis if it meets one or more eligible screening criteria. However, as previously shown in Table 4.18-1, the Project does not meet any of the screening criteria. As such, a Project-specific analysis of potential impacts to VMT was conducted. (Urban Crossroads, 2025f, pp. 1-2)

As stated previously, for residential land uses the efficiency metric VMT per capita is used to evaluate the Project's potential impacts due to VMT. VMT per capita is calculated by first obtaining Home-Based (HB) VMT from the Production/Attraction matrices and skim distance matrices and then dividing by the Project's population (i.e., residents) from the RIVTAM base year model. In addition, to calculate daily trips that originate or have destinations in areas outside of the County (external trips), a calibrated average trip length was applied to Project TAZ 4080 and multiplied by the number of external trips to and from that TAZ to determine the total external VMT generated by the Project TAZ 4080. Table 4.18-2, *Project VMT per Capita*, presents baseline PA HB VMT, resulting in baseline PA HB VMT per capita values for the Project, and a comparison to the County's significance threshold of 15.2 VMT per capita. As shown in Table 4.18-2, the Project's VMT per capita is estimated at 32.2, which exceeds the County's Threshold of Significance by approximately 211.8%. Accordingly, Project impacts due to VMT would represent a significant impact for which mitigation would be required. (Urban Crossroads, 2025f, p. 4)

As noted by County Guidelines, projects that cannot mitigate baseline project-generated VMT to a level below the County's impact threshold should also include a supplemental cumulative analysis. Similar to the baseline analysis, the County Guidelines requires that residential land uses be evaluated utilizing the

**Table 4.18-2 Project VMT per Capita**

| Input | Baseline |
|---|---|
| Population | 2,116 |
| PA HB VMT | 68,135 |
| VMT Per Capita | 32.2 |
| County Threshold | 15.2 |
| **Exceeds Threshold?** | **Yes** |

(Urban Crossroads, 2025f, Table 3)

efficiency metric PA HB VMT per capita utilizing the cumulative year model. Table 4.18-3, *Cumulative Plus Project VMT per Capita*, presents cumulative PA HB VMT, resulting in cumulative PA HB VMT per capita values for the Project, and a comparison to the County's significance threshold of 15.2 VMT per capita. Consistent with baseline VMT analysis results, the cumulative Project-generated VMT per capita shown in Table 4.18-3 also would exceed the County's impact threshold. Thus, Project impacts due to Cumulative plus Project VMT per Capita would represent a significant impact of the proposed Project for which mitigation would be required. (Urban Crossroads, 2025f, p. 5)

**Table 4.18-3 Cumulative Plus Project VMT per Capita**

| Inputs | Cumulative |
|---|---|
| Population | 2,116 |
| PA HB VMT | 59,036 |
| VMT per Capita | 27.9 |
| County Threshold | 15.2 |
| **Exceeds Threshold?** | **Yes** |

(Urban Crossroads, 2025f, Table 4)

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

The Project would involve residential development within an area that is characterized and/or planned for a mixture of residential and commercial retail uses interspersed with open space. As such, the land uses proposed by the Project would not comprise an incompatible use with existing and planned land uses in the surrounding area. During the County's review process for the Project's proposed SP 380A1 and Tentative Tract Map No. 38163 (TTM 38163), the County reviewed the proposed design plans to ensure that no hazardous roadway features would be implemented. In fact, the Project would result in the realignment of the Keller Road/Winchester Road (Highway 79) intersection, which would ensure that Keller Road intersects with Winchester Road at an approximate 90-degree angle, rather than the skewed intersection configuration that occurs under existing conditions. It is anticipated that the westbound leg of this intersection also may be improved in the future by others to provide a similar 90-degree angle, although such improvements are not proposed as part of the Project. Accordingly, the proposed Project would not create or substantially increase safety hazards due to a geometric design feature or incompatible use. Impacts associated with this issue would be less than significant.

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

Implementation of the proposed Project would generate traffic along local roadways, and therefore would incrementally increase the need for maintenance of local roadway facilities. Although the Project would result in the increased maintenance of roadways and would increase traffic on existing and planned roadways, any incremental increase in the need to maintain public roadway facilities would be offset by tax revenue generated by the Project's proposed land uses. There are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, Project impacts would be less than significant.

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

The Project has the potential to adversely affect local circulation during construction activities along Keller Road and during frontage improvements to Winchester Road (Highway 79). To account for potential temporary disruptions to traffic flow, these impacts are conservatively evaluated as significant. Mitigation would be required in the form of a construction-period traffic control plan for implementing developments affecting Keller Road and Winchester Road.

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

Under long-term operating conditions, the Project would have no effect on emergency access in the local area, and impacts would be less than significant. However, during proposed improvements to Keller Road along the Project frontage, there is a potential that the Project could adversely affect emergency access or access to nearby uses. This is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan for implementing developments.

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

No construction or expansion of facilities for bicycles is proposed as part of the Project, although proposed improvements to Keller Road, Winchester Road, and other on-site roadways could accommodate bicycle lanes. Impacts associated with proposed improvements to roadways have been evaluated throughout this EIR, and impacts were determined to be less than significant or would be reduced to less-than-significant levels with the incorporation of mitigation measures. As such, the Project would not include the construction or expansion of a bike system or bike lanes that could result in physical environmental impacts not already addressed by this EIR, and impacts would therefore be less than significant.

### 4.18.5 Cumulative Impact Analysis

Cumulative impacts associated with transportation were largely evaluated in the preceding subsection 4.18.4. A summary of the impacts identified therein is provided below. Direct impacts are identified in subsection 4.18.4 and are not discussed below.

As discussed under the analysis of Threshold a., future development on site would be required to comply with all applicable Riverside County ordinances related to the circulation system. In addition, EIR *Technical Appendix P* demonstrates that with approval of the Project's proposed General Plan Amendment No. 210004, the proposed Project would not conflict with any applicable policies of the General Plan or SWAP, including policies within the General Plan Circulation Element and policies within the SWAP that relate to the circulation system, transit, roadway, bicycle, and/or pedestrian facilities. The Project also would be consistent with or otherwise would not conflict with SCAG's 2024-2050 RTP/SCS or the Riverside County CMP. Other cumulative projects similarly would be required to comply with all applicable ordinances, and would be required to comply with all applicable General Plan and SWAP policies (or the policies of the general plans of cities within the Project's Study Area). Impacts would be less-than-cumulatively considerable.

As indicated under the analysis of Threshold b., and as shown in Table 4.18-2, the VMT per capita for the Project's proposed residential uses would exceed the County's threshold of significance by 211.8%. In addition, and as shown in Table 4.18-3, the Project when considered in the context of cumulative developments, would exceed the County's threshold of significance of 15.2 VMT per capita by approximately 183.6%. Other cumulative developments within the Project region also have the potential to exceed the County's thresholds of significance for VMT. Accordingly, the Project's impacts due to VMT would be cumulatively considerable.

As indicated under the analysis of Threshold c, the Project would involve residential development within an area that is characterized and/or planned for a mixture of residential uses interspersed with open space and circulation facilities. As such, the land uses proposed by the Project would not comprise an incompatible use with existing and planned land uses in the surrounding area. Additionally, during the County's review process for the Project's proposed Specific Plan Amendment No. 380A1 and Tentative Tract Map No. 38163, the County reviewed the proposed design plans to ensure that no hazardous roadway features would be implemented. Other cumulative developments would similarly be required to demonstrate that no hazards would occur due to incompatible land uses or due to a geometric design feature or roadway design. As such, cumulatively-considerable impacts would be less than significant.

As indicated under the analysis of Threshold d., there are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, cumulatively-considerable impacts would be less than significant.

As indicated under the analysis of Threshold e, the Project has the potential to adversely affect circulation in the local area during construction of Keller Road through the Project site and during frontage improvements along Winchester Road. There is also potential for other cumulative developments in the vicinity to be under construction concurrently, which could further impact traffic on local roadways, including Keller Road. Both the Project and nearby cumulative projects would be required to implement appropriate traffic control measures during construction to avoid significantly disrupting the circulation

system. However, in the absence of such mitigation, the Project's construction-related impacts would be considered cumulatively considerable.

As indicated under the analysis of Threshold f., under long-term operating conditions, the Project would have no effect on emergency access in the local area, and impacts would be less than significant. However, during proposed improvements to Keller Road along the Project frontage, there is a potential that temporary lane closures that may occur during the Project's construction phase could overlap with construction activities associated with cumulative developments. Although it is anticipated a less-than-significant impact would occur, out of an abundance of caution, a significant temporary impact is identified. Accordingly, impacts would be cumulatively-considerable prior to mitigation.

As discussed under the analysis of Threshold g., no construction or expansion of facilities for bicycles is proposed as part of the Project, although proposed improvements to Keller Road, Winchester Road, and other on-site roadways could accommodate bicycle lanes. Impacts associated with proposed roadway improvements have been evaluated throughout this EIR, and cumulatively-considerable impacts were determined to be less than significant or would be reduced to less-than-significant levels with the incorporation of mitigation measures. As such, the Project would not result in any cumulatively-considerable impacts due to the construction or expansion of a bike system or bike lanes.

### 4.18.6 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. The proposed Project would be consistent with or otherwise would not conflict with the goals, policies, and/or requirements of the SCAG 2024-2050 RTP/SCS, the Riverside County CMP, the Riverside County General Plan Circulation Element, and all applicable County ordinances that address the circulation system. Accordingly, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, and impacts would be less than significant.

Threshold b: Significant Direct and Cumulatively Considerable Impact. Buildout of the residential uses proposed as part of the Project would result in a VMT per capita of 32.2, which exceeds the County's VMT per capita threshold of significance of 15.2 by approximately 211.8 percent. In addition, the cumulative Project-generated VMT per capita would be approximately 27.9, which would exceed the County's impact threshold of 15.2 by approximately 183.6%. As such, prior to mitigation, the proposed Project would result in a significant direct and cumulatively considerable impact related to VMT.

Threshold c.: Less-than-Significant Impact. The Project would not substantially increase hazards due to a geometric design feature or due to incompatible land uses. Impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. Although the Project would result in the increased maintenance of roadways and would increase traffic on existing and planned roadways, any incremental increase in the need to maintain public roadway facilities would be offset by tax revenue generated by the Project's proposed land uses. There are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, Project impacts would be less than significant.

Threshold e.: Significant Direct and Cumulatively-Considerable Impact. The Project has the potential to adversely impact circulation in the local area during the construction of Keller Road through the Project site, and during construction of frontage improvements along Winchester Road. The Project's potential impacts to circulation along Keller Road and/or Winchester Road during construction is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan for implementing developments affecting Keller Road or Winchester Road.

Threshold f.: Significant Direct and Cumulatively-Considerable Impact. During proposed improvements to Keller Road along the Project frontage, there is a potential that the Project could adversely affect emergency access or access to nearby uses. This is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan for implementing developments.

Threshold g.: Less-than-Significant Impact. No construction or expansion of facilities for bicycles is proposed as part of the Project, aside from bicycle facilities that could be accommodated along Keller Road, Winchester Road, and along on-site roadways. Impacts associated with proposed improvements to roadways have been evaluated throughout this EIR, and impacts were determined to be less than significant or would be reduced to the maximum feasible extent with the incorporation of mitigation measures.

### 4.18.7 Regulations, Design Requirements, and Mitigation

***Regulations and Design Requirements***

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

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

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

- Prior to final building inspection for each phase of the proposed Project, the Project Applicant shall construct the improvements identified in Table 1-3 of the Project's Traffic Analysis (*Technical Appendix L2* to this EIR).

- Prior to final building inspection for each phase of the proposed Project, the Project Applicant shall make fair-share contributions towards required transportation improvements, in accordance with Table 1-3 of the Project's Traffic Analysis (*Technical Appendix L2* to this EIR).

***Mitigation***

MM 4.18-1 Prior to the issuance of grading permits or improvement plans affecting public roadways, the Project Applicant shall prepare and Riverside County shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices (CMUTCD). A requirement to comply with the temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors.

## 4.18.8 Significance of Impacts After Mitigation

Threshold b: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Although the Project includes pedestrian and bicycle infrastructure such as trails, bike lanes, and sidewalks that support non-vehicular travel and contribute to internal trip reduction. Additionally, the Project has been designed to include a minimum 13-foot-wide curb-adjacent sidewalk along the Project site's frontage with Winchester Road in lieu of a 3-foot-wide curb-adjacent landscape strip and 8-foot-wide curb-separated sidewalk, which the RTA has determined would be adequate to accommodate a future bus stop. Notwithstanding, these features are not sufficient to reduce the Project's VMT per capita to a level below the County's significance threshold. As detailed in the Project's VMT Analysis (*Technical Appendix L1*), the Project would result in a residential VMT per capita of 32.2, which would exceed the County's 15.2 VMT per capita threshold by approximately 211.8% percent. When considered in the context of cumulative development, the Project would result in a VMT per capita of 27.9, which would exceed the County's threshold of significance of 15.2 VMT per capita by 183.6%.

As required by the County Guidelines, transportation demand management (TDM) strategies should be considered for the purpose of reducing VMT impacts, which are determined to be potentially significant. The effectiveness of TDM strategies to reduce VMT as described by County Guidelines are derived from the Quantifying Greenhouse Gas Mitigation Measures prepared by CAPCOA. However, subsequent to the adoption of County Guidelines, CAPCOA has recently publish an update to their VMT reduction measure guidance titled, "Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity" (herein, "2024 Handbook"), which now supersedes the previous CAPCOA document. This 2024 Handbook has instead been used for this assessment.

Consistent with VMT reduction measures described within the 2024 Handbook, the following Project-related design features have been incorporated into the Project and could contribute towards a small reduction in Project-generated VMT:

- Provide pedestrian and bicycle network improvements within the development connecting to existing off-site facilities.
- Where applicable, ensure design of key intersections and roadways encourage the use of walking, biking, and transit.

- Collaborate with the Riverside Transit Authority (RTA) to determine the feasibility of providing new or re-routing existing transit services to the site.

Based on the results of this analysis, a 52.8% reduction in Project-generated HB VMT would be needed to achieve a less than significant impact under Project conditions, and a reduction in Project-generated VMT of 45.5% would be needed to reduce the cumulative plus Project VMT to below the County's threshold of 15.2. However, due to the scale of application and location of the Project, the addition of the aforementioned design features would likely result in a modest decrease (under 5%) in VMT and be unable to reduce Project-generated VMT below the County's impact threshold. Accordingly, because the Project would not meet any of the County Guidelines screening criteria, and because the PA HB VMT per capita would exceed the County's VMT impact threshold for both baseline and cumulative conditions, even with the inclusion of feasible design features intended to reduce project-generated VMT, Project impacts due to VMT represent a significant and unavoidable impact for which mitigation is not available.

Threshold e.: Less-than-Significant Impact with Mitigation Incorporated. Mitigation Measure MM 4.18-1 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits or improvement plans affecting public roadways. Implementation of the required mitigation would ensure that Project-related construction activities would not substantially affect circulation during the Project's construction. With implementation of the required mitigation, impacts would be reduced to less-than-significant levels.

Threshold f.: Less-than-Significant Impact with Mitigation Incorporated. Mitigation Measure MM 4.18-1 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits. With implementation of the required mitigation, the Project would not result in inadequate emergency access or access to nearby uses during the Project's construction phase. Accordingly, with implementation of the required mitigation, impacts would be reduced to less-than-significant levels.

## 4.18.9 References


| Cited As | Reference |
|---|---|
| Urban Crossroads, 2025f | Urban Crossroads, 2025. *Keller Crossing Specific Plan 380 Amendment No. 1, TTM No. 38163 Vehicle Miles Traveled (VMT) Analysis*. April 3, 2025. Included as *Technical Appendix L1* to this EIR. |
| Urban Crossroads, 2025g | Urban Crossroads, Inc., 2025. *Keller Crossing TTM No. 38163 Traffic Analysis.* April 7, 2025. Included as *Technical Appendix L2* to this EIR. |

# 4.19 TRIBAL CULTURAL RESOURCES

The analysis in this Subsection documents the results of the County's consultation with local Native American Tribes. It should be noted that much of the written and oral communication between Native American tribes and Riverside County is considered confidential in respect to places that have traditional tribal cultural significance (Gov. Code § 65352.4), and although relied upon in part to inform the preparation of this EIR Subsection, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs. § 15120(d)).

## 4.19.1 Existing Conditions

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

## 4.19.2 Regulatory Setting

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

## 4.19.3 Applicable Regulatory Requirements

### A. Federal Regulations

*1. American Indian Religious Freedom Act*

The American Indian Religious Freedom Act (AIRFA) requires each executive branch agency with statutory or administrative responsibility for the management of Federal lands shall, to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and avoid adversely affecting the physical integrity of such sacred sites. Where appropriate, agencies also are required to maintain the confidentiality of sacred sites. Each executive branch agency with statutory or administrative responsibility for the management of Federal lands is required to implement procedures to ensure reasonable notice is provided of proposed actions or land management policies that may restrict future access to or ceremonial use of, or adversely affect the physical integrity of, sacred sites.

*2. Native American Graves Protection and Repatriation Act (NAGPRA)*

The Native American Graves Protection and Repatriation Act (NAGPRA; Public Law 101-601; 25 U.S.C. 3001-3013) describes the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation.

One major purpose of this statute is to require that federal agencies and museums receiving Federal funds inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items. The agencies and museums must consult with Indian Tribes and Native Hawaiian organizations to attempt to reach agreements on the repatriation or other disposition of these remains and objects. Once lineal descent or cultural affiliation has been established, and in some cases the right of possession also has been demonstrated, lineal descendants, affiliated Indian Tribes, or affiliated Native Hawaiian organizations normally make the final determination about the disposition of cultural items. Disposition may take many forms from reburial to long term curation, according to the wishes of the lineal descendent(s) or culturally affiliated Tribe(s).

The second major purpose of the statute is to provide greater protection for Native American burial sites and more careful control over the removal of Native American human remains, funerary objects, sacred objects, and items of cultural patrimony on Federal and tribal lands. NAGPRA requires that Indian tribes or Native Hawaiian organizations be consulted whenever archaeological investigations encounter, or are expected to encounter, Native American cultural items or when such items are unexpectedly discovered on Federal or tribal lands. Excavation or removal of any such items also must be done under procedures required by the Archaeological Resources Protection Act. This NAGPRA requirement is likely to encourage the in-situ preservation of archaeological sites, or at least the portions of them that contain burials or other kinds of cultural items.

Other provisions of NAGPRA: (1) stipulate that illegal trafficking in human remains and cultural items may result in criminal penalties; (2) authorizes the Secretary of the Interior to administer a grants program to assist museums and Indian Tribes in complying with certain requirements of the statute; (3) requires the Secretary of the Interior to establish a Review Committee to provide advice and assistance in carrying out key provisions of the statute; (4) authorizes the Secretary of the Interior to penalize museums that fail to comply with the statute; and, (5) directs the Secretary to develop regulations in consultation with this Review Committee.

*3. Federal Antiquities Act*

The Antiquities Act is the first law to establish that archaeological sites on public lands are important public resources. It obligates federal agencies that manage the public lands to preserve for present and future generations the historic, scientific, commemorative, and cultural values of the archaeological and historic sites and structures on these lands. It also authorizes the President to protect landmarks, structures, and objects of historic or scientific interest by designating them as National Monuments.

## B. State Regulations

*1. California Administrative Code, Title 14, Section 4308*

California Administrative Code Title 14, Section 4308, *Archaeological Features*, provides that: “No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value.”

*2. California Code of Regulations Title 14, Section 1427*

California Code of Regulations Title 14, Section 1427 provides that: "No person shall collect or remove any object or thing of archaeological or historical interest or value, nor shall any person injure, disfigure, deface or destroy the physical site, location or context in which the object or thing of archaeological or historical interest or value is found."

*3. Traditional Tribal Cultural Places Act (SB 18)*

Senate Bill 18 (SB 18) requires local (city and county) governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places ("cultural places") through local land use planning. SB 18 also requires the Governor's Office of Planning and Research (OPR) to include in the General Plan Guidelines advice to local governments for how to conduct these consultations.

The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government.

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code § 65300 et seq.) and specific plans (defined in Government Code § 65450 et seq.). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, existing state planning law requires local governments to use the same processes for adoption and amendment of specific plans as for general plans (see Government Code § 65453). Therefore, where SB 18 requires consultation and/or notice for a general plan adoption or amendment, the requirement extends also to a specific plan adoption or amendment.

*4. Assembly Bill 52 (AB 52)*

California Assembly Bill 52 (AB 52) (2014) Chapter 532 amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved on September 25, 2014. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process.

The Public Resources Code now establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." (Pub. Resources Code, § 21084.2.) To help determine whether a project may have

such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (Pub. Resources Code, § 21080.3.1.)

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. Public Resources Code Section 21084.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources. These rules apply to projects that have a notice of preparation for an environmental impact report or negative declaration or mitigated negative declaration filed on or after July 1, 2015.

Public Resources Code Section 21074 defines "tribal cultural resources." In brief, in order to be considered a "tribal cultural resource," a resource must be either:

(1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or

(2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource.

In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources. In applying those criteria, a lead agency must consider the value of the resource to the tribe.

*5. State Health and Safety Code*

California Health and Safety Code (HSC) Section 7050.5(b) requires that excavation and disturbance activities must cease "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery…" until the coroner can determine regarding the circumstances, manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the code makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. Section 7051 specifies that the removal of human remains from "internment or a place of storage while awaiting internment" with the intent to sell them or to dissect them with "malice or wantonness" is a public offense punishable by imprisonment in a state prison. Lastly, HSC Sections 8010-8011 establish the California Native American Graves Protection and Repatriation Act consistent with the federal law addressing the same. The Act stresses that "all California Indian human remains and cultural items are to be treated with dignity and respect." It encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California. It also outlines the need for aiding California Indian tribes, including non-federally recognized tribes, in filing repatriation claims.

*6. California Code of Regulations Section 15064.5*

The California Code of Regulations, Title 14, Chapter 3, Section 15064.5 (the State CEQA Guidelines) establishes the procedure for determining the significance of impacts to archaeological and historical resources, as well as classifying the type of resource. Cultural resources are aspects of the environment that require identification and assessment for potential significance. The evaluation of cultural resources under CEQA is based upon the definitions of resources provided in CEQA Guidelines Section 15064.5, as follows:

- *A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, § 4850 et seq.).*

- *A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.*

- *Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, § 4852) including the following:*

    - *Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;*

    - *Is associated with the lives of persons important in our past;*

    - *Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or*

    - *Has yielded, or may be likely to yield, information important in prehistory or history.*

- *The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.*

### 4.19.4 Basis for Determining Significance

According to Section XVIII of Appendix G to the CEQA Guidelines, the proposed Project would result in a significant impact to tribal resources if the Project or any Project-related component would:

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

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

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

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

## 4.19.5 Impact Analysis

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

Changes in the California Environmental Quality Act, effective July 2015, require that the County address a new category of cultural resources, tribal cultural resources, not previously included within the law's purview. Tribal Cultural Resources are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as cultural landscapes or sacred places. The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

Senate Bill 18 (SB18) also called the Traditional Tribal Cultural Places bill was signed into law September of 2004 and took effect March 1, 2005. SB 18 refers to PRC §5097.9 and 5097.993 which defines cultural places as Native American sanctified cemetery place of worship, religious or ceremonial site, or sacred shrine (PRC §5097.9), and Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historic Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC §5097.993). SB 18 established responsibilities for local governments to contact, provide notice to, refer plans to, and consult with California Native American Tribes that have been identified by the NAHC and if that tribe requests consultation after local government outreach as stipulated in Government Code (GC) §65352.3. The purpose of this consultation process is to protect the identity of the cultural place and to develop appropriate and dignified treatment of the cultural place in any subsequent project. The consultation is required whenever a general plan, specific plan, or open space designation is proposed for adoption or to be amended. In addition to the requirements stipulated above, SB 18 amended GC §65560 to "allow the protection of cultural places in open space element of the general plan" and amended Civil Code §815.3 to add "California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places."

As part of the application process, California Native American Tribes must be given the opportunity to consult with the County for the purpose of preserving, mitigating impacts to, and identifying cultural places located on Project land.

On May 17, 2021, a Sacred Lands File Search and consultation list request was sent to the Native American Heritage Commission. A response was received June 1, 2021, with a list of 17 contacts and the results of the Sacred Lands File Search which was negative.

Notices were sent to all contacts on June 2, 2021. The Quechan Tribe responded in an email dated June 2, 2021, deferring to closer tribe. The Rincon Band requested consultation in a letter dated June 29, 2021. The Agua Caliente Band of Cahuilla Indians requested consultation in a letter dated June 30, 2021, Pechanga responded on July 29, 2021, requesting consultation. No response was received from the remaining tribes.

In compliance with Assembly Bill 52 (AB52), notices regarding this Project were mailed to all requesting tribes on June 14, 2021, and August 11, 2021. No response was received from the Ramona Band, the Cahuilla Band of Indians, the Morongo, the Colorado River Indian Tribes, the Santa Rosa Band or the Pala Band of Mission Indians.

Consultation was requested by the Agua Caliente Band of Cahuilla Indians, Soboba Band of Indians, the Pechanga Band of Luiseno Indians and the Rincon Band of Luiseno Indians.

Soboba Band responded in an email dated March 22, 2021. This Project was discussed during a meeting on June 09, 2021. Soboba provided information that the Project location is in proximity to known sites, is a shared use area that was used in ongoing trade between the tribes, and is considered to be culturally sensitive by the people of Soboba. Furthermore, the Project is in a National Register TCP Landscape. The cultural report and the conditions of approval were provided to the tribe on August 24, 2021. Consultation was concluded on September 08, 2021.

The Rincon Band responded in an email letter dated February 26, 2021 and requested consultation in a letter dated June 29, 2021. The cultural report was provided to the tribe on August 24, 2021. Rincon provided information that the Project location is within the Traditional Use Area (TUA) of the Luiseño people and within the Band's specific Area of Historic Interest (AHI). As such, Rincon is traditionally and culturally affiliated with the Project area. The cultural report was provided to the tribe. After reviewing the cultural report, the band provided recommendations for archaeological and tribal monitoring during grading activities. Consultation was concluded on September 30, 2021.

The Pechanga Band of Luiseno Indians responded in an email letter dated July 16, 2021, requesting consultation. Pechanga told Planning that the Project area is part of 'Ataaxum (Luiseño), and therefore the Tribe's, aboriginal territory as evidenced by the existence of cultural resources, named places, tóota yixélval (rock art, pictographs, petroglyphs), and an extensive 'Ataaxum artifact record in the vicinity of the Project. This culturally sensitive area is affiliated with the Pechanga Band of Luiseño Indians because of the Tribe's cultural ties to this area. Consultation was initiated on February 17, 2021, and the Project was discussed

during meetings on September 15, 2021, and October 08, 2021. During this meeting the tribe provided information regarding the sensitivity of the area although nothing specific about this particular property, the band told Planning that nearby is the "place the little people went over the hill". Although the ground has been disturbed, Pechanga feels there is still the potential for grading into native soils and the band recommended that a tribal monitor be present during grading activities. They also requested that an area be identified for reburial of any artifacts that may be identified during grading. This was completed and consultation was concluded on December 13, 2021.

Although no specific Tribal Cultural Resources were identified, all the consulting tribes expressed concerns that the Project has the potential for as yet unidentified subsurface tribal cultural resources. The tribes request that a Native American monitor be present during ground disturbing activities so any unanticipated finds will be handled in a timely and culturally appropriate manner.

Based on information provided by the consulting tribes this Project will require a Native American Monitor to be present during ground disturbing activities. Prior to the issuance of grading permits, the developer/permit applicant shall enter into agreement(s) for Native American Monitor(s). The Project will also be required to adhere to State Health and Safety Code Section 7050.5 in the event that human remains are encountered and by ensuring that no further disturbance occurs until the County Coroner has made the necessary findings as to origin of the remains. Furthermore, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made.

CEQA requires the Lead Agency to address any unanticipated cultural resources discoveries during Project construction. Therefore, a condition of approval that dictates the procedures to be followed should any unanticipated cultural resources be identified during ground disturbing activities has been placed on the Project.

With the inclusion of these Conditions of Approval/mitigation measures, impacts to any previously unidentified Tribal Cultural Resources would be less than significant.

### 4.19.6 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within western Riverside County. This study area was selected for evaluation because it encompasses a broad region with similar geological, biological, and climatic conditions.

As indicated under the analysis of Threshold a., although no specific Tribal Cultural Resources were identified, the Project would be subject to compliance with EIR Mitigation Measures MM 4.5-1 through MM 4.5-7, which were identified to address the Project's potential impacts to historical resources. In particular, Mitigation Measure MM 4.5-1 requires the Project Applicant to retain a qualified archaeologist to monitor site grading, while Mitigation Measure MM 4.5-2 requires full-time monitoring of Project grading activities by a Native American monitor. Mandatory compliance with EIR Mitigation Measures MM 4.5-1 through MM 4.5-

7 would ensure that Project impacts to tribal cultural resources would be less than significant on a cumulatively-considerable basis.

## 4.19.7 Significance of Impacts Before Mitigation

Threshold a.: Significant Direct and Cumulatively Considerable Impact. Although no known Tribal Cultural Resources were identified on the Project site, local tribal representatives consulted under AB 52 indicated that the site is within an area of cultural sensitivity and requested tribal monitoring during ground-disturbing activities. As such, the potential exists for previously undocumented TCRs to be encountered, and this impact is considered potentially significant absent mitigation.

## 4.19.8 Regulations, Design Requirements, and Mitigation

***Regulations and Design Requirements***

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

- 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.

***Mitigation***

Mitigation Measures MM 4.5-1 through MM 4.5-7 shall apply (refer to EIR Subsection 4.5, Cultural Resources). The mitigation measures included in EIR Subsection 4.5 have been drafted to include all of the mitigation requirements requested during the Project's Tribal Consultation process. No additional mitigation measures are required.

## 4.19.9 Significance of Impacts After Mitigation

Threshold a.: Less-than-Significant Impact with Mitigation Incorporated. Although no specific Tribal Cultural Resources were identified, the Project would be subject to compliance with EIR Mitigation Measures MM 4.5-1 through MM 4.5-7, which were identified to address the Project's potential impacts to historical resources. In particular, Mitigation Measure MM 4.5-1 requires the Project Applicant to retain a qualified archaeologist to monitor site grading, while Mitigation Measure MM 4.5-2 requires full-time monitoring of Project grading activities by a Native American monitor. Mandatory compliance with EIR Mitigation Measures MM 4.5-1 through MM 4.5-7 would ensure that Project impacts to tribal cultural resources would be less than significant.

# 4.20 UTILITIES AND SERVICE SYSTEMS

The analysis in this Subsection is based in part on a Water Supply Assessment (WSA) prepared by the Eastern Municipal Water District (EMWD). The WSA is entitled, "Water Supply Assessment Report, Keller Crossing (Specific Plan No. 380)," is dated December 15, 2021, and is included as *Technical Appendix M1* to this EIR (EMWD, 2021d). The WSA evaluates the water demands of a prior version of the Project, which anticipated that the Project would result in a demand for approximately 267.06 acre-feet per year (AFY). On June 6, 2025, the Project Applicant notified EMWD that the Project would result in a net increase in the water demand by approximately 1,090 gallons per day, or roughly 1.1 AFY, as compared to the water demand anticipated by the 2021 WSA. EMWD reviewed this change and determined that it did not represent a substantial increase in demand as compared to what was evaluated in the 2021 WSA. Subsequently, on July 16, 2025, the Project Applicant notified EMWD that the Project was redesigned to include additional residential dwelling units in lieu of the commercial retail land uses previously planned for the site. EMWD reviewed these changes and determined that the net impact of the changes to the Project would result in an increase in the water demand of approximately 14,500 gallons per day, or roughly 16.3 AFY, compared to the demand estimate provided by the 2021 WSA. To address this increase, EMWD issued a letter update to the 2021 WSA indicating that the findings of the 2021 WSA still are applicable to the currently-proposed Project and reconfirming the conclusion reached by the 2021 WSA that the EMWD would have adequate water supply to serve the currently-proposed Project. This letter update is titled, "Keller Crossing Water Supply Assessment" (herein, "WSA Update"), is dated July 22, 2025, and is included as *Technical Appendix M2* (EMWD, 2025b). 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 service boundaries of the Eastern Municipal Water District (EMWD) for water and sewer service, Southern California Edison (SCE) for electricity, and the Southern California Gas Company (SoCal Gas) for natural gas, with numerous service providers for cable television and telephone services. Solid waste hauling service to the Project site is provided by the Waste Management of the Inland Empire.

### A. Water Service and Supply

Water service to the Project area is provided by the EMWD. EMWD provides potable water, recycled water, and wastewater services to an area of approximately 555 square miles in western Riverside County. EMWD is both a retail and wholesale agency, serving a population of over 800,000 people. Approximately half of EMWD's retail demands are supplied using local sources, while the balance is served by imported water purchased from the Metropolitan Water District (MWD). EMWD also purchases imported water from MWD to supplement the local supplies of its wholesale customers. Imported water is delivered to EMWD either as potable water treated by MWD, or as raw water that EMWD can either treat at one of its two local filtration plants or deliver as raw water for non-potable uses. (EMWD, 2025a, p. 3-2)

EMWD's local supplies include groundwater, desalinated groundwater, and recycled water. Groundwater is pumped from the Hemet/San Jacinto and West San Jacinto areas of the San Jacinto Groundwater Basin. Groundwater in portions of the West San Jacinto Basin is high in salinity and requires desalination for potable

use. EMWD owns and operates two desalination plants that convert brackish groundwater from the West San Jacinto Basin into potable water. EMWD also owns, operates, and maintains its own recycled water system that consists of four Regional Water Reclamation Facilities and several storage ponds spread throughout EMWD's service area that are all connected through the recycled water system. EMWD's goal is to beneficially use 100 percent of the recycled water it produces. (EMWD, 2025a, p. 3-2)

Potable imported water is treated and delivered to EMWD directly from MWD's two large filtration plants. The Henry J. Mills (Mills) Water Treatment Plant treats water from Northern California and provides it to EMWD through two connection points located in the northeast portion of EMWD's service area. The Robert F. Skinner (Skinner) Water Treatment Plant treats a blend of Colorado River water and water from Northern California and provides it to EMWD through a connection point in the southwest portion of EMWD's service area. (EMWD, 2025a, p. 3-3)

EMWD owns and operates two microfiltration plants that filter raw imported water delivered through MWD, removing particulate contaminants to achieve potable water standards. The two treatment plants, the Perris Water Filtration Plant and the Hemet Water Filtration Plant, are located in Perris and Hemet, respectively. Raw water from MWD also is used for groundwater replenishment in the eastern part of EMWD. EMWD and others can extract this water at a later date for beneficial uses. Untreated water from MWD used for agricultural purposes is delivered in the northeast for use by EMWD retail and wholesale accounts and in the south for Rancho California Water District (RCWD) agricultural accounts. (EMWD, 2025a, p. 3-3)

EMWD produces potable and brackish groundwater from the San Jacinto Groundwater Basin that underlies the EMWD service area. EMWD's groundwater wells pump primarily from the eastern portion of EMWD, with the largest amount of production taking place around the cities of Hemet and San Jacinto. EMWD owns and operates two desalination plants in Sun City, the Menifee Desalter and the Perris I Desalter, which treat brackish groundwater through reverse osmosis to achieve potable water standards. (EMWD, 2025a, p. 3-3)

In addition to the potable water system, EMWD maintains a regional recycled water system that provides tertiary-treated recycled water to customers for agricultural, landscape irrigation, environmental, and industrial use. EMWD's recycled water system consists of four regional water reclamation facilities (RWRFs) that treat municipal sewage and produce water for recycling. The four RWRFs, the San Jacinto Valley RWRF, the Moreno Valley RWRF, the Temecula Valley RWRF, and the Perris Valley RWRF, are spread throughout EMWD's service area. A network of pipelines connects the four RWRFs, as well as several distribution storage ponds, to manage the delivery of recycled water. (EMWD, 2025a, p. 3-3)

Table 4.20-1, *Actual Demands for Portable and Raw Water within the EMWD Service Area*, depicts the recent water deliveries within the EMWD urban water service area. The values shown in Table 4.20-1 do not include water transfers to other agencies or imported water used to recharge the Hemet/San Jacinto groundwater basins. As shown, in 2020 the EMWD delivered approximately 84,673 acre-feet of water in 2020. Additionally, Table 4.20-2, *EMWD Projected Demand for Potable and Raw Water*, presents projected water demand within the EMWD service area through year 2045. As shown, EMWD anticipates that the total demand for water within its service area would increase to 123,000 acre-feet by 2045.

**Table 4.20-1 Actual Demands for Portable and Raw Water within the EMWD Service Area**

| Use Type | Additional Description | Level of Treatment When Delivered | 2020 Volume |
|---|---|---|---|
| Single Family | | Drinking Water | 52,162 |
| Multi-Family | | Drinking Water | 6,535 |
| Commercial | | Drinking Water | 4,267 |
| Industrial | | Drinking Water | 571 |
| Institutional/Governmental | | Drinking Water | 1,629 |
| Landscape | | Drinking Water | 8,155 |
| Agricultural irrigation | | Drinking Water | 1,114 |
| Agricultural irrigation | | Raw Water | 446 |
| Other | | Drinking Water | 1,287 |
| Non-Revenue | System losses & unbilled, authorized consumption | Drinking Water | 8,507 |
| | | **TOTAL:** | **84,673** |

1) Passive water savings due to the restrictions outlined in the Administrative Code are included in the demand projections for EMWD's retail service area.
2) Landscape demands remain constant/decrease over time as landscape accounts are offset by conversion to the recycled water system.
3) Projections for losses in the table include system losses (real and apparent) and unbilled, authorized consumption. EMWD's water loss audits are completed on a fiscal year basis (rather than calendar year) and report estimated system losses.

(EMWD, 2025a, Table 4-1)

**Table 4.20-2 EMWD Projected Demand for Potable and Raw Water**

| Use Type | Additional Description | 2025 | 2030 | 2035 | 2040 | 2045 |
|---|---|---|---|---|---|---|
| Single Family | | 66,900 | 71,700 | 76,700 | 80,500 | 84,000 |
| Multi-Family | | 8,500 | 9,100 | 9,700 | 10,200 | 10,600 |
| Commercial | | 6,100 | 6,500 | 7,000 | 7,300 | 7,600 |
| Industrial | | 600 | 600 | 700 | 700 | 700 |
| Institutional/Governmental | | 2,700 | 2,900 | 3,100 | 3,200 | 3,400 |
| Landscape | | 8,400 | 7,600 | 6,800 | 6,200 | 5,500 |
| Agricultural irrigation | Potable Water | 1,500 | 1,500 | 1,500 | 1,500 | 1,500 |
| Agricultural irrigation | Raw Water | 500 | 500 | 500 | 500 | 500 |
| Other | | 0 | 0 | 0 | 0 | 0 |
| Non-Revenue | System losses & unbilled, authorized consumption | 7,400 | 7,900 | 8,400 | 8,800 | 9,200 |
| | **Total:** | **102,600** | **108,300** | **114,400** | **118,900** | **123,000** |

1) Passive water savings due to the provisions outlined in the Administrative Code are included in the demand projections for EMWD's retail service area.
2) Landscape demands remain constant/decrease over time as landscape accounts are offset by conversion to the recycled water system.
3) Projections for losses in the table include system losses (real and apparent) and unbilled, authorized consumption.

(EMWD, 2025a, Table 4-3)

Table 4.20-3, *EMWD Projected Water Supplies*, presents the projected water supply available to EMWD through 2045. As shown, the EMWD projects that it will have access to 187,100 acre-feet per year (AFY) by 2045, which is adequate to meet the EMWD's projected demand (as shown in Table 4.20-2) through 2045.

**Table 4.20-3 EMWD Projected Water Supplies**

| Water Supply | Additional Detail on Water Supply | Projected Water Supply (AFY) Reasonably Available Volume | | | | |
|---|---|---|---|---|---|---|
| | | 2025 | 2030 | 2035 | 2040 | 2045 |
| Purchased or Imported Water | Metropolitan Treated/ Untreated | 66,447 | 72,147 | 70,247 | 74,747 | 78,847 |
| Groundwater (not desalinated) | Pumped from the Hemet/San Jacinto Basin | 7,303 | 7,303 | 7,303 | 7,303 | 7,303 |
| Groundwater (not desalinated) | Pumped from the West San Jacinto Basin | 11,450 | 11,450 | 11,450 | 11,450 | 11,450 |
| Desalinated Water - Groundwater | Desalinated water from the West San Jacinto Basin | 13,400 | 13,400 | 13,400 | 13,400 | 13,400 |
| Recycled Water | Excludes Storage Pond Incidental Recharge / Evaporation | 43,330 | 49,020 | 54,500 | 59,800 | 64,100 |
| Other | Purified Water Replenishment (IPR) | 4,000 | 4,000 | 12,000 | 12,000 | 12,000 |
| | **Total:** | **145,930** | **157,320** | **168,900** | **178,700** | **187,100** |

The projected recycled water supply total is inclusive of recycled water that is required to be recharged as part of EMWD's planning Purified Water Replenishment (PWR) Program – an Indirect Potable Reuse project with multiple phases. This recharge volume is reported under the groundwater recharge line item in Table 6-7 (DWR 6-4R) of the 2020 EMWD UWMP as a demand/beneficial use of EMWD's recycled water supply. The projected supply total under the "other" category reflects the volume of water produced by PWR that will be used to meet demands on EMWD's potable water system.
(EMWD, 2025a, Table 6-15)

### B. Sewer Service and Treatment

EMWD provides wastewater collection, treatment, and recycled water services throughout the Project area. Four (4) operational RWRFs are operated throughout EMWD, and include the San Jacinto Valley RWRF, the Moreno Valley RWRF, the Temecula Valley RWRF, and the Perris Valley RWRF. As shown below in Table 4.20-4, *Wastewater Treatment Capacity*, the four RWRFs have a combined capacity of 86,300 AFY, or approximately 77.0 million gallons per day (MGD). In addition to treatment facilities, EMWD has several recycled water storage ponds throughout EMWD service area. (EMWD, 2025a, p. 6-12)

Collectively, the RWRFs within EMWD collected and treated approximately 48,200 AFY in 2020, or approximately 43.0 MGD. Sewer flows from the Project site would be treated by the Temecula Valley RWRF, which has a daily capacity of 23.0 MGD and typical daily flows of 14.0 MGD (EMWD, 2021e). EMWD treats all of the wastewater collected in its service area to tertiary standards, which is suitable for all permitted uses, including irrigation of food crops and full-body contact. (EMWD, 2025a, p. 6-12)

**Table 4.20-4 Wastewater Treatment Capacity**

| Facility | Treatment Capacity (AFY) |
|---|---|
| San Jacinto Valley | 15,700 |
| Moreno Valley | 17,900 |
| Temecula Valley | 25,800 |
| Perris Valley | 26,900 |
| **TOTAL** | **86,300** |

(EMWD, 2025a, Table 6-3)

### C. Storm Water Drainage

The Project site currently consists of vacant, undeveloped land is relatively flat topography in the southern portions of the site, with undulating hill forms occurring in the north and northeastern portions of the Project site. Elevations on site range from 1,422 feet above mean sea level (amsl) in the southeast corner of the Project site to 1,587 feet amsl near the northeast corner of the Project site (Google Earth, 2025). As previously depicted on EIR Figure 4.10-2, under existing conditions the Project contains natural water courses that convey runoff from the northerly higher elevation to south and southeast of the Project site, which ultimately flow offsite toward and through several existing Caltrans reinforced concrete pipe (RCP) culvert-under-crossings along Winchester Road (Highway-79). A major drainage course located southwest of the Project site conveys a significant tributary area runoff from the north and west areas of the site and surface-flows southeasterly across Pourroy Road and Keller Road. This water course continues southeasterly, adjacent to existing residential parcels, and crosses Winchester Road (Highway-79) via several existing Caltrans RCP culverts. Presently, there is no existing storm drain infrastructure on-site or within the Pourroy Road and Keller Road right of ways. Refer to EIR Subsection 4.10, *Hydrology and Water Quality*, for a more detailed description of the existing drainages on site. (RTM, 2025, p. 3)

### D. Solid Waste Collection and Disposal

Solid waste collection and disposal is provided by the Riverside County Department of Waste Resources (RCDWR) through a franchise agreement with a private company, Waste Management Inc. (WMI), with the bulk of recyclable waste and green waste delivered to the Moreno Valley Solid Waste Recycling and Transfer Station (MVTS) for processing. The facility is located at 17700 Indian Street in Moreno Valley. It is permitted for a 2,500 tons per day (tpd) operation. (RCDWR, 2025)

WMI uses the El Sobrante landfill for disposal, but may also utilize the Badlands and/or Lamb Canyon landfills for disposal of the waste generated from the proposed Project. The following is a description of these facilities, based on information provided by RCDWR in response to the Project's Notice of Preparation (refer to EIR *Technical Appendix A2*):

- El Sobrante Landfill. The El Sobrante Landfill is located east of Interstate 15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson Canyon Road. The landfill is owned and operated by USA Waste of California, a subsidiary of Waste Management, Inc., and encompasses 1,322 acres, of which 645 acres are permitted for landfill operation. The El Sobrante Landfill has a total disposal capacity of approximately 209.9 million cubic yards and can receive up to 70,000 tons per week (tpw) of refuse. USA Waste must allot at least 28,000 tpw for County refuse. The landfill's permit allows a maximum of 16,054 tons per day (tpd) of waste to be accepted into the landfill, due to the limits on vehicle trips. If needed, 5,000 tpd must be reserved for County waste, leaving the maximum commitment of Non-County waste at 11,054 tpd. Per the 2023 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 47.2 million tons. In 2024, the El Sobrante Landfill accepted a daily average of 10,557 tons with a period total of approximately 3,251,611 tons. The landfill is expected to reach capacity in approximately 2059. Based on data from March 2025 (the most recent month for which tonnage reports are available), the El Sobrante

received an average of 67,010 tons per week (tpw) of solid waste, resulting in an excess capacity of 2,900 tpw. (RCDWR, 2025, p. 2; SWIS, 2025a)

- Badlands Landfill. The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total disturbance area of 278 acres, of which 150 acres are for refuse disposal. Landfill expansion potential exists at the Badlands Landfill site. Under the 2022 Solid Waste Facility Permit (SWFP), the permitted disturbance area increases from 278 acres to 811 acres, and the refuse disposal area increases from 150 acres to 409 (in multiple stages). The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 68.6 million tons. As of January 1, 2025 (beginning of day), the landfill had a total remaining disposal capacity of approximately 48.9 million tons. Under the 2022 SWFP, the landfill would have a remaining disposal capacity estimated to last, at a minimum, until approximately 2059. From January 2024 to December 2024, the Badlands Landfill accepted a daily average of 3,003 tons with a period total of approximately 924,862 tons. Based on data from April 2025 (the most recent month for which tonnage data is available), the Badlands Landfill received an average of approximately 2,194.9 tpd of solid waste, resulting in an excess daily capacity of 2,805.1 tpd. (RCDWR, 2025, pp. 2-3; SWIS, 2025b)

- 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.1 As of January 1, 2025 (beginning of day), the landfill has a total remaining capacity of approximately 6.1 million tons. The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032. From January 2024 to December 2024, the Lamb Canyon Landfill accepted a daily average of 1,973 tons with a period total of approximately 607,583 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site. Based on data from April 2025 (the most recent month for which tonnage data is available), the Lamb Canyon Landfill received an average of 2,051.4 tpd of solid waste, resulting in an excess daily capacity of 2,948.6 tpd. (RCDWR, 2025, p. 3; SWIS, 2025c)

### 4.20.2 Applicable Regulatory Requirements

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

## A. 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.

#### ❑ 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.

#### ❑ 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, 2021)

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.

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. Within UWMPs, urban water suppliers must:

- Assess the reliability of water sources over a 20-year planning time frame
- Describe demand management measures and water shortage contingency plans
- Report progress toward meeting a targeted 20 percent reduction in per-capita (per-person) urban water consumption by the year 2020
- Discuss the use and planned use of recycled water

❑ **Government Code Section 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.

❑ **California Senate Bill 610**

The California Water Code (Water Code) Sections 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. 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.

A Water Supply Assessment (WSA) was issued for a prior version of the Project in 2021, which evaluates the water demands of a prior version of the Project. Based on calculations prepared by the Project engineer, it was determined that the currently-proposed Project would have a slightly increased demand for potable water of approximately 1,000 gallons per day (gpd), or roughly 1.1 acre-feet per year (AFY), as compared to the range of land uses evaluated in the 2021 WSA. EMWD reviewed the proposed Project and the proposed Project's anticipated increase in demand for 1.1 AFY, and issued a letter update to the 2021 WSA indicating that the findings of the 2021 WSA still are applicable to the currently-proposed Project and reconfirming the conclusion reached by the 2021 WSA that the EMWD would have adequate water supply to serve the currently-proposed Project. Subsequently, on July 16, 2025, the Project Applicant notified EMWD that the Project was redesigned to include additional residential dwelling units in lieu of the commercial retail land uses previously planned for the site. EMWD reviewed these changes and determined that the net impact of the changes to the Project would result in an increase in the water demand of approximately 14,500 gallons per day, or roughly 16.3 AFY, compared to the demand estimate provided by the 2021 WSA. To address this increase, EMWD issued a letter update to the 2021 WSA indicating that the findings of the 2021 WSA still are applicable to the currently-proposed Project and reconfirming the conclusion reached by the 2021 WSA that the EMWD would have adequate water supply to serve the currently-proposed Project. The original WSA and the WSA Update letter are included as EIR *Technical Appendices M1*and *M2*, respectively. (EMWD, 2021d; EMWD, 2025b)

❑ **CA. Water Code Section 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.

❑ **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.

❑ **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.

❑ **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.

❑ **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.

### *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. The IWMA also required:

- The establishment of a task force to coordinate the development of city Source Reduction and Recycling Elements (SRREs) and a countywide siting element.

- Each city, by July 1, 1991, to prepare, adopt and submit a SRRE to the county which includes the following components: waste characterization; source reduction; recycling; composting; solid waste facility capacity; education and public information; funding; special waste (asbestos, sewage sludge, etc.); and household hazardous waste.

- Each county, by January 1, 1991, to prepare a SRRE for its unincorporated area, with the same components described above, and a countywide siting element, specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the jurisdiction which cannot be reduced or recycled for a 15-year period.

- Each county to prepare, adopt, and submit to the Board an Integrated Waste Management Plan (IWMP), which includes all of the elements described above.

- Each city or county plan to include an implementation schedule which shows: diversion of 25 percent of all solid waste from landfill or transformation facilities by January 1, 1995 through source reduction, recycling, and composting activities; and, diversion of 50 percent of all solid waste by January 1, 2000 through source reduction, recycling, and composting activities.

- The CIWMB to review the implementation of each SRRE at least once every two years.

- The IWMA required the CIWMB, in conjunction with an inspection conducted by a Lead Enforcement Agency (LEA), to conduct at least one inspection per year of each solid waste facility in the state.

Additionally, the IWMA established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities.

❑ **Waste Reuse and Recycling Act (AB 1327)**

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

❑ **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.

❑ **2022 California Green Building Standards Code (CAL Green)**

The most recent edition of CalGreen (Title 24, California Code of Regulations, Part 11) became effective January 1, 2023, 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). This code features:

- Regulations for energy efficiency, water efficiency and conservation, material conservation and resource efficiency, environmental quality, and more.
- Mandatory provisions for commercial, residential, and public school buildings.
- Appendices with voluntary provisions for all of these occupancies plus hospitals.
- Residential and nonresidential provisions are in separate chapters for easier use.

### *3. Applicable Energy Conservation Regulations*

❑ **California Energy Efficiency Standards for Residential and Nonresidential Buildings**

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.

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.

The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

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.

The 2025 Building Energy Efficiency Standards apply to newly constructed buildings, additions, and alterations. Workshops are held to present revisions and obtain public comments. Proposed standards were adopted in 2024 and went into effect January 1, 2026. The California Energy Commission updates these standards every three years. (CEC, 2024)

❑ **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 Section 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.

### 4.20.3 Basis for Determining Significance

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

- *Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;*
- *Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;*

- *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;*
- *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or*
- *Fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste.*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section XIX of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would result in a significant impact to utilities and service systems if the Project or any Project-related component would:

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

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

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

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

e. *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals;*

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

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

    1. *Electricity;*
    2. *Natural Gas;*
    3. *Communications systems;*
    4. *Street lighting;*
    5. *Maintenance of public facilities, including roads; or*

*6. Other governmental services.*

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

### 4.20.4 Impact Analysis

**Threshold a.: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

As discussed in EIR subsection 3.5.3, potable water service to the Project would be provided from EMWD. As part of the Project, and as previously depicted on EIR Figure 3-7, a 24-inch water main would be constructed in Pourroy Road that would connect to the existing 18-inch line at the intersection of Ruft Road and Pourroy Road. The 24-inch water main would extend north within Pourroy Road, and would connect to a 30-inch line that would be constructed within proposed Keller Road easterly to an existing point of connection with a 12-inch water line near Elm Crest Street. 12-inch water lines would be constructed on-site within proposed A Street and B Street that would connect to the 30-inch water line proposed within Keller Road at two locations. A series of 8- to 12-inch water lines would be constructed along internal roadways to provide water service to individual residences.

As also discussed in EIR subsection 3.5.3, recycled water service to the Project also would be provided from EMWD. As part of the Project, and as previously depicted on EIR Figure 3-8, a 12-inch recycled water line is proposed to be constructed within Keller Road between Leon Road to the west and Winchester Road in the east. The 12-inch recycled water line would connect to an existing 24-inch recycled water line within Leon Road. A series of 8-inch recycled water lines would be constructed within on-site backbone roadways to provide recycled water to the proposed on-site park and common landscaped areas.

As also discussed in EIR subsection 3.5.3, and as previously depicted on EIR Figure 3-9, sewer service for the proposed Project would be provided by EMWD from an existing sewer main and manhole located in Abelia Street near its intersection with Winchester Road. A 12-inch sewer main would be constructed within Pourroy Road and Keller Road. A series of on-site 8-inch sewer lines would be constructed on site within internal roadways to provide sewer service to individual lots.

EIR subsection 3.5.3 also includes a description of the Project's proposed stormwater drainage system. As previously depicted on EIR Figure 3-6, runoff tributary to and/or generated within the developed portions of the Project site would be collected via a series of on-site catch basins and storm drain lines ranging in size up from 12 to 42 inches, which would convey flows into proposed on-site water quality and detention basins. Runoff that is currently tributary to the Project site from the west and northwest would be conveyed to a proposed debris basin (lot 638) proposed in the southwest corner of the Project site. Runoff generated in the southern portions of the Project site that are proposed for development (Drainage Area C) would be conveyed to proposed Extended Detention Basin C2, proposed along the south side of the realigned Keller

Road and north of the existing (Old) Keller Road. Runoff generated in the northeastern portions of the Project site proposed for development would be conveyed to a proposed water quality/detention Basins E and F, proposed along the Project site's frontage with Winchester Road. Runoff from the natural hillside in the northeast corner of the Project site either would be conveyed to Basin G for detention and water quality treatment, or would be discharged directly into existing drainage facilities within Winchester Road. Runoff from the water quality/detention basins ultimately would be conveyed to existing Caltrans culverts beneath Winchester Road and ultimately discharged off-site and towards a major natural drainage course southeast of the Project site. All proposed stormwater drainage improvements would be designed and constructed in compliance with applicable Riverside County Flood Control and Water Conservation District (RCFCWCD) standards and would be subject to review and approval by the RCFCWCD, which serves as a responsible Agency for the Project.

The Project also would require local connections for electricity, natural gas, and telecommunications facilities. However, given that the Project site is located in close proximity to existing residential uses, these facilities already are available in the local area. Any local connections to facilities for electricity, natural gas, and telecommunications facilities are anticipated to occur within the proposed rights-of-way of public roadways, including the realigned Keller Road through the Project site.

Impacts associated with the above-described Project-related water, recycled water, sewer, drainage, electricity, natural gas, and telecommunications 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, recycled water, sewer, drainage, electricity, natural gas, and telecommunications improvements. As such, with the mitigation measures specified throughout this EIR, Project impacts due to water, recycled water, sewer, drainage, electricity, natural gas, and telecommunications improvements would be less than significant.

With respect to wastewater treatment capacity, wastewater generated by the Project would be conveyed to the Temecula Valley RWRF, which has a daily capacity of 23.0 MGD and typical daily flows of approximately 14.0 MGD, with an ultimate capacity of 28 MGD (EMWD, 2021e). Thus, the existing excess capacity at the Temecula Valley RWRF is approximately 9.0 MGD, with an ultimate excess capacity of 14.0 MGD. As shown in Table 4.20-5, *Project-Related Wastewater Generation*, at buildout the Project is anticipated to generate approximately 159,620 gpd of wastewater requiring treatment, or approximately 58.3 million gallons per year, based on the rates used in Riverside County EIR No. 521, which was prepared in conjunction with the County's 2015 General Plan Update. The Project's wastewater generation would represent approximately 1.8% of the Temecula Valley RWRF's current excess capacity, and would represent 1.1% of the ultimate planned excess capacity. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Temecula Valley RWRF, 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/ Acreage | Generation Factors | Wastewater Generation (gpd) |
|---|---|---|---|
| Residential | 694 du | 230 gpd/du | 159,620 |
| **Total:** | **--** | **--** | **159,620** |

Notes: du = dwelling units; gpd = gallons per day.
(Riverside County, 2015, Table 4.19-BJ)

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

EMWD is responsible for supplying the region with its potable and non-potable water needs. On July 1, 2021, the EMWD Board of Directors adopted the 2020 UWMP. This plan provides information on EMWD's projected supplies and demands in five-year increments through the year 2045, and reports EMWD's progress on water use efficiency targets as defined in the Water Conservation Act of 2009. The 2020 UWMP shows that the majority of EMWD's existing and future planned demand is to be met through imported water delivered by MWD. Demand for EMWD shown in the 2020 UWMP is projected across the EMWD service area as a whole and is not project specific. The 2020 UWMP is herein incorporated by reference and is available for public review at EMWD, 2270 Trumble Road, Perris, California 92570 (EMWD, 2025a).

To assess the ultimate effect of the Project's water demands and service needs, the EMWD previously prepared a WSA for the Project (included as *Technical Appendix M1* to this EIR), in accordance with Senate Bill 610 (SB 610) and Senate Bill 221 (SB 221). SB 610 requires the preparation of a water supply assessment report for projects that propose to construct the equivalent of 500 or more residential dwelling units. SB 221 requires affirmative written verifications of sufficient water supply. Provided below is a summary of EMWD's water supplies and water demand projections based on the UWMP and the Project-specific WSA. However, as noted previously, the WSA evaluates the water demands of a prior version of the Project. Based on calculations prepared by the Project engineer, it was determined that the currently-proposed Project would have a slightly increased demand for potable water of approximately 1,000 gpd, or roughly 1.1 AFY, as compared to the range of land uses evaluated in the 2021 WSA. EMWD reviewed the proposed Project and the proposed Project's anticipated increase in demand for 1.1 AFY, and issued a letter update to the 2021 WSA (included as EIR *Technical Appendix M2*) indicating that the findings of the 2021 WSA still are applicable to the currently-proposed Project and reconfirming the conclusion reached by the 2021 WSA that the EMWD would have adequate water supply to serve the currently-proposed Project. Accordingly, the following information is taken from the 2021 WSA, and modified as necessary to reflect the range of land uses proposed as part of the Project.

❑ **Population Projection**

The population projections for EMWD's service area were updated in the 2020 UWMP using information obtained from the most recent regional transportation plan/sustainable communities strategy completed by the Southern California Association of Governments (SCAG). This study, known as Connect SoCal, forecasted regional growth through 2045, and was adopted by SCAG on September 3, 2020. The data

available from Connect SoCal includes projections of population, households, and employment within each of SCAG's Traffic Analysis Zones, which closely resemble block groups in the United States Census. (EMWD, 2021d, p. 4)

Consistent with the significant percentage of undeveloped land within EMWD's service area, growth is anticipated to continue throughout the 2020 UWMP's 25-year planning horizon, as shown in Table 4.20-6, *EMWD Service Area Projected Population – 2020-2045*. Currently, approximately 40 percent of the District's service area is built out. As population and the associated water demands increase, EMWD will continue to proactively manage its water supply portfolio through the development of local resources in conjunction with additional imported water purchases from MWD as outlined in the 2020 UWMP. (EMWD, 2021d, p. 4)

**Table 4.20-6 EMWD Service Area Projected Population – 2020-2045**

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

(EMWD, 2021d, Table 1)

❑ **Overview of EMWD Supplies**

EMWD has four sources of water supply: imported water purchased from MWD, potable groundwater, desalinated brackish groundwater, and recycled water (EMWD, 2021d, p. 4).

Approximately half of EMWD's retail demands are supplied through local water sources, which consists of potable groundwater, desalinated brackish groundwater, and recycled water. The remaining demands are supplied by a mix of raw and treated water purchased from MWD. EMWD treats most of its raw water for potable use at two water filtration plants, located in Perris and Hemet. A small quantity of raw water is supplied directly to agricultural customers. Over the past five years, EMWD's retail water supply portfolio averaged approximately 49 percent imported water, 11 percent groundwater, 6 percent desalinated brackish groundwater, and 34 percent recycled water. An annual breakdown of EMWD's retail water supplies over this five-year period is shown in Table 4.20-7, *EMWD Retail Water Supply Portfolio (2016-2020)*. The proportions of local to imported water supplies are impacted by EMWD's participation in MWD's cyclic storage program in 2019, where MWD offered an incentive for member agencies to voluntarily reduce local groundwater production and purchase additional imported water due to wet hydrologic conditions at the time. (EMWD, 2021d, pp. 4-5)

EMWD imports raw and treated water from MWD to supplement the local water supplies of its wholesale agencies. In addition, EMWD has agreements to provide recycled water to some of its wholesale agencies. An annual breakdown of EMWD sales to wholesale agencies is shown in Table 4.20-8, *EMWD Wholesale Water Supply Portfolio (2016-2020)*. Note that Table 4.20-8 only documents sources of water sold by EMWD on a wholesale basis and does not include local supplies (such as groundwater) available and used by EMWD's wholesale agencies to meet customer demands. (EMWD, 2021d, p. 5)

As development increases the water demands within EMWD's service area, it is anticipated that new demands will be met through a combination of additional imported water from MWD and the development of local supply projects including increased production of potable groundwater, desalination of brackish groundwater, and use of recycled water. EMWD also plans to continue its efforts to enhance water use efficiency within its service area. 0,

*EMWD Projected Water Supplies – Average Year* Hydrology, and Table 4.20-10, *EMWD Projected Wholesale Water Supplies – Average Year Hydrology*, show EMWD's

**Table 4.20-7 EMWD Retail Water Supply Portfolio (2016-2020)**

| Type | Source | 2016 | 2017 | 2018 | 2019 | 2020 |
|---|---|---|---|---|---|---|
| Imported – Treated[1] | Metropolitan Water District | 38,157 | 47,527 | 42,419 | 41,167 | 44,726 |
| Imported – EMWD Treated | Metropolitan Water District | 15,546 | 12,860 | 18,288 | 18,969 | 17,584 |
| Imported – Raw[2] | Metropolitan Water District | 697 | 407 | 503 | 501 | 642 |
| Groundwater[3],[4] | San Jacinto Groundwater Basin | 14,864 | 13,270 | 13,605 | 8,044 | 14,410 |
| Desalination | San Jacinto Groundwater Basin | 6,454 | 6,342 | 7,544 | 7,433 | 7,310 |
| Recycled Water[5] | Regional Water Reclamation Facilities | 43,388 | 42,746 | 44,016 | 40,676 | 39,642 |
| | **Total:** | **119,106** | **123,152** | **126,375** | **116,790** | **124,314** |

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

(EMWD, 2021d, Table 2)

**Table 4.20-8 EMWD Wholesale Water Supply Portfolio (2016-2020)**

| Type | Source | 2016 | 2017 | 2018 | 2019 | 2020 |
|---|---|---|---|---|---|---|
| Imported – Treated | Metropolitan Water District | 13,034 | 14,103 | 14,672 | 11,070 | 15,008 |
| Imported – Raw | Metropolitan Water District | 12,558 | 10,448 | 14,385 | 11,293 | 14,909 |
| Imported – Recharge (Raw) | Metropolitan Water District | 12,657 | 19,686 | 4,783 | 20,730 | 6,647 |
| Recycled Water | Regional Water Reclamation Facilities | 1,834 | 1,387 | 1,878 | 1,619 | 1,285 |
| Total | | **40,083** | **45,624** | **35,718** | **44,712** | **37,669** |

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

(EMWD, 2021d, Table 3)

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

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

1. Imported water total represents planned EMWD purchases, not the maximum volume of water available from MWD.
2. Groundwater total includes only 7,303 AFY of pumping from the adjudicated Hemet/San Jacinto Management Plan Area, which is EMWD's long term adjusted base production right. EMWD is also able to pump a portion of water recharged under the Soboba Settlement Agreement that is not used by the Soboba Tribe. EMWD is also able to carry over production rights into future years. As of the end of calendar year 2020, EMWD has accrued a carry-over credit balance of over 25,000 acre-feet.
3. Purified Water Replenishment is a planned indirect potable reuse project.
4. Recycled water supply total excludes volumes to be recharged under Purified Water Replenishment to avoid double counting as well as projected losses due to evaporation and incidental storage pond percolation.

(EMWD, 2021d, Table 4)

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

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

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

(EMWD, 2021d, Table 5)

projected water supplies for both retail and wholesale service throughout the planning horizon set within its UWMP. These estimates do not account for all potential new local supply projects that could potentially be developed by EMWD or by agencies to which EMWD provides wholesale service. (EMWD, 2021d, p. 6)

❑ **EMWD Projected Demands**

EMWD's primary retail customers for potable and raw water can be divided into residential, commercial, industrial, institutional, landscape, and agricultural sectors. The residential sector is EMWD's largest customer segment; however, each sector plays a role in the growth and development of EMWD's service area. The historic and projected customer water use by the various potable/raw retail customer types are shown in Table 4.20-11, *EMWD Retail Potable/Raw Water Use by Customer Type*. (EMWD, 2021d, p. 16)

EMWD also provides wholesale water service to a number of sub-agencies, serves recycled water, and imports water for recharge purposes. These demands are shown in Table 4.20-12, *EMWD Wholesale Deliveries to Other Agencies* (EMWD, 2021d, p. 17)

**Table 4.20-11 EMWD Retail Potable/Raw Water Use by Customer Type**

| Use Type | Actual Water Use - AFY | | | | Projected Water Use - AFY | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | 2005 | 2010 | 2015 | 2020 | 2025 | 2030 | 2035 | 2040 | 2045 |
| Single Family | 62,300 | 54,000 | 45,700 | 52,200 | 66,900 | 71,700 | 76,700 | 80,500 | 84,000 |
| Multi-Family | 5,500 | 6,100 | 5,800 | 6,500 | 8,500 | 9,100 | 9,700 | 10,200 | 10,600 |
| Commercial | 3,900 | 4,200 | 4,600 | 4,300 | 6,100 | 6,500 | 7,000 | 7,300 | 7,600 |
| Industrial | 400 | 400 | 300 | 600 | 600 | 600 | 700 | 700 | 700 |
| Institutional | 2,900 | 2,300 | 2,000 | 1,600 | 2,700 | 2,900 | 3,100 | 3,200 | 3,400 |
| Landscape | 7,500 | 8,900 | 7,700 | 8,200 | 8,400 | 7,600 | 6,800 | 6,200 | 5,500 |
| Agricultural | 2,500 | 2,300 | 2,800 | 1,600 | 2,000 | 2,000 | 2,000 | 2,000 | 2,000 |
| **Total** | **85,000** | **78,200** | **68,900** | **75,000** | **95,200** | **100,400** | **106,000** | **110,100** | **113,800** |

(EMWD, 2021d, Table 6)

**Table 4.20-12 EMWD Wholesale Deliveries to Other Agencies**

| Supplier | Actual Deliveries - AFY | | | | Projected Deliveries - AFY | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | 2005 | 2010 | 2015 | 2020 | 2025 | 2030 | 2035 | 2040 | 2045 |
| City of Hemet | 100 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| City of Perris | 1,900 | 1,700 | 1,500 | 1,685 | 1,800 | 1,900 | 2,100 | 2,200 | 2,300 |
| City of San Jacinto | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| LHMWD | 100 | 1,300 | 4,300 | 986 | 5,100 | 5,500 | 5,900 | 6,300 | 6,700 |
| NWC | 800 | 600 | 200 | 409 | 500 | 1,000 | 1,100 | 1,200 | 1,200 |
| RCWD | 26,300 | 21,900 | 15,000 | 25,028 | 42,300 | 35,200 | 36,200 | 37,500 | 38,800 |
| WMWD (Murrieta) | 100 | 1,600 | 700 | 1,809 | 1,000 | 1,300 | 1,600 | 2,000 | 2,300 |
| Recharge (Soboba) | 0 | 0 | 0 | 6,467 | 7,500 | 7,500 | 7,500 | 7,500 | 7,500 |
| **Total** | **29,300** | **27,100** | **21,700** | **36,384** | **58,200** | **52,400** | **54,400** | **56,700** | **58,800** |

1. The Cities of Hemet and San Jacinto plan to meet 100% of demands using local groundwater supplies, however, EMWD can deliver water to the cities during high demand periods or when city wells are undergoing maintenance.
2. Under the Soboba Settlement Agreement, MWD must provide an annual average of 7,500 AFY of water to be recharged in the Hemet/San Jacinto Management Plan Area by EMWD, LHMWD, and the Cities of Hemet and San Jacinto to fulfill the Soboba Tribe's water right. Actual deliveries will vary from year to year, and MWD has the option to pre-deliver water. Recharge water unused by the Soboba Tribe is proportioned between the four agencies.

(EMWD, 2021d, Table 7)

Other water demands including recycled water use, recharge that occurred prior to or outside the scope of the Soboba Settlement Agreement, system losses, non-revenue water deliveries, and other, miscellaneous water usage are shown in Table 4.20-13, *Other Potable and Non-Potable Water Usage*. (EMWD, 2021d, p. 18) (EMWD, 2021d, p. 18)

Total demands on EMWD's water system are summarized in Table 4.20-14, *Summary of Total EMWD System Water Demands* (EMWD, 2021d, p. 18)

### *Project Water Demands*

As shown in Table 4.20-15, *2020 UWMP Land Use Demand Estimate for Project Site*, in the 2020 UWMP, the demand projections for the parcels covering the project site were estimated based on Commercial Retail,

**Table 4.20-13 Other Potable and Non-Potable Water Usage**

| Use Type | Actual Water Use - AFY | | | | Projected Water Use - AFY | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | 2005 | 2010 | 2015 | 2020 | 2025 | 2030 | 2035 | 2040 | 2045 |
| Recycled[1],[2] | 32,600 | 28,200 | 46,100 | 40,900 | 44,000 | 50,100 | 47,800 | 53,100 | 57,400 |
| Recharge[3] | 7,000 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other / Losses[4] | 7,700 | 8,400 | 9,100 | 9,800 | 7,400 | 7,900 | 8,400 | 8,800 | 9,200 |
| **Total** | **47,300** | **36,600** | **55,200** | **50,700** | **51,400** | **58,000** | **56,200** | **61,900** | **66,600** |

1. Recycled water projections include recycled water that is delivered to sub-agencies but excludes the volume of recycled water that is planned to be recharged as part of EMWD's Purified Water Replenishment (indirect potable reuse) project to avoid double counting.
2. Recycled water supply may be supplemented by brackish groundwater or raw water during high demand months.
3. Volume of recharge water excludes water that is imported under the Soboba Settlement Agreement (shown in prior table).
4. Other/losses category includes unbilled, authorized consumption use as well as real and apparent losses in the potable system.

(EMWD, 2021d, Table 8)

**Table 4.20-14 Summary of Total EMWD System Water Demands**

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

(EMWD, 2021d, Table 9)

**Table 4.20-15 2020 UWMP Land Use Demand Estimate for Project Site**

| Land Use Category | Average Day Demand (gpd) | Annual Demand (AFY) |
|---|---|---|
| Very Low Density Residential | 6,904 | 7.74 |
| Low Density Residential | 21,603 | 24.22 |
| Medium Density Residential | 26,987 | 30.25 |
| Medium-High Density Residential | 12,576 | 14.10 |
| Mixed Use Policy Area | 89,144 | 99.92 |
| Commercial Retail | 90,552 | 101.50 |
| **Total** | **247,766** | **277.73** |

(EMWD, 2021d, Table 10)

Mixed Use Policy, Medium-High Density Residential, Medium Density Residential, Low Density Residential, and Very Low Density Residential land uses, with a total demand of 277.73 AFY.

The Project's WSA (*Technical Appendix M1*) assumed the Project site would be developed with 280 "Medium-Density Residential (MDR)" dwelling units, 76 "Medium-High Density Residential (MHDR)" dwelling units, 80 "High Density Residential (HDR)" dwelling units, 17.7 acres of "Commercial Retail (CR)" uses, and 9.5 acres of "Open Space – Recreation (OS-R)." Subsequent to preparation of the Project's WSA, the Project was subsequently redesigned, and now includes 77 MDR dwelling units, 307 MHDR dwelling units, 310 HDR dwelling units, and 8.88 acres of OS-R land uses. In addition, at the time the Project's WSA was prepared in 2021, recycled water service was not available in the Project area. However, recycled water

is now available in the local area, and recycled water would be used to irrigate landscape areas within the on-site park. Accordingly, and based on the rates used in the Project's WSA to calculate water demand for MDR, MHDR, and HDR land uses, Table 4.20-16, *Project-Specific Water Demand Estimate*, shows the current Project's anticipated demand for potable water. As shown, the Project would generate a demand for approximately 252,780 gpd, or approximately 283.2 AFY.

**Table 4.20-16 Project-Specific Water Demand Estimate**

| Land Use | Dwelling Units/ Acres | Demand Factors | Average Day Demand | Annual Demand (AFY) |
|---|---|---|---|---|
| Medium-Density Residential (MDR) | 77 units | 440 gpd/unit | 33,880 | 38.0 |
| Medium-High Density Residential (MHDR) | 307 units | 400 gpd/unit | 122,800 | 137.6 |
| High Density Residential (HDR) | 310 units | 310 gpd/unit | 96,100 | 107.6 |
| | | **Total:** | **252,780** | **283.2** |

Note: Project water demand calculations are based on the current Project's water demand based on the water demand factors used in Table 11 of the Project's WSA (*Technical Appendix M1*).
(EMWD, 2021d, Table 11)

***Evaluation of Supply and Demand***

EMWD's 2020 UWMP includes an evaluation of EMWD's water supply reliability under a range of potential hydrologic conditions. The results for normal year conditions are shown in Table 12 and Table 13 of the Project's WSA (*Technical Appendix M*) for EMWD's retail and wholesale service respectively. The single dry year evaluation is documented in Table 14 and Table 15 of the WSA, and the results of the multiple dry year evaluation are shown in Table 16 and Table 17 of the WSA. The supply totals shown in the tables reflect EMWD's planned production and not EMWD's supply capacity. Under drought conditions, EMWD may increase local supply production, pump from stored water supplies, or purchase additional imported water from MWD if necessary. (EMWD, 2021d, p. 20)

EMWD's 2020 UWMP discusses the supply reliability for EMWD during dry years. EMWD expects its local supplies to remain highly reliable and resilient, even under severe hydrologic conditions. Similarly, MWD's UWMP shows that MWD would have the ability to meet all of its member agencies' project supplemental demand through 2045, even under a repeat of historic drought scenarios. (EMWD, 2021d, p. 22)

EMWD maintains a Water Shortage Contingency Plan (WSCP) that aims to reduce demand during water shortage using significant penalties for wasteful water use. EMWD's WSCP details demand reductions for several stages of shortage through a 50 percent or greater reduction. Additional information about contingency planning is included in Chapter 8 of EMWD's 2020 UWMP. The WSCP was last updated on June 30, 2021, and is located in Title 5, Article 10 of the EMWD Administrative Code, which is available on EMWD's website (www.emwd.org). EMWD continues to encourage voluntary reduction of water use and is currently in Stage 1 of the WSCP based on statewide water supply conditions. (EMWD, 2021d, p. 22)

❑ **Water Supply Assessment**

***Potable Water***

From a facilities perspective, the Project may be conditioned to construct off-site and on-site water facilities needed to distribute water throughout the Project area. Prior to construction, the developer would be required contact EMWD staff to establish development design conditions and determine if any revisions are required to the master plan. Figure 2 of the Project's WSA shows existing water facilities in relation to the Project, while EIR Figure 3-6 depicts the Project's proposed potable water improvements. EMWD plans to supply new water demands in its service area, including the Project, through a combination of additional imported water purchases from MWD and the ongoing development of EMWD's local supply resources. (EMWD, 2021d, p. 22)

***Recycled Water***

EMWD policy recognizes recycled water as the preferred source of supply for all non-potable water demands, including irrigation of recreation areas, greenbelts, open space common areas, commercial landscaping, and supply for aesthetic impoundment or other water features. According to the District's policies, the Project would be conditioned to construct a recycled water system separately from the potable water system. The Project's conceptual recycled water system is depicted on EIR Figure 3-8. The system would need to be constructed to recycled water standards. The Project may also be conditioned to construct off-site recycled water facilities. EMWD would make a final determination on requirements for recycled water use and facilities during the development design conditions phase of the Project. However, as it is not currently known whether such facilities would be required or what such facilities would consist of beyond what is already identified as part of SP 380A1 (refer to EIR Figure 3-8), it is not possible to assess environmental effects that may be associated with such improvements (State CEQA Guidelines § 15145). Such improvements may be subject to additional evaluation per CEQA as appropriate with future discretionary review for future implementing developments. (EMWD, 2021d, p. 22)

❑ **Conclusion**

EMWD relies on MWD and local resources to meet the needs of its growing population. MWD demonstrated in the 2020 MWD UWMP that with the addition of all water supplies, existing and planned, MWD has the ability to meet all of its member agencies' projected supplemental demand through 2045, even under a repeat of historic multiple-year drought scenarios. (EMWD, 2021d, p. 23)

In the event that the lead agency determines adequate water supply exists for the Project, the developer of this Project would be required to meet with EMWD Development Services Staff to establish development design conditions. The development design conditions would detail water, wastewater, and recycled water requirements to serve the Project. An agreement developed prior to construction would determine whether additional funding will be required to reduce existing customer demand on imported supplies through the expansion of local resources. The reduction of existing customer demand on imported water supplies would free up allocated imported water to be used to serve this Project under multiple dry year conditions. The amount of funding would be determined by EMWD (if required) and may take the form of a new component of connection fees or a separate charge. (EMWD, 2021d, p. 23)

Based on present information and the assurance that MWD is engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, EMWD has determined that it would be able to provide adequate water supplies to meet the potable water demand for this Project as part of its existing and future demands. (EMWD, 2021d, p. 23) Accordingly, sufficient water supplies are available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. The Project's effect on EMWD's regional water network would be less than significant.

| | |
|---|---|
| **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 inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?** |

As discussed under the analysis of Threshold a., the Project would be provided sanitary sewer service by the EMWD, and no septic tanks are proposed as part of the Project. A description of proposed sewer improvements is provided in EIR subsection 3.5.3, which are graphically depicted on EIR Figure 3-9. As discussed therein, sewer service for the proposed Project would be provided by EMWD from an existing sewer main and manhole located in Abelia Street near its intersection with Winchester Road. A 12-inch sewer main would be constructed within Pourroy Road and Keller Road. A series of on-site 8-inch sewer lines would be constructed on site within internal roadways to provide sewer service to individual lots.

Impacts associated with the above-described 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, cultural resources). 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. 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 wastewater treatment capacity, and as also discussed under the analysis of Threshold a., wastewater generated by the Project would be conveyed to the Temecula Valley RWRF. As previously indicated, the Temecula Valley RWRF receives typical flows of 14.0 MGD with an overall capacity of 23.0 MGD, resulting in an excess capacity of 9.0 MGD. As previously shown in Table 4.20-5, at buildout the Project is anticipated to generate approximately 159,620 gpd of wastewater requiring treatment. The Project's wastewater generation would represent approximately 1.8% of the Temecula Valley RWRF's current excess capacity, and would represent 1.1% of the ultimate planned excess capacity. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Temecula Valley RWRF, and impacts would therefore be less than significant.

**Threshold e.: Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

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 up to 70,000 tons per week (tpw), or 16,054 tpd. Per the 2023 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 47.2 million tons. In 2024, the El Sobrante Landfill accepted a daily average of 10,557 tons with a period total of approximately 3,251,611 tons. The landfill is expected to reach capacity in approximately 2059. (RCDWR, 2025, p. 2)

The Badlands Landfill is permitted to receive 5,000 tpd of MSW and 300 tpd for beneficial reuse. As of January 1, 2025 (beginning of day), the landfill had a total remaining disposal capacity of approximately 48.9 million tons. Under the 2022 SWFP, the landfill would have a remaining disposal capacity estimated to last, at a minimum, until approximately 2059. From January 2024 to December 2024, the Badlands Landfill accepted a daily average of 3,003 tons with a period total of approximately 924,862 tons. (RCDWR, 2025, pp. 2-3)

The Lamb Canyon 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.1 As of January 1, 2025 (beginning of day), the landfill has a total remaining capacity of approximately 6.1 million tons. The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032.3 From January 2024 to December 2024, the Lamb Canyon Landfill accepted a daily average of 1,973 tons with a period total of approximately 607,583 tons. (RCDWR, 2025, p. 3)

***Solid Waste Impacts During Construction***

Table 4.20-17, *Estimated Construction Solid Waste Generation*, provides an estimate of the amount of construction debris that would be generated by the Project, based on residential and non-residential construction waste generation factors provided by the U.S. Environmental Protection Agency (EPA). Table 4.20-17 does not account for the construction of site improvements other than buildings. Proposed non-building features (e.g., roads, utilities, etc.) would produce nominal amounts of construction waste that would not substantially exceed the solid waste totals (by phase) listed in Table 4.20-17.

As presented in Table 4.20-17, and based on a worst-case analysis of potential building rates, construction of the Project is anticipated to generate approximately 6,908.1 pounds per day (lbs/day) of construction waste requiring disposal, or approximately 3.45 tpd. The Project's worst-case daily construction waste would represent 0.14% of the permitted daily capacity at the MVTS (2,500 tpd), 0.59% of the available 2,900 tpw excess weekly disposal capacity at the El Sobrante Landfill, 0.12% of the 2,948.6 tpd excess daily disposal capacity at the Lamb Canyon Landfill, and 0.12% of the 2,805.1 tpd excess daily disposal capacity at the Badlands Landfill.

**Table 4.20-17 Estimated Construction Solid Waste Generation**

| Land Use | Construction Rate[1] | Estimated Building Size[1] | Solid Waste Generation Rate | Total | |
|---|---|---|---|---|---|
| | | | | lbs/Day | Tons/Day |
| Single-Family Residential | 0.72 dwelling units/day | 1,950 s.f. | 4.39 lbs/s.f. | 6,163.6 | 3.08 |
| Multi-Family Residential | 0.16 dwelling units/day | 1,060 s.f. | 4.39 lbs/s.f. | 744.5 | 0.37 |
| **Total Solid Waste Generation:** | | | | **6,908.1** | **3.45** |

1. Based on information presented in the Project's Energy Analysis technical report (EIR *Technical Appendix E*), which indicates that building construction would occur between February 6, 2023 and December 27, 2024, with an average single family home size of 1,950 s.f. and an average multi-family home size of 1,060 s.f. (Urban Crossroads, 2025b, Appendix 4.5, Subsection 1.2)
2. Source: U.S. Environmental Protection Agency. *Estimating 2003 Building-Related Construction and Demolition Materials Amounts*. Available online at: https://www.epa.gov/smm/estimating-2003-building-related-construction-and-demolition-materials-amounts. Accessed: November 2, 2021.

Given the estimated solid waste quantity generated by the Project on a daily basis during construction, it is estimated that the MVTS, El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill would have sufficient daily capacity to accept the construction waste generated by the proposed Project. Furthermore, all applicants for proposed development within the County are required to submit a Waste Recycling Plan (WRP). To verify AB 341 compliance for recycling of construction materials, the County requires accurate records for construction material recycling and solid waste disposal. According to County procedures, County occupancy permits (i.e., building final inspection) would not be cleared for issuance unless the required evidence (e.g., receipts) demonstrating appropriate WRP compliance is presented to the RCDWR. Mandatory compliance with the WRP requirements would further reduce Project impacts to solid waste by ensuring that 50% of the nonhazardous construction waste is recycled or reused. Based on the foregoing analysis, the Project would not cause or contribute to the need for new or expanded solid waste facilities during construction, and impacts would therefore be less than significant.

***Solid Waste Impacts During Operation***

As shown in Table 4.20-18, *Estimated Operational Solid Waste Generation*, buildout and occupancy of the Project is estimated to produce approximately 0.78 tpd of solid waste, or approximately 284.5 tpy. Per the Riverside Countywide Integrated Waste Management Plan (CIWMP), which applies to the Project, up to 50 percent of its solid waste would need to be diverted from area landfills. In conformance with the CIWMP, the Project Applicant is required to work with future contract refuse haulers to implement recycling and waste reduction programs for solid wastes.

Solid waste generated by the Project would be transported to a local solid waste transfer facility, the MVTS. At full buildout, waste generated by the Project would represent approximately 0.03% of the permitted daily capacity at the MVTS (2,500 tpd). Given the estimated volume of solid waste generated by the Project on a daily basis during the buildout condition, it is anticipated that the MVTS would have sufficient capacity to accept solid waste to be disposed by the Project. As noted above, the CIWMP would require that up to 50

**Table 4.20-18 Estimated Operational Solid Waste Generation**

| Land Use | Dwelling Unit (du)/ Square Footage (s.f.) | Generation Factors | Total Solid Waste Generated (tpy) | Average Solid Waste per Day (tpd) |
|---|---|---|---|---|
| Residential | 694 du | 0.41 tons/du/year | 284.5 tpy | 0.78 tpd |
| **Totals:** | -- | -- | **284.5 tpy** | **0.78 tpd** |

Notes: s.f. = square feet; tpy = tons per year; tpd = tons per day.
(Riverside County, 2015, Table 4.17-N)

percent of the solid waste be diverted from area landfills, which would further ensure the Project's solid waste generation does not exceed available landfill capacity.

Waste from the MVTS ultimately would be disposed at either the El Sobrante Landfill, Lamb Canyon Landfill, and/or Badlands Landfill. As previously indicated, the El Sobrante Landfill has an excess weekly capacity of approximately 2,900 tpw, the Lamb Canyon Landfill has an excess daily capacity of 2,948.6 tpd, and the Badlands Landfill has an excess daily capacity of 2,805.1 tpd. In the buildout condition, the Project would generate 0.19% of the excess weekly disposal capacity at the El Sobrante Landfill, 0.03% of the excess daily disposal capacity at the Lamb Canyon Landfill, and 0.03% of the excess daily disposal capacity at the Badlands Landfill. Because the Project would generate a relatively small amount of solid waste per day, as compared to the permitted daily capacities 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.

***Summary of Project Solid Waste Impacts***

As indicated above, regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project's construction and operational phases. Accordingly, impacts would be less than significant.

**Threshold f.: Would the Project 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)?**

The proposed Project would be regulated by the Riverside Countywide Integrated Waste Management Plan (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 percent 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 percent diversion rate 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 percent 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 Integrated Waste Management Act 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 CIWMB 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:**

**Electricity?**

**Natural Gas?**

**Communication Systems?**

**Street Lighting?**

**Maintenance of Public Facilities, including Roads?**

**Other Government Services?**

Electric service is currently available to the Project site through Southern California Edison (SCE), although existing facilities would need to be expanded as necessary to provide service to the Project. However, the Project area already is served by existing electrical lines; therefore, the construction of electricity facilities as necessary to serve the proposed Project would occur within the areas already planned for impact by the Project or within existing, improved roadways. Therefore, the construction of electrical facilities necessary to serve the proposed Project would not result in any significant impacts to the environment that are not already addressed by this EIR. No additional mitigation would be required.

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 and detention and water quality basins proposed throughout the Project site. Refer to the discussion of Threshold a., above, for a description of the Project's proposed drainage improvements. The proposed drainage improvements would be located in on-site 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 storm water 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 the County in accordance with Ordinance No. 461 (Roadway Standards) and Ordinance No. 460 (Subdivision of the Land) along on-site segments of Keller Road and along internal roadways within the Project site. All physical environmental impacts associated with street lighting and maintenance would occur within the boundaries of the on-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 the realignment of Keller Road through the Project site, the dedication of approximately six feet of the ultimate 36 feet of right-of-way along the Project site's frontage with Pourroy Road, the installation of eight additional feet of pavement along the Project site's frontage with Pourroy Road, site-adjacent improvements to Winchester Road (Highway 79), and internal roadways (including Streets "A" through "L"). Maintenance of these proposed public roadways would not result in any significant impacts to the environment. Impacts associated with the proposed improvements already are evaluated in appropriate sections of this EIR, and any identified impacts have been mitigated to the maximum feasible extent. Maintenance of these proposed public roadways 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 proposed roadways on and adjacent to the Project site would not result in any new impacts to the environment beyond that which is already disclosed and mitigated by this EIR, and a less-than-significant impact would occur.

No known other facilities would require off-site construction or maintenance as a result of the proposed Project.

Based on the foregoing analysis, impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required.

### 4.20.5 Cumulative Impact Analysis

The cumulative study area used for the analysis of water and wastewater includes areas within EMWD's service area for water and wastewater services, and is based on the buildout of the County General Plan and the general plans of cities within EMWD's service area. The cumulative study area for solid waste comprises western Riverside County, as all areas of western Riverside County are served by WMIE, based on the buildout of the County General Plan and the general plans of cities within western Riverside County. For the remaining issue areas, the cumulative impact analysis considers development of the Project in conjunction with other development projects and planned development in the vicinity of the Project site.

As discussed under the analysis of Threshold a., the Project would require a number of improvements related to water, wastewater treatment, and storm drainage systems, although such improvements are inherent to the Project's construction phase. Cumulatively-considerable impacts associated with Project construction activities have been evaluated throughout this EIR, and where necessary mitigation measures have been identified to reduce the Project's cumulatively-considerable effects to the maximum feasible extent. There are no components of the Project's proposed water, wastewater, or storm drainage systems that could result in impacts not already evaluated by other sections of this EIR. Accordingly, impacts associated with the construction of new or expanded water, wastewater treatment, and stormwater drainage systems would be less-than-cumulatively considerable.

The analysis of Threshold b., which is based on the Project-specific WSA (*Technical Appendix M*), demonstrates that the EMWD would have sufficient water supplies available to serve the Project as well as other reasonably foreseeable future development during normal, dry, and multiple dry years. Because the WSA evaluates the water demands of both the Project and other cumulative developments within EMWD's service area, the WSA demonstrates that cumulatively-considerable impacts due to water supply would be less than significant.

As discussed under the analysis of Threshold c. and d., the Project would require a number of improvements to provide sewer service to the Project site, although impacts associated with such improvements are inherent to the Project's construction phase. Cumulatively-considerable impacts associated with Project construction activities have been evaluated throughout this EIR, and where necessary mitigation measures have been identified to reduce the Project's cumulatively-considerable effects to the maximum feasible extent. There are no components of the Project's proposed wastewater improvements that could 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.

Although the Project and other cumulative developments ultimately would contribute to the need for expanded capacity at the Temecula Valley RWRF, impacts associated with such expansion would be subject to CEQA once plans for such expansion have been prepared by the EMWD. As no such plans are currently available, it would be speculative to evaluate potential cumulatively-considerable impacts associated with the proposed expansion. As such, Project impacts due to wastewater capacity would be less-than-cumulatively considerable.

As previously discussed in the analysis provided under Threshold e., solid waste generated by construction and operation of the Project would represent nominal proportions of the daily disposal capacity at the MVTS, El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill. The transfer station and landfills are currently projected to remain open until as far into the future as 2095 (El Sobrante Landfill and Badlands Land Fill) and have sufficient daily capacity to handle solid waste generated by the Project and other cumulative developments both during construction and long-term operation. The Project would not directly result in the need for expanded solid waste disposal facilities, as the MVTS, El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill have sufficient existing capacity to handle solid waste generated by the Project. Rather, the Project's incremental contribution to solid waste generation may contribute to an ultimate need for expanding the solid waste disposal facilities that would serve the Project and/or the construction of additional solid waste disposal facilities. Moreover, it is possible that as other developments in the region are proposed, the RCDWR and 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 (State CEQA Guidelines § 15145). Therefore, the Project's cumulative impacts to solid waste disposal facilities are evaluated as less than significant.

The Project would adhere to regulations set forth by local and State regulations (including AB 341 and AB 939) during both construction and long-term operations. Other cumulative developments also would be required to comply with such regulations. As such, the Project as well as other cumulative developments in the area would not result in cumulative impacts with respect to compliance with federal, State, and local statutes and regulations related to solid wastes. Impacts would be less-than-cumulatively considerable.

Cumulatively-considerable impacts associated with the provision of facilities for electricity, natural gas, communications systems, storm water 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 storm water 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. As such, with the mitigation measures specified in this EIR, Project impacts due to water, sewer, and drainage improvements would be less than significant. Additionally, the Project's wastewater generation would represent approximately 1.8% of the Temecula Valley RWRF's current excess capacity, and would represent 1.1% of the ultimate planned excess capacity. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Temecula Valley RWRF, and impacts would therefore be less than significant.

Threshold b.: Less-than-Significant Impact. Based on present information and the assurance that MWD is engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, EMWD has determined that it will be able to provide adequate water supplies to meet the potable water demand for the proposed Project as part of its existing and future demands. (EMWD, 2021d) Accordingly, sufficient water supplies are available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Furthermore, the use of recycled water on-site would serve to further reduce the Project's water demand. The Project's effect on EMWD's regional water network would be less than significant.

Thresholds c. and d.: Less-than-Significant Impact. Impacts associated with the Project's proposed sewer 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 sewer improvements. As such, with the mitigation measures specified in this EIR, Project impacts due to proposed sewer improvements would be less than significant. Additionally, the Project's wastewater generation would represent approximately 1.8% of the Temecula Valley RWRF's current excess capacity, and would represent 1.1% of the ultimate planned excess capacity. Accordingly, the Project would not result in or require the expansion of the existing facilities at the Temecula Valley RWRF, and impacts would therefore be less than significant.

Threshold e.: Less-than-Significant Impact. Regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project's construction and operational phases. The Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Accordingly, impacts would be less than significant.

Threshold f.: Less-than-Significant Impact. With mandatory compliance to AB 939, AB 341, and RCDWR's programs and policies, the Project would not result in a significant impact due to noncompliance with regulations related to solid waste. A less-than-significant impact would occur.

Threshold g.: Less-than-Significant Impact. Impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required.

## 4.20.7 Regulations, Design Requirements, and Mitigation

***Regulations and Design Requirements***

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

- The Project is required to comply with the provisions of the California Solid Waste Integrated Waste Management Act, (AB 939, 1989) 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. This Act 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 the 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 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. 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, etc.) shall apply. Project impacts to utilities and service systems would be less than significant with implementation of the mitigation measures identified throughout this EIR; therefore, no additional mitigation is required.

## 4.20.8 References


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# 4.21 WILDFIRE

Information in this Subsection is based in part on a technical study for wildfire protection titled, "Preliminary Fire Protection Plan Keller Crossing - Tract 38163" (herein, "FPP"), prepared by Firewise 2000, LLC, dated February 6, 2026, and included as *Technical Appendix N*. (Firewise 2000, 2026) 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 currently used for agricultural production. 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 the 2024 Fire Hazard Severity Zone maps adopted by CalFire, and as shown on Figure 4.21-1, *Wildfire Susceptibility,* the Project site is located entirely within a State Responsibility Area (SRA) and the majority of the site is classified as having a "Very High" Fire Hazard Severity Zone classification. Portions of the southern and southeastern portions of the site are classified as having "High" and "Moderate" Fire Hazard Severity Zones. Adjacent lands to the north, northeast, southwest, and west also predominantly are classified as having "Very High" susceptibility to fire hazards, reflecting the broader area's elevated susceptibility to wildland fire hazards. (CalFire, 2024)

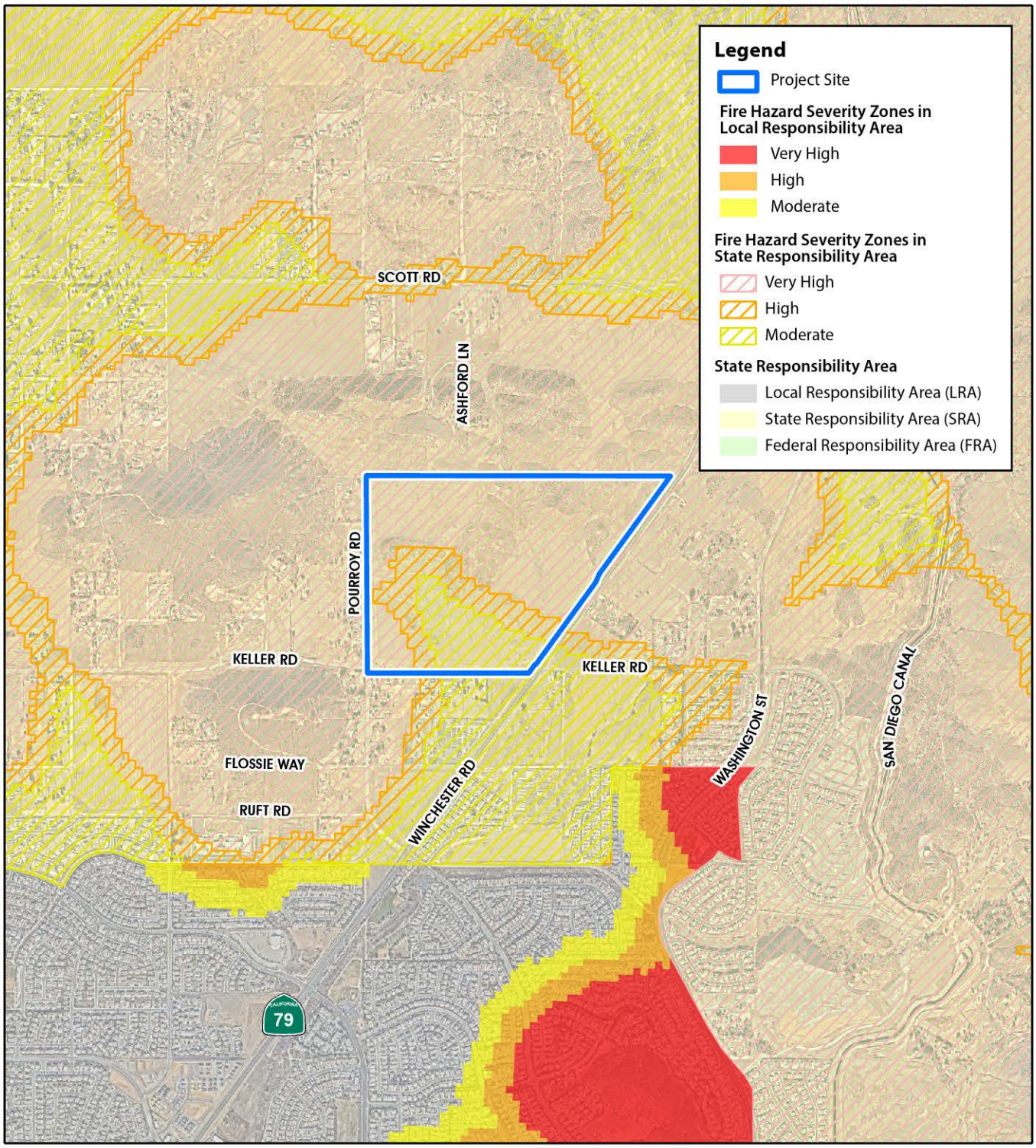
### B. Topography

As previously shown on EIR Figure 2-8, the southern portion of the Project site exhibits relatively level topography, with the remaining northern portions of the site containing undulating small hill forms. Elevations on site range from approximately 1,587 feet above mean sea level (amsl) near the northeastern corner of the Project site to 1,422 feet amsl at the southeastern corner of the Project site. The overall topographic relief is approximately 165 feet. (GeoTek, Inc, 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 usually are 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 2000, 2026, p. 4)

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 RAWS to the Project is the Clark RAWS located at Latitude 33° 52' 36" N and Longitude 117° 18' 32" W at an elevation of 1,720 feet. This is approximately 240 feet higher than the Project location. Data for all RAWS is archived in the Western Region Climate Center in Reno, Nevada. (Firewise 2000, 2026, p. 4)




Source(s): Esri; Nearmap Imagery (January 2025); RCIT, n.d.; CAL FIRE (March 2025)

Figure 4.21-1

Wildfire Susceptibility

The typical prevailing summer time 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 readings ranging between 20% and occasionally more than 50% due to the sites proximity to onshore winds from the ocean. (Firewise 2000, 2026, p. 4)

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 evening on very hot days, especially during the normal summertime (June through September) months. (Firewise 2000, 2026, p. 4)

All other (northwest, southeast and south) wind directions may be occasionally strong and gusty; however, they generally are 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. (Firewise 2000, 2026, p. 4)

### D. Fuels (Vegetation)

Plant species that grow on the site include both native and exotic grass and weeds, buckwheat, sage, mustard and a few cactuses. The more level parts of the site have been used for agricultural purposes for decades thus the lack of higher order plants and shrubs. The typical fuel model for the climax vegetation along the northern and eastern site boundaries is a combined fuel model of SCAL 18 – Sage/Buckwheat with 1- hour fuels of 5.5 tons/acre and 10- hour fuels of 0.8 tons/acre and gr2 – Low Load Dry Climate Grass with 1- hour fuels of 0.1 ton/acre and no 10-hour fuels. The fuels along the western edge of the Project area light as the area has been periodically used for agricultural purposes. Dryland farming has occurred on the site for at least the past 30 years based on a review of aerial imagery. The vegetation over time, without a disturbance likely would reach a climax vegetation type that for fire behavior planning consists of a combined fuel model of gr2 – Low load, dry climate grass (80%) and SCAL18 – Sage/Buckwheat (20%)]. Slopes in these areas range from nearly level to 10 percent. (Firewise 2000, 2026, pp. 6-7)

### E. Fire History

Fire history is also a fire concern as it provides information as to the frequency of wildfire upon a landscape. Only one large wildland fire of over 100 acres has occurred in the Project vicinity. That was the California Fire of October 1993. It destroyed 29 structures. It was caused by a powerline during very high winds. Fire history data was obtained from CalFire. Smaller fires are not mapped and therefore are not shown. There likely have been many small fires that have burned within or adjacent to the Project. (Firewise 2000, 2026, p. 9)

### F. Project Area Fire Risk Assessment

The greatest fire concern for the proposed Project interior are embers from a fire burning outside the tract or a structure fire within the tract that could land on homes or vegetation within the tract, especially during a period of high winds with low relative humidity. The northern boundary abuts protected open space and habitat along the entire length of the northern boundary. The open space is lightly vegetated without any trees. The eastern boundary abuts Highway 79, a major four-lane highway that is nearly 80 feet in width,

shoulder to shoulder. The western boundary abuts Pourroy Road, which consists of an unimproved dirt roadway. The southern boundary currently consists of (Old) Keller Road, beyond which are existing rural residential dwelling units. The more level parts of the site have been used for agricultural purposes for decades thus the lack of higher order plants and shrubs. The typical fuel model for the climax vegetation is a combined fuel model of SCAL 18 – Sage/Buckwheat with 1- hour fuels of 5.5 tons/acre and 10- hour fuels of .8 tons/acre and GR2 – Low Load Dry Climate Grass with 1- hour fuels of 0.1 ton/acre and no 10-hour fuels. In most wind conditions a fire beginning in the open space area north of the Project will burn downhill on manufactured slopes towards the homes and or be pushed parallel to the northern subdivision boundary and therefore are a lesser concern than areas where slopes are uphill into the development. (Firewise 2000, 2026, pp. 5-9)

## 4.21.2 Applicable Regulatory Requirements

### A. Federal Regulations

#### *1. 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.

### B. State Regulations

#### *1. 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.

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.

### *2. 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, the fire prevention fee was suspended as of July 1, 2017.

### *3. 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 Section 51178, a local agency may, at its discretion, exclude from the requirements of Section 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 Section 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 Section 51182 are necessary for effective fire protection within the new area. According to Section 51182, such changes made by a local agency shall be final, and shall not be rebuttable by CalFire.

### *4. 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.).

### *5. CCR Title 24, Parts 2 and 9 – Fire Codes*

Part 2 of Title 24 of the CCR refers to the California Building Code, which contains complete regulations and general construction building standards of state adopting agencies, including administrative, fire and life safety, and field inspection provisions. Part 2 was updated in 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:

> "*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

According to Section XX of Appendix G to the CEQA Guidelines, the proposed Project would result in a significant impact to wildfire, if the Project would be located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and would:

a. *Substantially impair an adopted emergency response plan or emergency evacuation plan;*

b. *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;*

c. *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment;*

d. *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived, in part, from Section XX 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

The BehavePlus 6.0.0 Fire Behavior Prediction and Fuel Modeling System developed by USDA–Forest Service is one of the best systematic methods for predicting wildland fire behavior. The BehavePlus 6.0.0 fire behavior computer modeling system is utilized by over 90 percent of wildland fire experts nationwide. Wildland fire managers use the BehavePlus 6.0.0 modeling system to project the expected fire intensity, rate-of-spread and flame lengths with a reasonable degree of certainty for use in Fire Protection Planning. The Project's FPP relies on the BehavePlus 6.0.0. Fire Behavior Prediction Model to make the fire behavior assessments for the Project. (Firewise 2000, 2026, p. 10)

Wildland fire behavior calculations have been projected for the hazardous vegetative fuels located adjacent to and bordering the proposed development. These projections were based on "worst case" Riverside County fire weather assumptions in the vicinity of the Project area and from site observations and fuel moisture levels typically observed during the local fire season. Weather data was obtained from the RAWS (Remote Automatic Weather Station) network stations closest to the Project area. (Firewise 2000, 2026, p. 11)

The four (4) scenarios are depicted in the FPP (EIR *Technical Appendix N),* include the projected fire behavior in a surface fire burning in the projected climax vegetation under "worst case" wildland fuel and weather conditions for the Project site followed by the expected fire behavior in treated fuels. All the scenarios 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 BehavePlus program. The scenarios also show the effect of fuel modification on the Rate of Fire Spread, Flame Length, and Fireline Intensity following the completion of the required fuel treatments. (Firewise 2000, 2026, p. 11)

### 4.21.5 Impact Analysis

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| **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 the 2024 Fire Hazard Severity Zone maps adopted by CalFire, the Project site is located entirely within a State Responsibility Area (SRA) and primarily is designated as having a "Very High" Fire Hazard

Severity Zone classification, with portions of the southern and southeastern portions of the site having "High" and "Moderate" Fire Hazard Severity Zones. Lands to the northeast, north, west, and southwest of the Project site also are classified as being within a "Very High" Fire Hazard Severity Zone, while lands to the south and southeast of the Project site are classified as being within "High" and "Moderate" Fire Hazard Severity Zones. (CalFire, 2024)

In April 2023, the Riverside County Emergency Management Department (EMD) published a Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP). The purpose of the LHMP is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and human-caused hazards. The LHMP describes the County's plans for a variety of potential hazards, ranging from wildfires to tornados. However, the LHMP does not identify any emergency management facilities on the Project site, does not identify any specific evacuation routes within the Project area, and does not identify any policies or requirements specific to the Project site or surrounding areas. Rather, the LHMP provides a series of policies to be enacted by the various agencies and jurisdictions within the County in the event of emergency situations. As noted by the LHMP, "[t]here has been no development within Riverside County unincorporated areas that have increased hazard risk or vulnerability since the previous plan was adopted in 2018 (RCEMD, 2023, p. 49). Therefore, it can be concluded that developments within Riverside County that adhere to the applicable provisions of County ordinances, including design measures related to emergency access, would not result in a conflict with the LHMP. The proposed Project would be required to comply with all applicable provisions of County policies and ordinances related to public safety, including but not limited to Ordinance No. 457, which establishes the County's building and fire protection regulations and includes measures requiring the provision of adequate emergency access and other measures to address fire hazard safety.

During construction and long-term operation of the Project, adequate emergency access for emergency vehicles would be required to be maintained along public streets that abut the Project site. Furthermore, improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area, including along nearby segments of Winchester Road (SR-79) and Keller Road. As part of the County's discretionary review process, Riverside County reviewed the Project's application materials to ensure that appropriate emergency ingress and egress would be available to and from the Project site and that circulation on the Project site was 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 impacts would be less than significant.

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| **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 indicated, according to the 2024 Fire Hazard Severity Zone maps adopted by CalFire, the Project site is located entirely within an SRA and primarily is classified as having a "Very High" Fire Hazard Severity Zone classification, with portions of the southern and southeastern portions of the site having "High" and "Moderate" Fire Hazard Severity Zones. Lands to the northeast, north, west, and southwest of the Project site also are classified as being within a "Very High" Fire Hazard Severity Zone, while lands to the south and southeast of the Project site are classified as being within "High" and "Moderate" Fire Hazard Severity Zones. (CalFire, 2024)

To evaluate the Project's potential to exacerbate wildfire risks, a Project-specific Fire Protection Plan (FPP) was prepared by Firewise 2000, LLC. The results and recommendations of the FPP are summarized below. Refer to Section 3 of the Project's FPP (EIR *Technical Appendix N*) for a discussion of the methodology and fire behavior modeling used to assess fire risks in the local area. Based on the results of the FPP, Firewise recommends implementation of Fuel Modification Zones (FMZs) between proposed development areas and adjacent open space and natural vegetation. These requirements have been incorporated into Section 2.A. of proposed SP 380A1 and would be enforced by the County as part of its review of future implementing actions (e.g., grading permits and building permits). As required by proposed SP 380A1, the Project would incorporate three FMZs, as depicted on Figure 2-10, Fuel Modification Plan, of SP 380A1 (and included in this EIR as Figure 3-12). The FMZs would include:

- **Fuel Modification Zone 0:** Zone 0 would be homeowner-maintained and located within five feet of all structures, including the base of exterior walls, decks, stairs, and other attached or adjacent features. This zone shall be kept free of all combustible materials and vegetation, including mulch, artificial turf, combustible fences or gates, decorative items, firewood, and flammable yard equipment. Vehicles and equipment with combustible components would also be excluded, with the exception of standard automobiles and pickup trucks parked in driveways. The intent of Zone 0 is to reduce the probability of wind-blown embers igniting materials adjacent to structures during a wildfire. Maintenance of Zone 0 would be the responsibility of the lot owner, and this zone is not depicted on the Fuel Modification Plan Map.

- **Fuel Modification Zone 1A:** Zone 1A would be homeowner-maintained and located within individual residential lots. It shall be free of all combustible construction and materials and generally located within rear and side yards. This zone would consist of irrigated landscaping extending outward from

the building footprint and provide defensible space for structure protection and firefighter access. This zone would also include level or graded pads, minimum 10-foot separation between trees and buildings, and compliance with Table IV-1 (Community Plant Palette) and Table IV-2 (Prohibited Plant List) of SP 380A1.

- **Fuel Modification Zone 1B:** Zone 1B would be maintained by the Valley-Wide Recreation and Park District and would consist of irrigated, fire-resistant landscaping on manufactured slopes and within common areas. This zone generally extends 30 feet outward from the residential lot lines into roadways, parkways, and HOA-maintained slopes, and would be planted with drought-tolerant, fire-resistant plant species. Landscaping would conform to Table IV-1 and Table IV-2 of SP 380A1.

- **Fuel Modification Zone 2:** Zone 2 would be maintained by the Valley-Wide Recreation and Park District and would consist of non-irrigated thinning treatment, resulting in 50 percent canopy separation and removal of dead and dying vegetation. This zone would begin at the outer edge of Zones 1A or 1B and would be maintained annually prior to fire season. Vegetation in this zone must comply with the plant selection restrictions in Tables IV-1 and IV-2.

- **Roadside Fuel Treatment:** Roadside fuel treatment would be implemented along all public roads within and adjacent to the Project site, maintained by the Valley-Wide Recreation and Park District. It would include a minimum 20-foot clearance of combustible vegetation on either side of public roadways. Where applicable, temporary fuel treatment would be applied until adjacent parcels are developed. Non-combustible infrastructure such as sidewalks would be encouraged to enhance fire protection. Landscaping in these zones would comply with Table IV-1 and Table IV-2 of SP 380A1.

Due to protected open space and habitat constraints, several proposed residential homes along the northern boundaries of Planning Areas 1 and 2 of SP 380A1 (identified as Lots 19, 40, 41, 64, and 98 through 102 on proposed TTM 38163) would not be able to achieve the full 100-foot fuel modification zones. In these areas, alternative protection measures would be implemented, such as non-combustible fire deflection walls, expanded irrigated landscaping zones, or enhanced ignition-resistant building materials exceeding standard code requirements. These measures would be designed based on worst-case wildfire scenarios, including slope, wind exposure, and fuel conditions, as analyzed in the Project's FPP. (Firewise 2000, 2026, p. 21)

The above-described requirements have been incorporated into Chapter 2 of proposed SP 380A1 and would be enforced by the County as part of the Project's Conditions of Approval and through its future review of implementing developments, including consistency review with SP 380A1's fire protection requirements. As concluded by the March 2025 Fire Protection Plan, implementation of SP 380A1's fire abatement strategies including the required Fuel Modification Zones (FMZs), roadside fuel treatments, and lot-specific alternative measures where a 100-foot FMZ cannot be accommodated, combined with site design features (e.g., paved roadways, irrigated landscaping, and perimeter clearance zones), would reduce the risk of wildfire hazards to acceptable levels. For Lots 19, 40, 41, 64, and 98–102, where the full FMZ distance cannot be achieved

due to adjacency to protected open space, Section 8.0 of the FPP outlines enhanced ignition-resistant construction and other supplemental measures that would be required.

Thus, with compliance with the fire protection and fuel modification requirements of SP 380A1, the Project would not exacerbate wildfire risks, would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and would not expose people or structures either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

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| **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 discussed, according to the 2024 Fire Hazard Severity Zone maps adopted by CalFire, the Project site is located entirely within an SRA and primarily is classified as having a "Very High" Fire Hazard Severity Zone classification, with portions of the southern and southeastern portions of the site having "High" and "Moderate" Fire Hazard Severity Zones. Lands to the northeast, north, west, and southwest of the Project site also are classified as being within a "Very High" Fire Hazard Severity Zone, while lands to the south and southeast of the Project site are classified as being within "High" and "Moderate" Fire Hazard Severity Zones. (CalFire, 2024)

As described under the analysis of Thresholds b. and e., the Project includes a comprehensive fire protection strategy, including the provision of 100-foot wide Fuel Modification Zones (FMZs) where feasible, and lot-specific alternative protection measures where that required FMZs cannot be achieved. These requirements are detailed in the Project's March 2025 FPP, and compliance with the Project's FPP recommendations would be assured by future County review of implementing building permit and grading permit applications for consistency with Chapter 2 of SP 380A1. While the Project includes the installation of infrastructure such as new roadways, fuel modification areas, and utility improvements, areas subject to fuel modification would occur in areas already planned for impact as part of site development. Thus, impacts to areas requiring FMZs have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, cultural resources), and where impacts are identified mitigation measures are identified to reduce impacts to the extent feasible. There are no components of the proposed FMZs that would result in impacts not already addressed by this EIR. 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.

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| **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 discussed, according to the 2024 Fire Hazard Severity Zone maps adopted by CalFire, the Project site is located entirely within an SRA and primarily is classified as having a "Very High" Fire Hazard Severity Zone classification, with portions of the southern and southeastern portions of the site having "High" and "Moderate" Fire Hazard Severity Zones. Lands to the northeast, north, west, and southwest of the Project site also are classified as being within a "Very High" Fire Hazard Severity Zone, while lands to the south and southeast of the Project site are classified as being within "High" and "Moderate" Fire Hazard Severity Zones. (CalFire, 2024)

As discussed under Thresholds b. and e., the Project would implement 100-foot wide FMZs where feasible, with additional fire protection measures for specific lots where the full FMZ cannot be accommodated. These measures are outlined in the Project's FPP and have been incorporated into Chapter 2 of SP 380A1. Implementation of the measures detailed in proposed SP 380A1 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 required by SP 380A1 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. 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 wildfire includes areas within a five-mile radius of the Project site. This area is appropriate for analysis because wildfire events originating beyond five miles are unlikely to materially affect the Project site, and any fires originating within the Project site are unlikely to extend beyond this radius.

The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. The Project would not be used as an evacuation corridor under long-term conditions. During both construction and full buildout, the Project would be required to maintain adequate emergency vehicle access pursuant to applicable County and CalFire standards. Other cumulative development projects

within the five-mile study area would similarly be required to provide for adequate emergency access and not interfere with adopted emergency response plans. Cumulatively-considerable impacts related to emergency response and evacuation would be less than significant.

As described in the analysis of Thresholds b. and e., the Project would be required to comply with the fire protection strategies set forth in the March 2025 Fire Protection Plan and codified in Chapter 2 of proposed SP 380A1. These include implementation of FMZs, roadside fuel treatments, and lot-specific alternative protection measures where the full 100-foot FMZ cannot be achieved. Compliance with these fire safety requirements would ensure that the Project does not exacerbate wildfire hazards or expose people or structures to significant risk of loss, injury, or death due to wildfire. Other cumulative development projects would also be required to address fire hazards in accordance with State and local codes. Project impacts related to regional wildfire hazards would be less than cumulatively considerable.

As described in the analysis of Threshold c., the areas proposed for fuel modification would occur within areas already proposed for ground disturbance as part of the Project's development footprint, including roadway corridors, manufactured slopes, parkways, and landscape areas. Impacts associated with FMZ implementation have been evaluated under the appropriate resource sections of this EIR (e.g., biological resources, cultural resources). Where impacts were identified, mitigation measures have been included to reduce those impacts to the extent feasible. Other future development projects within the cumulative study area that involve installation or maintenance of fire protection infrastructure would similarly be required to evaluate and mitigate associated physical impacts. Accordingly, cumulatively-considerable environmental impacts from the Project's fire protection infrastructure would be less than significant.

As described in the analysis of Threshold d., the Project would substantially reduce on-site wildfire risk through defensible space, ignition-resistant construction, and appropriate site design. Additionally, Project runoff, including post-fire runoff, would be captured and managed by the Project's proposed drainage system, which includes detention basins and water quality features to control flow and minimize downstream erosion or sedimentation. The site does not include or abut steep hillsides or geologic features that would be prone to landslides (i.e., mass wasting), either under baseline or post-fire conditions. Therefore, cumulatively-considerable impacts related to post-fire slope instability, flooding, or landslides 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 designated as emergency evacuation routes, and there are no adopted emergency response or evacuation plans specific to the Project area. During both construction and full buildout, the Project would be required to maintain adequate emergency vehicle access consistent with County and CalFire requirements. Therefore, the Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Thresholds b. and e.: Less than Significant Impact. The Project would be subject to the fire protection requirements set forth in Chapter 2 of proposed SP 380A1 and detailed in the Project's March 2025 Fire

Protection Plan (*Technical Appendix N*), including the provision of 100-foot-wide Fuel Modification Zones (FMZs) where feasible, and enhanced fire protection measures for specific lots where the full FMZ cannot be achieved. With mandatory compliance with these requirements, including defensible space, roadside fuel treatments, and ignition-resistant construction, the Project would not exacerbate wildfire risks, would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of fire, and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. The Project also would accommodate adequate circulation features to allow for site evacuation in the event of a wildfire. Impacts would be less than significant.

Threshold c: Less than Significant Impact. Areas proposed for fuel modification occur entirely within the Project's development footprint, including manufactured slopes, landscaped corridors, and parkways. Environmental impacts associated with fuel modification areas have been fully evaluated under the applicable subject areas of this EIR (e.g., biological and cultural resources), and mitigation measures have been provided where necessary to reduce impacts to a less-than-significant level. There are no components of the Project's fire protection infrastructure that would result in new or unanalyzed environmental impacts. As such, the Project would not exacerbate fire risk nor result in environmental impacts beyond those already disclosed in this EIR. Impacts would be less than significant.

Threshold d: Less than Significant Impact. Although extreme wildfire conditions could still occur in the region, the Project includes enhanced fire-resistant construction features and fuel modification measures as required by SP 380A1 and the Fire Protection Plan, which would reduce on-site wildfire risk to less-than-significant levels. In addition, the Project site's gentle topography and proposed drainage infrastructure, including detention basins and stormwater controls, would prevent post-fire runoff from causing downstream flooding or erosion. The Project site is not susceptible to landslides, including those that could be triggered by post-fire slope instability. Therefore, the Project would not expose people or structures to significant risks associated with wildfire-related geologic or hydrologic hazards. Impacts would be less than significant.

## 4.21.8 Regulations, Design Requirements, and Mitigation

***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.

- Future implementing developments within the Project site (e.g., plot plans, building permits, etc.) shall be reviewed by Riverside County for compliance with the fire protection measures included in Section 2.H, *Fuel Modification Plan*, of SP 380A1.

***Mitigation***

No significant environmental impacts related to wildfire hazards would occur due to the Project. No mitigation measures are required.

## 4.21.9 References


| Cited As | Reference |
|---|---|
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| Firewise 2000, 2026 | Firewise 2000, LLC. 2026. *Fuel Modification Plan Keller Crossing*. February 6, 2026. Included as *Technical Appendix N* to this EIR. |
| GeoTek, 2021 | GeoTek, Inc. (GeoTek), 2021. *Updated Geotechnical and Infiltration Evaluation, Proposed Single-Family Residential Development, Keller Crossing Project, Northwest Corner of Winchester Road and Keller Road, Winchester Area of County of Riverside, California" (herein, "Geotechnical Update")*. May 25, 2021. |
| RCEMD, 2023 | Riverside County Emergency Management Department, 2023. *County of Riverside Operational Area Multi-Jurisdictional Hazard Mitigation Plan, Version 8.7.23*. April 2023. Accessed June 26, 2025. Available online at: https://rivcoready.org/sites/g/files/aldnop181/files/2023-08/MJLHMP%208.7.23.pdf |

# 5.0 OTHER CEQA CONSIDERATIONS

California Environmental Quality Act (CEQA) Guidelines Section 15126 requires that all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. It also sets forth general content requirements for environmental impact reports (EIRs). Potential significant effects of the proposed Project; mitigation measures to address these effects and potential cumulative impacts have been identified throughout the analysis presented in Subsections 4.1 through 4.21 of this EIR. An analysis of alternatives is included in Section 6.0, Alternatives.

This section provides: (1) identification of significant environmental effects that cannot be avoided if the Project is implemented, (2) identification of significant irreversible environmental changes that would result from implementing the Project, and (3) growth-inducing impacts of the Project.

## 5.1 SIGNIFICANT EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

The 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, *Environmental Analysis*, of this EIR, the Project is anticipated to result in one (1) impact to the environment that cannot be reduced to below a level of significance after compliance with applicable federal, State and local regulations and the application of the feasible mitigation measures identified in this EIR. The impact that cannot be mitigated to a level of less than significant is as follows:

- Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Buildout of the residential uses proposed as part of the Project would result in a VMT per capita of 32.2, which exceeds the County's VMT per capita threshold of significance of 15.2 by approximately 211.8 percent. In addition, the cumulative Project-generated VMT per capita would be approximately 27.9, which would exceed the County's impact threshold of 15.2 by approximately 183.6%. As such, prior to mitigation, the proposed Project would result in a significant direct and cumulatively considerable impact related to VMT. Although the Project includes pedestrian and bicycle infrastructure such as trails, bike lanes, and sidewalks that support non-vehicular travel and contribute to internal trip reduction, these features are not sufficient to reduce the Project's VMT per capita to a level below the County's significance threshold. Although the Project includes some features, such as the provision of pedestrian and bicycle facilities, designing intersections to accommodate pedestrians and bicycles, and collaboration with the Riverside Transit Authority (RTA) on expanded transit service, the addition of the aforementioned design features likely would result in a modest decrease (under 5%) in VMT and would not reduce Project-generated VMT below the County's impact threshold. Accordingly, because the Project would not meet any of the County Guidelines screening criteria, and because the Production/Attraction (PA) home-based (HB) VMT per capita would exceed the County's VMT impact threshold for both baseline and cumulative conditions, even with the inclusion of feasible design features intended to reduce project-generated

VMT, Project impacts due to VMT represent a significant and unavoidable impact for which mitigation is not available.

## 5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The State CEQA Guidelines require EIRs to address any significant irreversible environmental changes that would be involved with 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 environment 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 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 Building Standards Code (CALGreen), compliance with which reduces a building operation's energy demand. The Project also would be subject to regulations to reduce the Project's reliance on non-renewable energy sources, and 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. The Project would avoid the inefficient, wasteful, and unnecessary consumption of energy during Project construction, operation, maintenance, and/or removal, as more fully documented in EIR Subsection 4.6, *Energy*. With mandatory compliance to applicable energy efficiency regulations, the Project would not involve the use of large sums or sources of non-renewable energy.

EIR Subsection 4.8, *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 to the environment. As concluded in the analysis, compliance with federal, State, and local regulation related to hazardous materials would be required of all contractors working on the property during the Project's construction and of all the residents that occupy the Project's buildings. As such, construction and long-term operation of the proposed Project would not have the potential to cause significant irreversible damage to the environment, including damage that may result from upset or accident conditions.

## 5.3 GROWTH INDUCING IMPACTS

CEQA requires a discussion of the ways in which the Project could 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 (CEQA Guidelines § 15126.2[d]). New employees and new residential populations represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area, placing additional demands on public services and infrastructure systems, and in the generation of a variety of environmental impacts, which are addressed throughout Section 4.0, *Environmental Analysis*.

To address this issue, potential growth-inducing effects are examined through analysis of the following questions (CEQA Guidelines § 15126.2 [e]):

1. Would this project remove obstacles to population growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area or through changes in existing regulations pertaining to land development)?
2. Would this project result in the need to expand one or more public services to maintain desired levels of service?
3. Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
4. Would approval of this project involve some precedent setting action that could encourage and facilitate other activities that could significantly affect the environment?

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 environs where population growth results in increased demand for service and commodity markets responding to the new population of residents or employees.

Typically, growth-inducing potential of a project would be considered significant if the Project fosters growth or a concentration of population in excess of what is assumed in local and regional land use plans and population projections. 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. Further, growth inducement 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 residential, agricultural, open space uses, and undeveloped land within unincorporated Riverside County. Development of the Project site with residential and recreational land uses would not directly induce surrounding properties to develop, because

areas surrounding the Project site to the south, southwest, and west are already developed with residential uses, while other lands in the Project vicinity already are planned for urban development. 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 IMPACTS CONSIDERED LESS THAN SIGNIFICANT

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

## 6.1 INTRODUCTION

CEQA Guidelines Section 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 selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.*

As discussed in Section 4.0, *Environmental Analysis*, the Project would result in significant adverse environmental effects associated with Transportation that cannot be mitigated to below levels of significance after the implementation of feasible mitigation measures. The Project's significant and unavoidable impacts are summarized below in Section 6.1.2.

- Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Buildout of the residential uses proposed as part of the Project would result in a VMT per capita of 32.2, which exceeds the County's VMT per capita threshold of significance of 15.2 by approximately 211.8 percent. In addition, the cumulative Project-generated VMT per capita would be approximately 27.9, which would exceed the County's impact threshold of 15.2 by approximately 183.6%. As such, prior to mitigation, the proposed Project would result in a significant direct and cumulatively considerable impact related to VMT. Although the Project includes pedestrian and bicycle infrastructure such as trails, bike lanes, and sidewalks that support non-vehicular travel and contribute to internal trip reduction, these features are not sufficient to reduce the Project's VMT per capita to a level below the County's significance threshold. Although the Project includes some features, such as the provision of pedestrian and bicycle facilities, designing intersections to accommodate pedestrians and bicycles, and collaboration with the Riverside Transit Authority (RTA) on expanded transit service, the addition of the aforementioned design features likely would result in a modest decrease (under 5%) in VMT and would not reduce Project-generated VMT below the County's impact threshold. Accordingly, because the Project would not meet any of the County Guidelines screening criteria, and because the Production/Attraction (PA) home-based (HB) VMT per capita would exceed the County's VMT impact threshold for both baseline and cumulative conditions, even with the inclusion of feasible design features intended to reduce project-generated

VMT, Project impacts due to VMT represent a significant and unavoidable impact for which mitigation is not available.

## 6.2 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 (State 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 (Adopted Specific Plan) Alternative."

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

### 6.2.1 No Project/No Development

The No Development Alternative (NDA) considers no development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the Project site would continue to consist of approximately 196.1 acres of vacant and undeveloped land, portions of which would continue to be used for dryland farming. 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.

### 6.2.2 No Project (Adopted Specific Plan) Alternative (NPA)

The No Project (Existing Specific Plan) Alternative (herein, "NPA"), assumes development of the Project site in accordance with the site's existing General Plan and Specific Plan land uses. Figure 2-5 in EIR Subsection 2.0 depicts the site's existing Specific Plan land use designations. Thus, under this alternative, and consistent with the adopted Keller Crossing Specific Plan No. 380 (SP 380), the Project site would be developed with 3 VLDR dwelling units on 9.9 acres; 25 LDR dwelling units on 18.3 acres; 42 MDR dwelling units on 13.9 acres; 39.5 acres of Mixed Use, including 250 dwelling units and 250,000 square feet (s.f.) building area; 400,000 s.f. of CR uses on 37.8 acres; 61.1 acres of OS-C uses; and 20.6 acres of major circulation facilities. 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 SP 380 land use designations.

### 6.2.3 Reduced Project Alternative (RPA)

The Reduced Project Alternative (RPA) was selected to evaluate a development scenario that is less intensive than the proposed Project and that could avoid the Project's significant and unavoidable Vehicle Miles Traveled (VMT) impact. Based on the Riverside County 2020 *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled* (herein, "County Guidelines), single-family residential developments with 110 or fewer dwelling units and multi-family residential developments (low rise) with fewer than 147 dwelling units are presumed to have a less-than-significant impact due to VMT, as development of 110 single-family dwelling units or 147 multi-family (low rise) dwelling units would result in the emissions of Greenhouse Gases (GHGs) that would be at or below 3,000 Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$) per year, and such developments are presumed to have a less-than-significant impact due to VMT. Given that the ratio between Project-generated VMT and the Project's anticipated population would not substantially change in relation to the proposed Project, it would not be feasible to propose an alternative that would exceed the 110 single-family dwelling unit threshold identified by the County Guidelines while still avoiding impacts due to VMT. This is because any alternative exceeding 110 dwelling units likely would result in a similar ratio of VMT to service population as the proposed Project, meaning any alternative to the Project that includes more than 110 single-family dwelling units would result in significant and unavoidable impacts due to VMT similar to the Project's significant and unavoidable VMT impacts. Accordingly, the RPA considers development of the Project site with up to 110 single-family dwelling units within the 87.37 acres of the Project site that are proposed for residential uses as part of the proposed Project. Under the RPA, residential dwelling units on site would have an average lot size of approximately 34,638 s.f. (0.8-acre). All other components of the RPA would be similar to the proposed Project, and would include a 8.88-acre park site, 3.49 acres of Open Space – Conservation (OS-C), 61.42 acres of Open Space – Conservation Habitat (OS-CH), 16.00 acres of Open Space – Water (OS-W), and approximately 18.89 acres of public backbone roadways. The purpose of the RPA is to reduce total daily vehicle trips, VMT per capita, and associated air quality and greenhouse gas emissions, while still achieving at least some of the Project's core objectives. The RPA would retain the overall Specific Plan structure and development pattern of the proposed Project, but at a substantially reduced residential density.

## 6.3 ALTERNATIVES CONSIDERED AND REJECTED

An EIR is required to identify any alternatives that were considered by Riverside County but were rejected as infeasible. Factors described by CEQA Guidelines Section 15126.6 in determining whether to exclude alternatives from detailed consideration in the EIR include: a) failure to meet most of the basic project objectives, b) infeasibility, or c) inability to avoid significant environmental impacts. With respect to the feasibility of potential alternatives to the Project, CEQA Guidelines Section 15126.6(f)(1) notes:

> *"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site…"*

In determining an appropriate range of alternatives to be evaluated in this EIR, a number of possible alternatives were initially considered and, for a variety of reasons, rejected. Pursuant to Section 15126.6(c) of the CEQA guidelines, alternatives were rejected because: 1) they failed to meet most of the basic objectives of the Project, 2) they would not avoid significant environmental impacts, or 3) they were considered infeasible to construct or operate. A summary of the alternatives that were considered but rejected are described below.

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 buy rejected are described below.

### 6.3.1 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"* (State 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 196.1 acres) that are zoned for and adjacent to other properties designated for urban development and that would reduce or avoid the Project's significant and unavoidable impacts due to VMT. Construction of the Project at a different site location likely would result in similar or more severe impacts at off-site locations that are located further from regional transportation facilities and/or urban areas. Additionally, there are no properties under the control of the Project Applicant of sufficient size (i.e., approximately 196.1 acres) and that are located within areas of Riverside County that exhibit a low average VMT. Furthermore, even if the proposed Project were to be developed at a different site location, it is likely that development on the Project site still would occur in conformance with the Project site's existing General Plan and SP 380 land use designations, and such development also would result in unavoidable impacts due to VMT. 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 feasibly reduce or avoid the Project's significant environmental effects due to VMT.

## 6.4 ANALYSIS OF ALTERNATIVES

Riverside County has identified the following alternatives as a range of reasonable alternatives to the Project in accordance with CEQA Guidelines Section 15126.6. These alternatives are described in more detail and their respective potential level of environmental effects has been compared to the Project's environmental effects.

The following discussion compares the impacts of each alternative considered by Riverside County with the impacts of the Project, as detailed in Section 4.0, *Environmental Analysis*, of this EIR. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), CEQA Guidelines Section 15126.6(c) requires that the discussion of alternatives focus on alternatives which are capable of avoiding or substantially lessening the significant effects of the Project. Therefore, the analysis provided herein focuses on a comparison of the Project's significant impacts to the level of impact that would occur under each evaluated alternative. The Project's significant and unavoidable impacts fall under the topic of Transportation. Although the Project's less-than-significant impacts also are compared to the alternatives evaluated herein, the emphasis of the comparative discussion in this analysis relates to the significant impacts of the Project that require mitigation as required by CEQA. A conclusion is provided for each significant impact of the Project as to whether the alternative results in one of the following: (1) reduction or elimination of the Project's impact, (2) a greater impact than would occur under the Project, (3) the same impact as the Project, or (4) a new impact in addition to the Project's impacts.

Table 6-1, *Comparison of Alternatives and Project-related Environmental Impacts*, at the end of this Section compares the significant impacts of the Project with the level of impact that would be caused by each of the alternatives evaluated herein. Table 6-1 identifies the ability of each alternative to meet the fundamental purpose and basic objectives of the Project.

A. To efficiently develop an underutilized property with a complementary mix of land uses, including residential, recreational, and open space land uses.

B. To establish a master-planned community in a manner that is sensitive to the environment as well as visually and functionally compatible with surrounding existing and proposed land uses.

C. To develop a master-planned 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 and age-qualified multi-family homes that will be marketable within the evolving economic profile of Riverside County and surrounding communities.

E. 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.

F. To require project design elements such as architecture, landscaping, color, paving, walls, fencing, signage, entry treatments, and other similar design features that would ensure the community is developed in a manner that is aesthetically pleasing.

G. To establish development phasing that results in logical coordinated growth.

### 6.4.1 No Development Alternative

The No Development Alternative (NDA) considers no development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the Project site would continue to consist of approximately 196.1 acres of vacant and undeveloped land, portions of which would continue to be used for dryland farming. 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 approximately 196.1-acre site would remain vacant and undeveloped. Thus, the Project's less-than-significant impacts to scenic vistas would be avoided under this Alternative. The Project site is not visible from any officially-designated scenic highways; thus, no impacts to scenic highways would occur and impacts would be similar to the proposed Project. Although the Project is not expected to degrade 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. Although the Project would be subject to compliance with Riverside County Ordinance Nos. 655 and 915 and 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. Thus, implementation of the NDA would avoid the Project's less-than-significant impacts due to the conversion of approximately 163.5 acres of "Farmland of Local Importance" and 32.6 acres of "Other Lands" to non-agricultural use. Neither the Project nor the NDA would result in a conflict with existing agricultural zoning, land subject to a Williamson Act, or a Riverside County Agricultural Preserve, and impacts would be less than significant and similar. 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.

Implementation of the NDA also would avoid the Project's less-than-significant impacts due to the conversion of existing agricultural uses on site to non-agricultural use. 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. As such, implementation of the NDA would avoid the Project's less-than-significant impacts (after mitigation) due to a conflict with the South Coast Air Quality Management District (SCAQMD) 2022 Air Quality Management Plan (AQMP). Additionally, the NDA would not result in any construction or operational emissions and therefore would avoid the Project's less-than-significant construction-related air quality impacts (after mitigation) and the Project's less-than-significant impacts due to long-term operational emissions. Implementation of the NDA also would avoid the Project's less-than-significant operational impacts due to CO "hot spots" and construction-related impacts due to Toxic Air Contaminants (TACs). Similarly, the Project's less-than-significant impacts due to construction or operational related odor emissions would be avoided under the NDA.

### 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 potential conflict with the MSHCP (prior to mitigation). The NDA also would not result in any construction-related impacts to nesting birds or the burrowing owl. The NDA also would avoid the Project's significant but mitigable impacts to 0.36-acre of Regional Board Waters of the State, 0.44 acre of CDFW jurisdiction, and 0.44-acre of MSHCP riparian/riverine resources.

### E. Cultural Resources

Under the NDA, no new development would occur on site. Although the Project would not result in impacts to any known historical resources, the NDA would nonetheless avoid the Project's less-than-significant impacts (following mitigation) to subsurface historical resources that may be encountered during grading activities. Similarly, although there are no known archaeological resources on site, the NDA would avoid the Project's less-than-significant impacts (after mitigation) to subsurface archaeological resources that may be impacted during site grading operations. Additionally, because there would be no new grading on site, the NDA would avoid the Project's less-than-significant impacts 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 & Soils

Under the NDA, there would be no new development on 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. 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 reduced 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 unstable geologic units or soils that are unstable and that potentially could result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazard. The Project's less-than-significant impacts (with mitigation) due to ground subsidence also would be reduced under the NDA. Neither the Project nor the NDA would be subject to geologic hazards, such as seiches, mudflow, or volcanic hazards; impacts would be less than significant and the level of impact 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 waste water 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 development or construction activities on site. As such, the NDA would completely avoid the Project's less-than-significant impacts (after mitigation) due to Greenhouse Gas (GHG) emissions. Similarly, the Project's less-than-significant impacts (after 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 & 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. 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

With respect to water quality, the NDA would not involve any new development on site. With exception of erosion potential, the NDA would result in reduced impacts to water quality as compared to the proposed Project's less-than-significant water quality impacts. 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 vegetative cover on portions of the Project 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, 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 not be consistent with the land use designations applied to the property by the Riverside County General Plan, Southwest Area Plan (SWAP), and SP 380, and impacts would be increased as

compared to the proposed Project. Neither the Project nor the NDA would conflict with the Southern California Association of Governments (SCAG) 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (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 site is located outside of areas subject to public and private airport-related noise levels exceeding 55 dBA CNEL; thus, impacts due to airport-related noise would be less than significant under both the Project and the NDA. The NDA also would avoid the Project's less-than-significant impacts (after mitigation) 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 and also would avoid the Project's less-than-significant impacts due to operational-related vibration.

### 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

Neither the Project nor the NDA would eliminate any residents or housing or generate any demand for additional housing. Thus, impacts due to the displacement of substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, would be less than significant under both the Project and the NDA. The NDA would not generate any demand for additional housing, including affordable housing, while the Project would accommodate 694 dwelling units on site, including 80 High Density Residential units that would be affordable to lower-income residents; thus, impacts due to the displacement of substantial numbers of people or housing would be less than significant under both the NDA and the Project, and the level of impact 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 8.88 acres of parkland on site, 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 and would avoid the Project's less-than-significant impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system. Additionally, due to the lack of improvements, the NDA would avoid the Project's less-than-significant impacts due to increased hazards due to geometric design features 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 (after mitigation) to circulation during construction activities on site. 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 (after mitigation) impacts 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.

### S. Tribal Cultural Resources

There would be no new development on site under the NDA. Accordingly, the NDA would avoid the Project's less-than-significant impacts (after mitigation) to tribal cultural resources.

### T. Utilities and Service Systems

Under the NDA, there would be no increased demand for water, wastewater treatment, or storm water 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 CIWMP (County Integrated Waste Management Plan); 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, 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 with implementation of the Project's Fuel Modification Zones (FMZs), the NDA would result in reduced impacts due to wildfires because the NDA would not involve the construction of any new structures or fire protection measures on site. 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, 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 this Alternative, although a few new impacts, such as sedimentation impacts, General Plan land use consistency, and wildfire hazards (on site) would be increased under this Alternative. Because this Alternative would avoid most of the Project's impacts, it warrants consideration as the "environmentally superior alternative." However, pursuant to 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 Reduced Project Alternative, as discussed in subsection 6.4.3, is identified as the environmentally superior alternative.

The NDA would fail to meet any of the Project's objectives. The NDA would not meet the Project's objective to efficiently develop an underutilized property with a complementary mix of land uses, including residential, recreational, and open space land uses. The NDA also would not meet the Project's objective to establish a master-planned community in a manner that is sensitive to the environment as well as visually and functionally compatible with surrounding existing and proposed land uses. 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 master-planned community. The NDA also would not meet the Project's objective to increase the available housing supply within the region by providing detached single-family homes and age-qualified multi-family homes that will be marketable within the evolving economic profile of Riverside County and surrounding communities. The NDA 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 and meet the needs of Project residents and residents of surrounding communities. Additionally, the NDA would not meet the Project's objective to require project design elements such as architecture, landscaping, color, paving, walls, fencing, signage, entry treatments, and other similar design features that would ensure the community is developed in a manner that is aesthetically pleasing. Finally, the NDA would not meet the Project's objective to establish development phasing that results in logical coordinated growth.

### 6.4.2 No Project (Adopted Specific Plan) Alternative (NPA)

The No Project (Existing Specific Plan) Alternative (herein, "NPA"), assumes development of the Project site in accordance with the site's existing General Plan and Specific Plan land uses. Figure 2-5 in EIR Subsection 2.0 depicts the site's existing Specific Plan land use designations. Thus, under this alternative, and consistent with the adopted Keller Crossing Specific Plan No. 380 (SP 380), the Project site would be developed with 3 VLDR dwelling units on 9.9 acres; 25 LDR dwelling units on 18.3 acres; 42 MDR dwelling units on 13.9 acres; 39.5 acres of Mixed Use, including 250 dwelling units and 250,000 square feet (s.f.) building area; 400,000 s.f. of CR uses on 37.8 acres; 61.1 acres of OS-C uses; and 20.6 acres of major circulation facilities. 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 SP 380 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 or State-Eligible 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; result in the creation of an aesthetically offensive site open to public view; or conflict with applicable zoning and other regulations governing scenic quality. Mandatory compliance with the adopted or proposed SP 380 also would ensure that the Project and NPA do not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and both the Project and the NPA would be required to comply with all applicable zoning and other regulations governing scenic quality. Impacts would be less than significant, and the level of impact would be similar. Both the Project and NPA would be subject to compliance with Riverside County Ordinance Nos. 348, 655, and 915, as well as the development standards and design guidelines of the approved or proposed SP 380, 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

Areas proposed for physical impact under the NPA would be similar to the proposed Project. Neither the Project nor the NPA would result in impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; thus, no impact would occur under either the Project or the NPA, and the level of impact would be similar. Neither the Project nor the NPA would result in a conflict with existing agricultural zoning or land subject to a Williamson Act or Riverside County Agricultural Preserve, and impacts would be less than significant and similar. Both the Project and NPA would entail development of urban land uses within 150

feet of agriculturally-zoned property; however, both the Project and the NPA would be subject to compliance with Riverside County Ordinance No. 625. Mandatory compliance with Ordinance No. 625 would ensure that indirect impacts to agricultural lands are less than significant, and impacts would be the same under the Project and NPA. There are no other components of the Project or NPA that could result in the conversion of Farmland to non-agricultural use; thus, impacts would be less than significant and the level of impact would be similar. Neither the Project nor the NPA would result in impacts due to the conversion of forest land to non-forest uses, and the level of impact would be the same.

### C. Air Quality

A majority of the air quality emissions that would be associated with the Project and the NPA would be associated with vehicular traffic. Based on a traffic impact analysis prepared in conjunction with the adoption of the original SP 380, the adopted land uses for the Project site would generate approximately 20,317 Average Daily Trips ("ADT"; refer to Table 3.15-3 of EIR No. 525, which was prepared in conjunction with the adopted SP 380), whereas the proposed Project would result in approximately 5,968 ADT (refer to EIR Table 3-4). As such, it can be concluded that overall operational air quality emissions would be increased under the NPA as compared to the proposed Project, and that such increased emissions likely would exceed the SCAQMD Regional Thresholds for Volatile Organic Compounds (VOCs), Oxides of Nitrogen ($NO_X$), Carbon Monoxide (CO), and Particulate Matter smaller than 10 microns ($PM_{10}$). Thus, implementation of the NPA likely would result in a significant and unavoidable impact due to a conflict with the SCAQMD AQMP. While construction-related emissions would be similar under the Project and NPA and would not exceed the SCAQMD Regional Thresholds with the implementation of mitigation measures, because the NPA would exceed the SCAQMD Regional Thresholds for VOCs, $NO_X$, CO, and $PM_{10}$ under long-term operational conditions, the NPA would result in a cumulatively-considerable net increase of criteria pollutants for which the Project region is non-attainment. Impacts would be increased as compared to the Project's less-than-significant operational air quality impacts. Localized air quality impacts during construction would be similar under the proposed Project and NPA, and would be less than significant. For long-term operations, neither the Project nor the NPA would exceed the SCAQMD Localized Significance Thresholds (LSTs); thus, localized operational impacts would be less than significant under both the Project and NPA, although the level of impact would be increased under the NPA due to the increase in traffic. Neither the Project nor the NPA would result in significant impacts due to odors, and the level of impact would be similar.

### D. Biological Resources

Under the NPA, a total of 61.1 acres of the Project site would be preserved as natural open space, while a total of 61.42 acres would be preserved as natural open space under the proposed Project. Additionally, areas subject to physical impacts off site would be similar under the NPA and proposed Project. As such, and similar to the proposed Project, the NPA would result in similar significant but mitigable impacts due to a conflict with the MSHCP; impacts to nesting birds and the burrowing owl; and impacts to 0.36-acre of Waters of the State under Regional Board jurisdiction, 0.44-acre of CDFW jurisdiction, and a total of 0.44-acre of MSHCP Riparian/Riverine areas. Impacts would be mitigated to below a level of significance, and the level of impact would be similar to the proposed Project. Neither the Project nor the NPA would result in

a conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and the level of impact would be similar.

### E. Cultural Resources

Areas proposed for physical impact under the NPA would be slightly increased by 0.32-acre as compared to the proposed Project, as the Project would preserve 61.42 acres of open space while the NPA would preserve 61.1 acres of open space in the northern portions of the Project site. Thus, the NPA would result in impacts to 134.9 acres on site, while the Project would result in impacts to 134.63 acres of the Project site. Both the Project and NPA would result in significant but mitigable impacts due to potential impacts to previously-undiscovered subsurface historical resources, and the level of impact would be similar. Additionally, because no archaeological resources are known to occur on site and because both the Project and NPA would be subject to the mitigation measures identified by this EIR to address potential impacts to historical resources, impacts to archaeological resources under both the Project and NPA would be less than significant and the level of impact would be similar. Likewise, with mandatory compliance with State law, both the Project and NPA would result in less-than-significant impacts to human remains, and the level of impact would be similar.

### 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, and the level of impact would be similar. Based on the rates utilized in Riverside County EIR No. 521[1], and due to the inclusion of commercial retail uses as part of the NPA, the NPA would generate a demand for electricity that is approximately 1.8 times the proposed Project's electricity demand, and also would generate a demand for natural gas that is approximately 2.5 times the proposed Project's anticipated demand for natural gas. Additionally, the NPA would generate approximately 20,317 ADT (as indicated in Table 3.15-3 of EIR No. 525 prepared in conjunction with the adopted SP 380), whereas the proposed Project would result in approximately 5,968 ADT. Thus, the Project would result in an approximately 70.6% reduction in demand for vehicular-related fuel under long-term operations. Thus, under long-term operations, the energy demands of the NPA would be greater than for the proposed Project. Although neither the Project nor the NPA would result in the wasteful, inefficient, or unnecessary consumption of energy resources and impacts would be less than significant, impacts due to energy consumption would be increased under the NPA as compared to the proposed Project. Both the Project and NPA would be required to comply with adopted State and local

[1] Riverside County General Plan EIR No. 521 Tables 5.5-O and 5.5-P indicate that residential uses generate a demand for electricity of 5,626 kilowatt-hours per year (kWh/yr) per dwelling unit and a natural gas demand of 79,980 cubic feet per year (cfy) per dwelling unit, and that commercial retail land uses generate a demand for electricity of 13.20 kWh/yr per s.f. of building area and a natural gas demand of 34.8 cfy per s.f. of building area. Thus, the adopted land uses for the site would generate an annual operational demand for 10,380,320 kWh/yr of electricity and 48,213,600 cubic feet per year (cfy) of natural gas. Refer to EIR Table 4.6-10 for the proposed Project's anticipated demands for electricity and natural gas.

plans related to energy conservation; thus, impacts would be less than significant and the level of impact would be similar.

### 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 Project site; thus, impacts associated with rupture of a known fault and strong seismic ground shaking would be less than significant and similar under the proposed Project and 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, collapse, or rockfall hazard would be similar and would be less than significant. Impacts associated with ground subsidence also would be similar under the Project and NPA. Neither the Project nor the NPA would be subject to geologic hazards, such as seiches, mudflow, or volcanic hazards; impacts would be less than significant and the level of impact would be similar. Grading activities would be similar under the Project and NPA; thus, impacts due to cut or fill slopes greater than 2:1 or higher than 10 feet would be similar and would be less than significant. 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 waste water 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

A majority of the Project's GHG emissions would result from vehicular emissions. As previously noted, the NPA would result in 20,317 ADT, whereas the proposed Project would result in approximately 5,968 ADT. Additionally, the NPA would generate a demand for electricity that is approximately 1.8 times the proposed Project's electricity demand, and also would generate a demand for natural gas that is approximately 2.5 times the proposed Project's anticipated demand for natural gas. Additionally, the Project would result in a reduction in long-term operational traffic by approximately 70.6% compared to the land uses accommodated by the adopted SP 380. As such, it can be concluded that total GHG emissions and associated impacts under the NPA would be increased 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, although the NPA would accommodate 400,000 s.f. of commercial retail building area and 374 fewer residential dwelling 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. 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 similar. The Project site is not located within an Airport Master Plan, is not located within two miles of a public airport or public use airport, and development on site would not require review by the Airport Land Use Commission; thus, impacts due to airport-related hazards would be less than significant under both the Project and the NPA, and the level of impact would be similar. The Project site is not located in the Airport Influence Area (AIA) of any private airports; thus, there would be no impacts due to private airport-related hazards 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 an 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. Due to the relatively flat nature of the portions of the Project site proposed for development, 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 General Plan Amendment (GPA), both the Project and the NPA would be fully consistent with the Riverside County General Plan and SWAP. Thus, impacts due to a conflict

with the General Plan would be less than significant under both the Project and the NPA, and the level of impact would be similar. Both the Project and NPA also would be consistent with SCAG's 2024-2050 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 site is located outside of areas subject to public and private airport-related noise levels exceeding 55 dBA CNEL; thus, impacts due to airport-related noise would be less than significant under both the Project and the NPA. Construction-related noise under the Project and NPA would be similar and impacts due to construction noise would be reduced to below a level of significance under both the Project and NPA with the implementation of mitigation. With respect to transportation-related noise, the NPA would generate more ADT than the proposed Project, and therefore would result in increased, and potentially unmitigable, impacts due to transportation-related noise, particularly along the segment of Keller Road between Leon Road and Winchester Road (SR-79). Construction-related vibration impacts would be similar under the Project and NPA; thus, impacts would be less than significant and would be similar to the proposed Project. Under long-term operations, neither the Project nor the NPA would involve a substantial number of heavy truck trips, and thus the Project and NPA would result in similar less-than-significant impacts due to operational vibration.

### N. Paleontological Resources

The Project site was determined to have a "High" paleontological sensitivity rating. Because areas of physical impact would be similar under the Project and NPA, both the Project and NPA would result in significant but mitigable 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 NPA. Although the type of development 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. Additionally, neither the Project nor

the NPA would indirectly induce growth, as infrastructure improvements would be sized to accommodate only future development on site. Impacts to population and housing would be less than significant under both the Project and NPA, and the level of impact would be similar.

### P. Public Services

The NPA would result in a slightly increased level of development intensity on site as the proposed Project. As such, impacts to fire services, sheriff services, and health services would be slightly increased but would be less than significant with payment of mandatory Development Impact Fees (DIF) in accordance with Riverside County Ordinance No. 659. The Project would involve the construction of up to 694 dwelling units, whereas the NPA would involve the construction of up to 320 dwelling units; thus, impacts to library facilities would be reduced under the NPA as compared to the Project, although impacts would be less than significant under both the Project and NPA with payment of DIF fees. Additionally, although the NPA would involve a total of 320 dwelling units, up to 225 of the dwelling units under the NPA would be age qualified and would not generate a student population. As such, impacts to school services would be reduced under the NPA as compared to the Project, although impacts would be reduced to less-than-significant levels under the Project and NPA with mandatory payment of school impact fees pursuant to Senate Bill 50 (SB 50). As the overall level of development intensity would be similar under the NPA and proposed Project, impacts to health services would be similar and would be less than significant with payment of DIF fees.

### Q. Recreation

The NPA would result in fewer residential dwelling units than the proposed Project. While the Project would allow for up to 694 dwelling units and generate an estimated 2,115 residents, the NPA would allow for up to 320 dwelling units, generating approximately 1,014 residents. As discussed in EIR Section 4.17, the Project would generate a parkland demand of approximately 11.07 acres and would accommodate 8.88 acres of on-site parkland, resulting in a shortfall of 2.19 acres that would be addressed through payment of Quimby Act in-lieu fees in accordance with Riverside County Ordinance No. 460 and the VWRPD Master Plan. In contrast, the NPA would generate a parkland demand of approximately 5.07 acres based on applicable persons-per-household rates (see EIR Table 4.17-1), but no on-site recreational parkland would be provided. Therefore, although the Project would generate greater demand for recreational facilities, it would also provide substantially more on-site parkland, and any shortfall would be mitigated through mandatory fee payment. By comparison, the NPA would result in greater reliance on existing off-site parkland resources. As such, impacts related to parkland demand and potential physical deterioration of recreational facilities would be greater under the NPA than under the proposed Project. Both scenarios would involve development of recreational amenities (e.g., trails), and associated construction impacts would be similar and short-term in nature.

### R. Transportation

The County's VMT significance methodology is based on a VMT efficiency metric (VMT per capita), not total daily vehicle trips. As a result, a difference in total daily trips between the Project and the No Project (Adopted Specific Plan) Alternative (NPA) does not, by itself, demonstrate a meaningful difference in VMT impact significance. Under the County's approach, an alternative can generate fewer daily trips but still have

a similar (or even higher) VMT per capita outcome if the reduction in trips is generally proportional to a reduction in capita (residents), and/or if average trip lengths are comparable between scenarios.

VMT per capita values under the NPA would be similar to the proposed Project because the NPA's higher total daily trips are paired with a higher population, and both scenarios reflect similar regional travel patterns and trip lengths associated with the same geographic area and circulation context. Therefore, even though the Project would generate fewer total trips than the NPA, the VMT per capita values (the County's significance metric) would remain similar, and both scenarios would exceed the County's applicable VMT per capita threshold by a similar margin. Accordingly, both the Project and NPA would result in significant and unavoidable VMT impacts, consistent with the discussion in Section 6.4.2 (pp. 6-19 to 6-20). Both the Project and the NPA would be required to comply with all applicable provisions of the County's General Plan, Southwest Area Plan (SWAP), 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. 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. 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

Grading activities under the Project and NPA would be similar and would have the potential to result in impacts to previously undiscovered subsurface tribal cultural resources. As such, potential impacts to tribal cultural resources would be similar under the Project and the NPA, and impacts would be reduced to less-than-significant with implementation of mitigation measures requiring monitoring and avoidance of resources during construction activities.

### T. Utilities and Service Systems

The level of development intensity on site would be similar under both the Project and NPA. Both the Project and NPA would require the construction of water, wastewater, storm water 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 mitigation measures. The EMWD determined that it has sufficient water resources to accommodate development proposed as part of the Project, while the NPA is fully consistent with the growth assumptions used by EMWD for long-term planning efforts. Thus, because EMWD would be able to provide potable water to both the Project and the NPA, impacts to water supply would be less than significant and the level of impact would be similar. Similarly, EMWD would have adequate capacity to treat wastewater generated by either the Project or the

NPA; thus, impacts due to wastewater would be less than significant under both the Project and NPA, and the level of impact would be similar. Both the Project and NPA would be subject to the County's solid waste regulations, and neither the Project nor the NPA would result in the generation of solid waste that could adversely affect landfill capacity. Impacts associated with solid waste would be less than significant, and the level of impact would be similar under both the Project and NPA.

### U. Wildfire

Both the Project and NPA would involve development of urban uses adjacent to lands that are identified as having a high risk for wildfire hazards. Both the Project and NPA would be required to implement a Fire Protection Plan (FPP) to ensure that adequate provisions are accommodated, such as fuel management zones, to reduce the risk of wildfires. With implementation of mitigation and a FPP, impacts due to wildfires would be reduced to less-than-significant levels and the level of impact would be similar.

### V. Conclusion

As compared to the proposed Project, the NPA would have increased impacts under the issue areas of air quality, energy, greenhouse gas emissions, noise, and recreation. The NPA would result in the same or similar impacts under the issue areas of aesthetics, agriculture/forest resources, biological resources, cultural resources, geology/soils, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, paleontological resources, population/housing, public services (except for schools and libraries), transportation, tribal cultural resources, utilities/service systems, and wildfire. The NPA would result in reduced impacts as compared to the Project under the issue area of public services (schools and libraries).

The NPA would meet most of the Project's objectives. The NPA largely would meet the Project's objective to efficiently develop an underutilized property with a complementary mix of land uses, including residential, recreational, and open space land uses, although the NPA also would accommodate commercial retail land uses. The NPA also would meet the Project's objective to establish a master-planned community in a manner that is sensitive to the environment as well as visually and functionally compatible with surrounding existing and proposed land uses. Additionally, the NPA would meet the Project's objective to develop a master-planned community with a design that takes topographic, geologic, hydrologic, and environmental opportunities and constraints into consideration. Due to the reduction in the number of dwelling units under the NPA, the NPA would be less effective than the proposed Project in increasing the available housing supply within the region by providing detached single-family homes and age-qualified multi-family homes that will be marketable within the evolving economic profile of Riverside County and surrounding communities. The NPA would meet the Project's objective 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. The NPA also would meet the Project's objective to require project design elements such as architecture, landscaping, color, paving, walls, fencing, signage, entry treatments, and other similar design features that would ensure the community is developed in a manner that is aesthetically pleasing. Finally, the NPA would meet the Project's objective to establish development phasing that results in logical coordinated growth.

### 6.4.3 Reduced Project Alternative (RPA)

The Reduced Project Alternative (RPA) was selected to evaluate a development scenario that is less intensive than the proposed Project and that could avoid the Project's significant and unavoidable Vehicle Miles Traveled (VMT) impact. Based on the Riverside County 2020 *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled* (herein, "County Guidelines), single-family residential developments with 110 or fewer dwelling units and multi-family residential developments (low rise) with fewer than 147 dwelling units are presumed to have a less-than-significant impact due to VMT, as development of 110 single-family dwelling units or 147 multi-family (low rise) dwelling units would result in the emissions of Greenhouse Gases (GHGs) that would be at or below 3,000 Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$) per year, and such developments are presumed to have a less-than-significant impact due to VMT. Accordingly, the RPA considers development of the Project site with up to 110 single-family dwelling units within the 87.37 acres of the Project site that are proposed for residential uses as part of the proposed Project. Under the RPA, residential dwelling units on site would have an average lot size of approximately 34,638 s.f. (0.8-acre). All other components of the RPA would be similar to the proposed Project, and would include a 8.88-acre park site, 3.49 acres of Open Space – Conservation (OS-C), 61.42 acres of Open Space – Conservation Habitat (OS-CH), 16.00 acres of Open Space – Water (OS-W), and approximately 18.89 acres of public backbone roadways. The purpose of the RPA is to reduce total daily vehicle trips, VMT per capita, and associated air quality and greenhouse gas emissions, while still achieving at least some of the Project's core objectives. The RPA would retain the overall Specific Plan structure and development pattern of the proposed Project, but at a substantially reduced residential density.

#### A. Aesthetics

The Project site is not located within the viewshed of any officially designated or eligible State or County scenic highways or State-Eligible scenic highways. Thus, no impacts to scenic corridors would occur under the Project or RPA, and the level of impact would be similar. As with the proposed Project, the RPA would not substantially damage scenic resources; obstruct any prominent scenic vista or view open to the public; result in the creation of an aesthetically offensive site open to public view; or conflict with applicable zoning and other regulations governing scenic quality. Mandatory compliance with the proposed SP 380 also would ensure that the Project and RPA do not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and both the Project and the RPA would be required to comply with all applicable zoning and other regulations governing scenic quality. Impacts would be less than significant, and the level of impact would be similar. Both the Project and RPA would be subject to compliance with Riverside County Ordinance Nos. 348, 655, and 915, as well as the development standards and design guidelines of the approved or proposed SP 380, which would ensure that light and glare impacts would be less than significant under both the Project and the RPA, although the reduced level of lighting anticipated on site under the RPA would result in reduced impacts due to lighting in comparison to the PRoject.

#### B. Agriculture and Forestry Resources

Areas proposed for physical impact under the RPA would be similar to the proposed Project. Neither the Project nor the RPA would result in impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide

Importance; thus, no impact would occur under either the Project or the RPA, and the level of impact would be similar. Neither the Project nor the RPA would result in a conflict with existing agricultural zoning or land subject to a Williamson Act or Riverside County Agricultural Preserve, and impacts would be less than significant and similar. Both the Project and RPA would entail development of urban land uses within 150 feet of agriculturally-zoned property; however, both the Project and the RPA would be subject to compliance with Riverside County Ordinance No. 625. Mandatory compliance with Ordinance No. 625 would ensure that indirect impacts to agricultural lands are less than significant, and impacts would be the same under the Project and RPA. There are no other components of the Project or RPA that could result in the conversion of Farmland to non-agricultural use; thus, impacts would be less than significant and the level of impact would be similar. Neither the Project nor the RPA would result in impacts due to the conversion of forest land to non-forest uses, and the level of impact would be the same.

### C. Air Quality

A majority of the air quality emissions associated with both the proposed Project and the Reduced Project Alternative (RPA) would result from vehicular traffic. Because the RPA would reduce the total number of residential dwelling units by approximately 84 percent, it would generate substantially less vehicle traffic than the proposed Project. As such, operational air quality emissions under the RPA would be substantially reduced in comparison to the proposed Project, although neither the Project nor the RPA would result in operational emissions exceeding the SCAQMD Regional thresholds of significance. As with the Project, the RPA would not conflict with the applicable Air Quality Management Plan, although both the proposed Project and the RPA would require mitigation measures for construction-related emissions to ensure such emissions remain below the SCAQMD Regional thresholds of significance. Construction-related emissions under the RPA would be similar to those of the Project and would also remain below SCAQMD thresholds following the implementation of mitigation measures. Likewise, localized emissions during both construction and long-term operation would not exceed the applicable Localized Significance Thresholds (LSTs) and would therefore be less than significant under both the Project and RPA. Because the RPA would involve a substantial decrease in the intensity of development on site, it would result in further reductions in operational and mobile source emissions. Odor impacts would also remain less than significant and would be similar for both scenarios.

### D. Biological Resources

Under the RPA, and consistent with the proposed Project, a total of 61.4 acres of the Project site would be preserved as natural open space. Additionally, areas subject to physical impacts on and off site would be similar under the RPA and proposed Project. As such, and similar to the proposed Project, the RPA would result in significant but mitigable impacts due to a conflict with the MSHCP; impacts to nesting birds and the burrowing owl; and impacts to 0.36-acre of Waters of the State under Regional Board jurisdiction, 0.44-acre of CDFW jurisdiction, and a total of 0.44-acre of MSHCP Riparian/Riverine areas. Impacts would be mitigated to below a level of significance, and the level of impact would be similar to the proposed Project. Neither the Project nor the RPA would result in a conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and the level of impact would be similar.

### E. Cultural Resources

Areas proposed for physical impact under the RPA would be similar to the proposed Project, as both the Project and the RPA would preserve 61.42 acres of open space in the northern portions of the Project site while resulting in full disturbance to the remaining portions of the Project site. Both the Project and RPA would result in significant but mitigable impacts due to potential impacts to previously-undiscovered subsurface historical resources, and the level of impact would be the same. Additionally, because no archaeological resources are known to occur on site and because both the Project and RPA would be subject to the mitigation measures identified by this EIR to address potential impacts to historical resources, impacts to archaeological resources under both the Project and RPA would be less than significant and the level of impact would be the same. Likewise, both the Project and RPA would result in significant but mitigable impacts to human remains, and the level of impact would be the same.

### F. Energy

Energy consumption during construction of both the proposed Project and the Reduced Project Alternative (RPA) would be similar and would not result in the wasteful, inefficient, or unnecessary use of energy resources. Therefore, construction-related energy impacts would be less than significant under both scenarios. Under long-term operations, the RPA would include approximately 84 percent fewer residential units than the proposed Project. As a result, the RPA would generate a lower overall demand for electricity and natural gas and would result in approximately 84 percent fewer vehicle trips. Consequently, operational energy consumption under the RPA would be reduced compared to the proposed Project. While both the Project and RPA would result in less-than-significant impacts related to energy consumption, the RPA would further reduce energy demand and associated impacts due to the reduced development intensity. Both alternatives would comply with applicable State and local energy conservation plans; thus, impacts would remain less than significant.

### G. Geology and Soils

Both the Project and RPA 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 Project site; thus, impacts associated with rupture of a known fault and strong seismic ground shaking would be less than significant and similar under the proposed Project and the RPA. Because development would occur over approximately the same area under the RPA 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, collapse, or rockfall hazard would be similar and would be less than significant. Impacts associated with ground subsidence also would be similar under the Project and RPA. Neither the Project nor the RPA would be subject to geologic hazards, such as seiches, mudflow, or volcanic hazards; impacts would be less than significant and the level of impact would be similar. Grading activities would be similar under the Project and RPA; thus, impacts due to cut or fill slopes greater than 2:1 or higher than 10 feet would be similar and would be less than significant. Neither the Project nor the RPA would result in grading that affects or negates subsurface sewage disposal systems, and neither the Project nor the RPA would require

septic tanks or alternative waste water disposal systems on unsuitable soils; thus, impacts would be less than significant and similar under the RPA and proposed Project. Similarly, impacts due to erosion hazards during construction and long-term operation would be similar under the RPA and proposed Project and impacts would be less than significant.

### H. Greenhouse Gas Emissions

Under the RPA, the number of dwelling units proposed on site would be reduced from 694 dwelling single-family and multi-family units under the proposed Project to 110 single-family dwelling units under the RPA. As noted by the County Guidelines for Transportation Analyses and Vehicle Miles Traveled, the development of 110 single-family dwelling units is anticipated to result in GHG emissions of approximately 3,000 $MTCO_2e$/year. By comparison, the proposed Project would generate operational emissions of approximately 9,771.91 $MTCO_2e$/year (excluding amortized construction emissions), as shown in EIR Table 4.8-4. Thus, implementation of the RPA would result in an approximate 69.3% reduction in GHG emissions as compared to the proposed Project. Based on the Riverside County 2019 CAP Update, Projects that emit 3,000 $MTCO_2e$/year or less are considered to have a less-than-significant impact due to GHG emissions, and such projects are not subject to compliance with the CAP Update Screening Tables. Thus, while the Project would result in less-than-significant impacts due to GHG emissions with mitigation measures requiring compliance with the CAP Update and the CAP Update Screening Tables, no such mitigation would be required for the RPA. Accordingly, impacts due to GHG emissions would be substantially reduced under the RPA as compared to the Project. Neither the Project nor the RPA 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 RPA would be similar to the proposed Project, although with a substantial reduction in the number of residential dwelling units proposed on site. Neither the Project nor the RPA 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 RPA 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 RPA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts under the RPA and proposed Project would be less than significant and the level of impact would be similar. Neither the Project nor the RPA would 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 RPA, and the level of impact would be similar. The Project site is not located within an Airport Master Plan, is not located within two miles of a public airport or public use airport, and development on site would not require review by the Airport Land Use Commission; thus, impacts due to airport-related hazards would be less than

significant under both the Project and the RPA, and the level of impact would be similar. The Project site is not located in the Airport Influence Area (AIA) of any private airports; thus, there would be no impacts due to private airport-related hazards and the level of impact would be the same.

### J. Hydrology and Water Quality

Both the Project and the RPA 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 RPA 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. Due to the relatively flat nature of the portions of the Project site proposed for development, it is not expected that the Project or RPA 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 RPA 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 a GPA, both the Project and the RPA would be fully consistent with the Riverside County General Plan and SWAP. Thus, impacts due to a conflict with the General Plan would be less than significant under both the Project and the RPA, and the level of impact would be similar. Both the Project and RPA also would be consistent with SCAG's 2024-2050 RTP/SCS, and as such impacts due to a conflict would be similar and less than significant. Additionally, neither the Project nor the RPA 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 RPA, and the level of impact would be similar. Additionally, neither the Project nor the RPA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and the RPA 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 site is located outside of areas subject to public and private airport-related noise levels exceeding 55 dBA CNEL; thus, impacts due to airport-related noise would be less than significant under both the Project and the RPA. Construction-related noise under the Project and RPA would be similar, and impacts due to construction noise would be reduced to below a level of significance under both scenarios with implementation of mitigation. Because the RPA would involve fewer residential units than the proposed Project, the Project's less-than-significant noise impacts associated with long-term operations would be further reduced under the RPA. With respect to transportation-related noise, the RPA would generate approximately 84 percent less average daily traffic (ADT) than the proposed Project and therefore would avoid the Project's less-than-significant impact (after mitigation) due to transportation-related noise along the segment of Keller Road between Leon Road and Winchester Road (SR-79). Construction-related vibration impacts would be similar under the Project and RPA; thus, impacts would be less than significant and comparable under both scenarios. Under long-term operations, neither the Project nor the RPA would involve a substantial number of heavy truck trips; therefore, operational vibration impacts would be less than significant and the level of impact would be similar.

### N. Paleontological Resources

The Project site was determined to have a "High" paleontological sensitivity rating. Because areas of physical impact would be similar under the Project and RPA, both the Project and RPA would result in significant but mitigable 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 RPA 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 RPA. Although the type of development on site would vary between the Project and the RPA, neither the RPA 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. Additionally, neither the Project nor the RPA would indirectly induce growth, as infrastructure improvements would be sized to accommodate only future development on site. Impacts to population and housing would be less than significant under both the Project and RPA, and the level of impact would be similar.

### P. Public Services

The RPA would result in a reduced level of development intensity on site as the proposed Project. As such, impacts to fire services, sheriff services, and health services would be slightly reduced and less than significant with payment of mandatory DIF fees in accordance with Riverside County Ordinance No. 659. The Project would involve the construction of up to 694 dwelling units, whereas the RPA would involve the construction of up to 110 dwelling units; thus, impacts to recreational, school, and library facilities would be reduced under the RPA as compared to the Project, although impacts would be less than significant under both the Project and RPA with payment of DIF fees and payment of school impact fees pursuant to SB

50. As the overall level of development intensity would be reduced under the RPA, impacts to health services would be similar and would be reduced as compared to the Project and less than significant with payment of DIF fees.

### Q. Recreation

The RPA would result in a reduced level of development intensity on site as the proposed Project. The Project would involve the construction of up to 694 dwelling units and would generate approximately 2,115 future residents, whereas the RPA would involve the construction of up to 110 dwelling units and would generate approximately 349 future residents. Thus, the Project would result in a substantial increase in demand for recreational resources as compared to the RPA. However, based on the population generation factors as discussed in EIR Subsection 4.17, the Project would result in a parkland demand of 11.07 acres whereas only 8.88 acres of parkland would be accommodated onsite. The RPA would result in a demand for approximately 1.75 acres of parkland (based on the rates shown in EIR Table 4.17-1), while 8.88 acres of parkland would be accommodated by the RPA; thus, the RPA would not require the payment of any in-lieu fees for recreational facilities. Thus, impacts due to parkland demand and due to physical deterioration of recreational facilities would be decreased under the RPA as compared to the proposed Project, although impacts would be less than significant under both the Project and RPA assuming payment of in-lieu park fees as part of the proposed Project. No Both the Project and RPA 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.

### R. Transportation

Both the Project and the RPA would be required to comply with all applicable provisions of the County's General Plan, SWAP, and Riverside County ordinances. As such, neither the Project nor RPA 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 RPA would include only 110 single-family dwelling units on site, and pursuant to the County Guidelines, projects that include 110 single-family dwelling units or less are presumed to have a less-than-significant impact due to VMT. Accordingly, implementation of the RPA would avoid the Project's significant and unavoidable impacts due to VMT. Impacts due to hazardous geometric design features and incompatible uses would be less than significant under both the Project and the RPA, and the level of impact would be similar. Both the Project and the RPA would result in less-than-significant impacts due to the need for new or altered maintenance of roads. Both the Project and the RPA 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 RPA. Both the Project and RPA 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 RPA would result in similar less-than-significant impacts due to bicycle facilities.

### S. Tribal Cultural Resources

Grading activities under the Project and RPA would be similar and would have the potential to result in impacts to previously undiscovered subsurface tribal cultural resources. As such, potential impacts to tribal cultural resources would be similar under the Project and the RPA, and impacts would be reduced to less-than-significant with implementation of mitigation measures requiring monitoring and avoidance of resources during construction activities.

### T. Utilities and Service Systems

The level of development intensity on site would be substantially reduced under the RPA as compared to the Project. Both the Project and RPA would require the construction of water, wastewater, storm water 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 mitigation measures identified throughout this EIR. The EMWD determined that it has sufficient water resources to accommodate development proposed as part of the Project, while the RPA would result in a substantially reduced demand for water resources as compared to the Project. Thus, impacts to water supply would be less than significant, although the level of impact would be substantially reduced under the RPA as compared to the Project. Similarly, EMWD would have adequate capacity to treat wastewater generated by either the Project or the RPA; thus, impacts due to wastewater would be less than significant under both the Project and RPA, although the level of impact would be substantially reduced under the RPA as compared to the Project. Both the Project and RPA would be subject to the County's solid waste regulations, and neither the Project nor the RPA would result in the generation of solid waste that could adversely affect landfill capacity. Impacts associated with solid waste would be less than significant, and the level of impact would be reduced under the RPA as compared to the Project due to the reduction in the number of proposed dwelling units.

### U. Wildfire

Both the Project and RPA would involve development of urban uses in adjacent to lands that are identified as having a high risk for wildfire hazards. Both the Project and RPA would be required to implement a FPP to ensure that adequate provisions are accommodated, such as fuel management zones, to reduce the risk of wildfires. With implementation of mitigation and a FPP, impacts due to wildfires would be reduced to less-than-significant levels and the level of impact would be similar.

### V. Conclusion

As compared to the proposed Project, the RPA would avoid the Project's significant and unavoidable impacts due to VMT. Additionally, in comparison to the Project, the RPA would result in reduced impacts under the issue areas of air quality, energy, greenhouse gas emissions, noise, public services, recreation, and utilities/service systems. The RPA would result in similar impacts as the proposed Project under the issue areas of aesthetics, agriculture/forestry resources, biological resources, cultural resources, geology/soils, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources,

paleontological resources, population/housing, tribal cultural resources, and wildfire. The RPA would not result in an increase in any of the Project's impacts to the environment.

The RPA would meet most of the Project's objectives, although in some cases to a lesser extent. Due to the reduction in the number of dwelling units, the RPA would be less effective in meeting the Project's objective efficiently develop an underutilized property with a complementary mix of land uses, including residential, recreational, and open space land uses. The RPA would meet the Project's objective to establish a master-planned community in a manner that is sensitive to the environment as well as visually and functionally compatible with surrounding existing and proposed land uses. Additionally, the RPA would meet the Project's objective to develop a master-planned community with a design that takes topographic, geologic, hydrologic, and environmental opportunities and constraints into consideration. Due to the reduction in the number of dwelling units under the RPA, the RPA would be less effective than the proposed Project in increasing the available housing supply within the region. Both the RPA and proposed Project would meet the Project's objective 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. The RPA would meet the Project's objective to require project design elements such as architecture, landscaping, color, paving, walls, fencing, signage, entry treatments, and other similar design features that would ensure the community is developed in a manner that is aesthetically pleasing. Additionally, the RPA would meet the Project's objective to establish development phases that results in logical coordinated growth.

## 6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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 historically occurred on the property. Because the NDA would avoid most of the Project's impacts, it warrants consideration as the "environmentally superior alternative." However, pursuant to CEQA Guidelines § 15126.6(e)(2), if a no project alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, the Reduced Project Alternative (RPA), as discussed above in subsection 6.4.3, is identified as the Environmentally Superior Alternative pursuant to CEQA Guidelines § 15126.6.

## Table 6-1 Comparison of Alternatives and Project-related 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) | Reduced Project Alternative (RPA) |
| Aesthetics | Less than Significant | Reduced | Similar | Similar |
| Agriculture and Forestry Resources | Less than Significant | Reduced | Similar | Similar |
| Air Quality | Less than Significant | Reduced | Increased | Similar |
| Biological Resources | Less than Significant | Reduced | Similar | Similar |
| Cultural Resources | Less than Significant | Reduced | Similar | Similar |
| Energy | Less than Significant | Reduced | Increased | Reduced |
| Geology and Soils | Less than Significant | Reduced | Similar | Reduced |
| Greenhouse Gas Emissions | Less than Significant | Reduced | Increased | Reduced |
| Hazards and Hazardous Materials | Less than Significant | Reduced | Similar | Similar |
| Hydrology and Water Quality | Less than Significant | Most Issues: Reduced<br>Erosion/Siltation: Increased | Similar | Similar |
| Land Use and Planning | Less than Significant | Increased | Similar | Similar |
| Mineral Resources | Less than Significant | Similar | Similar | Similar |
| Noise | Less than Significant | Reduced | Increased | Reduced |
| Paleontological Resources | Less than Significant | Reduced | Similar | Similar |
| Population and Housing | Less than Significant | Reduced | Similar | Similar |
| Public Services | Less than Significant | Reduced | Police/Fire/Health: Similar<br>Schools/Libraries: Reduced | Reduced |
| Recreation | Less than Significant | Reduced | Increased | Reduced |
| Transportation | Significant and Unavoidable Direct and Cumulatively-Considerable Impacts | Reduced to Less-than-Significant Levels | Similar | Reduced to Less-than-Significant Levels |
| Tribal Cultural Resources | Less than Significant | Reduced | Similar | Similar |
| Utilities and Service Systems | Less than Significant | Reduced | Similar | 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 | Similar |
| **Objective A:** To efficiently develop an underutilized property with a complementary mix of land uses, including residential, recreational, and open space land uses. | | No | Yes | Yes, but less effectively |
| **Objective B:** To establish a master-planned community in a manner that is sensitive to the environment as well as visually and functionally compatible with surrounding existing and proposed land uses. | | 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) | Reduced Project Alternative (RPA) |
| **Objective C:** To develop a master-planned 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 and age-qualified multi-family homes that will be marketable within the evolving economic profile of Riverside County and surrounding communities. | | No | Yes, but less effectively | Yes, but less effectively |
| **Objective E:** 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 | Yes |
| **Objective F:** To require project design elements such as architecture, landscaping, color, paving, walls, fencing, signage, entry treatments, and other similar design features that would ensure the community is developed in a manner that is aesthetically pleasing. | | No | Yes | Yes |
| **Objective G:** To establish development phasing that results in logical coordinated growth. | | No | Yes | Yes |

# 7.0 REFERENCES

## 7.1 PERSONS CONTRIBUTING TO EIR PREPARATION

### 7.1.1 Riverside County Planning Department (Lead Agency)

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### 7.1.2 T&B Planning, Inc.

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Mel Johnson

## 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 A1: 2021 Notice of Preparation (NOP) and Written Comments on the NOP

Appendix B2: 2025 NOP and Written Comments on the NOP

Appendix B1: Urban Crossroads, Inc., 2026. *Keller Crossing Air Quality Impact Analysis*. January 27, 2026.

Appendix B2: Urban Crossroads, Inc., 2025a. *Keller Crossing Specific Plan Construction Health Risk Assessment*. April 3, 2025.

Appendix C1: Glenn Lukos Associates, Inc., 2025. *Biological Technical Report for Keller Crossing Residential Development Project and Off Site Improvements*. September 2025.

Appendix C2: Glenn Lukos Associates, Inc., 2024. *Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis for Impacts to MSHCP Riparian/Riverine Areas, Keller Crossing Residential Development Project and Off Site Improvements*. June 2024.

Appendix C3: Glenn Lukos Associates, Inc., 2026. *Biological Technical Report Addendum for Keller Crossing Residential Development Project And Offsite Improvements*. March 19, 2026. Included as EIR *Technical Appendix C3*.

Appendix D1: Brian F. Smith and Associates, 2021. *A Phase I Cultural Resources Assessment for the Renaissance Ranch Project*. November 3, 2021.

Appendix D2: Brian F. Smith and Associates, 2024. *Cultural Resources Update Assessment for the Keller Crossing Project (SP 380; GA 951), Riverside County, California*. August 14, 2024.

Appendix E: Urban Crossroads, Inc., 2025b. *Keller Crossing Specific Plan Energy Analysis*. April 3, 2025.

Appendix F1: GeoTek, Inc., 2021. *Updated Geotechnical and Infiltration Evaluation, Proposed Single-Family Residential Development, Keller Crossing Project, Northwest Corner of Winchester Road and Keller Road, Winchester Area of Riverside County, California*. May 25, 2021.

Appendix F2: Geosoils, Inc., 2009. *Preliminary Geotechnical Investigation in Support of Environmental Impact Report and Specific Plan Submittal, Keller Crossings, Northwest Corner of Winchester and Keller Roads, Riverside County, California*. July 29, 2009.

Appendix F3: GeoTek, Inc., 2024. *Supplemental Rock Hardness Evaluation*, Keller Crossing Project. August 1, 2024.

Appendix G: Urban Crossroads, Inc., 2025c. *Keller Crossing Specific Plan Greenhouse Gas Analysis*. April 3, 2025.

Appendix H1: Tetra Tech, Inc., 2020. *Phase I Environmental Site Assessment, Keller Crossing*. July 27, 2020.

Appendix H2: Tetra Tech, Inc., 2024. *Limited Phase II Investigation, Keller Crossing*. December 31, 2024.

Appendix I1: RTM Engineering Consultants, 2025. *Preliminary Drainage Study for Tentative Tract Map No. 38163 (Keller Crossing) at Winchester Road (HWY-79) in the County of Riverside*. March 2025.

Appendix I2: RTM Engineering Consultants, 2026. *Preliminary County Project Specific Water Quality Management Plan (WQMP)*. January 2026.

Appendix J: Urban Crossroads, Inc., 2025d. *Keller Crossing Specific Plan Noise Impact Analysis*. May 20, 2025.

Appendix K: Brian F. Smith and Associates, 2022. Paleontological Resource Impact Monitoring Program for the Keller Crossing Project. July 27, 2022.

Appendix L1: Urban Crossroads, Inc., 2025e. *Keller Crossing Specific Plan No. 380 Amendment No. 1 Vehicle Miles Travelled (VMT) Analysis*. April 3, 2025.

Appendix L2: Urban Crossroads, Inc., 2025f. *Keller Crossing TTM No. 38163 Traffic Analysis*. April 7, 2025.

Appendix L3: Urban Crossroads, Inc., 2025g. *Keller Crossing TTM No. 38163 Trip Generation Assessment*. June 12, 2025.

Appendix M1: Eastern Municipal Water District (EMWD), 2021d. *Water Supply Assessment Report, Keller Crossing (Specific Plan No. 380)*. December 15, 2021.

Appendix M2: Eastern Municipal Water District (EMWD), 2025b. *Keller Crossing Water Supply Assessment*. July 22, 2025.

Appendix N: Firewise 2000, LLC, 2026. *Preliminary Fire Protection Plan Keller Crossing - Tract 38163*. February 6, 2026.

Appendix O: Draft Keller Crossing Specific Plan No. 380, Amendment No. 1 (SP 380A1)

Appendix P: T&B Planning, Inc., 2026. *Keller Crossing General Plan Consistency Analysis*. July 27, 2026.

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