INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

MEAD VALLEY WELLNESS VILLAGE PROJECT

UNINCORPORATED RIVERSIDE COUNTY, CALIFORNIA

January 2024

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UNINCORPORATED RIVERSIDE COUNTY, CALIFORNIA

Submitted to:

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Project No. PMB2201

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LIST OF ABBREVIATIONS AND ACRONYMS

2020 UWMP	2020 Urban Water Management Plan
AAQS	ambient air quality standards
AB	Assembly Bill
ABAU	Adjusted Business As Usual
ADT	average daily traffic
AFY	acre-feet per year
Alquist-Priolo Act	Alquist-Priolo Earthquake Fault Zoning Act
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ASCE	American Society of Civil Engineers
ASHRAE	American Society of Heating, Refrigerating and Air-Conditioning Engineers
Basin	South Coast Air Basin
Basin Plan	Water Quality Control Plan
bgs	below ground surface
BHCIP	Behavioral Health Continuum Infrastructure Program
BLM	Bureau of Land Management
BMPs	Best Management Practices
BP	Business Park
BTU	British thermal units
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Occupational Safety and Health Administration
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalGEM	California Geologic Energy Management Division
CALGreen Code	California Green Building Standards Code
California Register	California Register of Historical Resources

CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAO	Cleanup and Abatement Orders
CAP	Climate Action Plan
CAP Update	2019 Climate Action Plan Update
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDL	Clandestine Drug Lab
CDO	Cease and Desist Orders
CEC	California Energy Commission
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CGP	Construction General Permit
CH_4	methane
CHMIRS	California Hazardous Material Incident Report System
CMU	concrete masonry unit
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	County of Riverside
CRECs	Controlled Recognized Environmental Conditions
CRMP	Cultural Resource Monitoring Plan
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibels
DBESP	Determination of Biologically Equivalent or Superior Preservation
DCV	Design Capture Volume

DDT	dichlorodiphenyltrichloroethane
DEH	County of Riverside Department of Environmental Health
DEH	Department of Environmental Health
DHCS	Department of Healthcare Services
DOAS	dedicated outdoor air units
DOC	California Department of Conservation
DOT	United States Department of Transportation
DPM	diesel exhaust particulate matter
DPR	Department of Parks and Recreation
DTSC	California Department of Toxic Substances Control
du/ac	dwelling units per acre
DWR	California Department of Water Resources
EIA	United States Energy Information Administration
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMFAC2021	California Emissions Factor Model, Version 2021
EMS	Emergency Medical Services
EMWD	Eastern Municipal Water District
EO	Executive Order
EOP	Emergency Operations Plan
EPA	United States Environmental Protection Agency
EPD	Environmental Product Declaration
ERRP	Enhanced Recharge and Recovery Program
ESA	Environmental Site Assessment
EV	electric vehicle
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FHWA-RD-77-108	FHWA Highway Traffic Noise Prediction Model
FIRM	Flood Insurance Rate Map

FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
FTE	full-time equivalent
GHG	greenhouse gas
GMZ	Groundwater Management Zone
gpd	gallons per day
gpy	gallons per year
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GWh	gigawatt-hours
GWP	global warming potential
Handbook	*Design Handbook for Low Impact Development Best Management Practices*
HCP	Habitat Conservation Plan
HDM	Highway Design Manual
HFCs	hydrofluorocarbons
HHSS	Historical Hazardous Substances Storage
HPD	Health Product Declaration
HRECs	Historical Recognized Environmental Conditions
HVAC	heating, ventilation, and air conditioning
I-15	Interstate 15
I-215	Interstate 215
in/sec	inches per second
IS/MND	Initial Study/Mitigated Negative Declaration
kBTU	thousand British thermal units
kW	kilowatt
kWh	kilowatt-hours
lbs/day	pounds per day
L_{dn}	day-night average noise level
LEED-NC	Leadership in Energy and Environmental Design for New Construction
L_{eq}	equivalent continuous sound level

LID	Low Impact Development
LOS	level of service
LRA	Local Responsibility Area
LSTs	localized significance thresholds
Ma	million years ago
March ARB/IP	March Air Reserve Base/Inland Port
MAWA	maximum applied water allowance
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MLD	Most Likely Descendant
MM	Mitigation Measure
mpg	miles per gallon
mph	miles per hour
MRZ	Mineral Resource Zone
MS4 Permit	Municipal Separate Storm Sewer System Permit
M-SC	Manufacturing-Service Commercial
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
MT	metric tons
MT CO_2e	metric tons of carbon dioxide equivalent
MT CO_2e/yr	metric tons of carbon dioxide equivalent per year
MWD	Metropolitan Water District of Southern California
MWELO	Model Water Efficient Landscape Ordinance
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NALMA	North American Land Mammal Ages
National Register	National Register of Historic Places
NFPA	National Fire Protection Association
NHM	Natural History Museum of Los Angeles County
NO_2	nitrogen dioxide
NOI	Notice of Intent

NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
OES	Office of Emergency Services
OS	Open Space
OS-MIN	Open Space-Mineral Resources
P3	public-private partnership
Partner	Partner Engineering and Science, Inc.
Pb	lead
PCBs	polychlorinated biphenyls
PFCs	perfluorocarbons
PGA	peak ground acceleration
PM_{10}	particulate matter less than 10 microns in size
$PM_{2.5}$	particulate matter less than 2.5 microns in size
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PRDs	Permit Registration Documents
PRIMP	Paleontological Resources Impact Mitigation Program
RCBSD	Riverside County Building and Safety Department
RCDEH	Riverside County Department of Environmental Health
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCLS	Riverside County Library System
RCM	Regulatory Compliance Measure
RCP Guidelines	Regional Comprehensive Plan Guidelines
RCRA	Resource Conservation and Recovery
RECs	Recognized Environmental Conditions
RIVCOM	Riverside County Transportation Model

Riverside Transportation Analysis Guidelines	*Riverside County Transportation Analysis Guidelines for Levels of Service and Vehicle Miles Traveled*
RTP/SCS	Regional Transportation Plan and Sustainable Communities Strategy
RUHS	Riverside University Health System
RWQCB	Regional Water Quality Control Board
SARWQCB	Santa Ana Regional Water Quality Control Board
SB	Senate Bill
SC	Standard Condition
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SEAOC	Structural Engineers Association of California
SF_6	sulfur hexafluoride
SFP	School Facilities Program
SGMA	Sustainable Groundwater Management Act
SKR	Stephens' kangaroo rat
SKR HCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SMARA	Surface Mining and Reclamation Act of 1975
SMARTs	Stormwater Multiple Application and Report Tracking System
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SO_X	sulfur oxides
SPL	sound power level
SP No. 100	"A" Street Specific Plan
SR-74	State Route 74
SRA	Source Receptor Area, or State Responsibility Area
SRA 24	Perris Valley SRA
SRIs	solar reflectance indices
SUD	substance use disorder
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan

SWRCB	State Water Resources Control Board
TACs	toxic air contaminants
TMDLs	Total Maximum Daily Loads
USC	United States Code
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
VdB	vibration velocity decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOCs	volatile organic compounds
VRF	variable refrigerant flow
VVUSD	Val Verde Unified School District
WDID	Waste Discharge Identification Number
WEA	Wireless Emergency Alerts
Wellness Village	Riverside University Health System Wellness Village
Working Group	GHG CEQA Significance Threshold Working Group
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments
ZEV	zero emission vehicle

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1.0 PROJECT INFORMATION

1. **Project Title:**
   Riverside University Health System (RUHS) Mead Valley Wellness Village Project

2. **Lead Agency Name and Address:**
   Riverside County Facilities Management
   3403 Tenth Street, Suite 400
   Riverside, CA 92501

3. **Contact Person and Phone Number:**
   Mike Sullivan, Senior Environmental Planner
   (951) 955-8009

4. **Project Location:**
   Riverside County, CA

5. **Project Sponsor's Name and Address:**
   PMB, LLC
   3394 Carmel Mountain Road, Suite 200
   San Diego, CA 92121

6. **General Plan Designation:**
   Business Park (BP)

7. **Zoning:**
   Manufacturing-Service Commercial (M-SC)

8. **Description of Property:**
   Please refer to Section 2.2 (Project Description).

9. **Setting and Surrounding Land Uses:**
   Please refer to Section 2.1 (Setting and Surrounding Land Use).

10. **Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):**
    Please refer to Section 2.4 (Required Permits and Approvals).

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.??**
    Please refer to Section 4.18 (Tribal Cultural Resources).

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2.0 PROJECT DESCRIPTION

The proposed project would be constructed on land owned by the County of Riverside (County) in an unincorporated area of Riverside County, just west of the City of Perris (Assessor's Parcel Number [APN] 317-260-034-0). The project site is located approximately 0.3 mile west of Interstate 215 (I-215). The project site is bounded by Placentia Avenue to the north, Harvill Avenue to the east, Water Street to the south, and a small residential parcel and vacant land to the west. Figure 2-1 (all figures are provided at the end of this chapter) depicts the project site's location and regional vicinity.

2.1 SETTING AND SURROUNDING LAND USE

The 19.41-acre project site is currently undeveloped; however, the project site contains several mature trees. Commercial/industrial uses and vacant land are located to the north and east of the project site, across Placentia Avenue and Harvill Avenue, respectively. Low-density residential uses and vacant land are located to the south and west of the project site across Water Street and Tobacco Road, respectively. The project site is located within the boundaries of the Mead Valley Area Plan of the Riverside County General Plan. The Mead Valley Area Plan is surrounded by the city of Perris and the nearby cities of Lake Elsinore, Canyon Lake, Riverside, and Moreno Valley. The purpose of the Mead Valley Area Plan is to guide the evolving physical development and land uses in the unincorporated area west of Perris. The project site is owned by the County, which obtained the property on September 30, 2011.

According to the County's Zoning Map and General Plan, the project site is currently zoned as Manufacturing-Service Commercial (M-SC) in the North Perris Zoning Area and the designated land use is Business Park (BP). The M-SC zoning district is intended to provide for the development of industrial and manufacturing uses, including food, textile, lumber and wood, paper, chemicals, leather, stone, glass, concrete, and metal products, as well as machinery, electrical equipment, transportation and related industries, engineering instruments, mining, and kennels and catteries. The M-SC zoning district also allows for service and commercial uses (e.g., retail, office, health and exercise centers, vehicle repair shops, and laboratory use). Meat packing plants, cemeteries, distilleries, acid manufacturing, fertilizer production, airports, and solar power are conditionally permitted on the project site. The BP land use designation is intended for employee intensive uses, including research and development, technology centers, corporate office, clean industry, and supporting retail uses. The project site is also located within the "A" Street Specific Plan (SP No. 100).

It should be noted that the development of the proposed project is not subject to restrictions set forth in applicable zoning and general plan regulations for the project site because the County owns the land and has plenary authority over entitlements and permitting for County-owned property. In addition, the County's land use authority is supported by the Behavioral Health Continuum Infrastructure Program (BHCIP) authorizing legislation (California Welfare & Institutions Code, § 5960, et seq.), which provides that a project funded by BHCIP grants shall be deemed consistent and in conformity with any applicable local plan, standard, or requirement, and allowed as a permitted use within the zone in which the structure is located, and shall not be subject to a conditional use permit, discretionary permit, or to any other discretionary reviews or approvals.

Table 2.A summarizes surrounding land uses, General Plan land use designations, and zoning designations. Figure 2-2 depicts the project site's existing setting and surrounding land uses.

Table 2.A: On-Site and Adjacent Land Uses

Direction	Existing Land Use	General Plan Land Use Designation	Zoning Designation
Project Site	Undeveloped	Business Park (BP)	Manufacturing-Service Commercial (M-SC)
North	Commercial/Industrial	Business Park (BP)	Manufacturing-Service Commercial (M-SC)
East	Undeveloped and Industrial	Light Industrial	Manufacturing, Heavy (M-H)
South	Undeveloped and Commercial/Industrial	Business Park (BP)	Manufacturing-Service Commercial (M-SC)
West	Undeveloped and Single-Family Residential	Business Park (BP); Rural Community – Very Low Density Residential (RC-VLDR)	Industrial Park (I-P); Rural Residential – One-Family Dwelling (R-R-1)

Source 1: *Mead Valley Area Plan,* County of Riverside General Plan (County of Riverside 2021).
Source 2: *Riverside County, Map My County* (County of Riverside n.d.).

2.2 PROJECT DESCRIPTION

The proposed project would develop the project site, which is owned by the County of Riverside, with the Riverside University Health System (RUHS) Wellness Village (Wellness Village), consisting of five buildings, 633 surface parking spaces, landscaping, and walkways set in a campus setting. The Wellness Village provides for an entire continuum of behavioral health and wellness care, from urgent mental health treatment to supportive housing, including outpatient care, education, and social services. Services provided would also include mental health residential services for children and adults and substance use disorder residential services for adults. In addition to the Wellness Village, the proposed project includes potential buildout of a conceptual future building that would include up to 20,000 square feet of administrative/office uses on the project site independent from the RUHS Wellness Village. Construction of the future building is not being contemplated at this time, but the County anticipates the future building will be processed in the near future within Riverside County; therefore, its development is reasonably foreseeable and evaluated in this Initial Study/Mitigated Negative Declaration (IS/MND) at the project level, to the extent feasible. Figure 2-3 depicts the conceptual site plan. The proposed project includes a Schedule J Tentative Map that proposes to subdivide the site into six lots to facilitate the financing of separate components of the proposed project.

The proposed project will deliver a full-service behavioral health and physical health care campus that serves as a safe, monitored, and therapeutic community and living space while simultaneously delivering high-quality, person-first treatment. This Wellness Village project is the first of its kind and will host a multitude of other wrap-around and community services on site, including a primary care health clinic, a pet hotel, and a small convenience market. The project's vision is to enable consumers and their families to move through the campus' continuum of care from intensive oversight and treatment activities to decreased therapeutic contact, enabling consumers to prepare for a self-sustained recovery grounded in their community. The County believes the Wellness Village can become a State and national model of hope, reintegration, recovery, and compassion.

By delivering the right level of care and expanding service levels, the Wellness Village can save the County millions of dollars annually and make a long-lasting impact on the community through complete health, balance, and societal reintegration. The proposed project is also anticipated to

create approximately 600 permanent professional jobs, and over 1,500 construction jobs. The Wellness Village is also expected to generate over $600 million of economic growth, including an estimated $388.6 million in the Mead Valley area.

Pursuant to Board authorization, the BHCIP grant funding imposes stringent project delivery deadlines. The County also issued Requests for Proposals in February 2022 seeking qualified developers to assist in the construction, development, operation, and financing of the Wellness Village projects. PMB LLC was selected as the developer for this site to pursue accelerated project delivery through a public-private partnership (P3).

2.2.1 RUHS Wellness Village

The proposed project would develop the project site with the RUHS Wellness Village to provide integrated behavioral health services to residents of Riverside County. The Wellness Village would consist of five buildings, associated living facilities for patients, 633 surface parking spaces, landscaping, and walkways set in a campus setting. The five buildings would range in size from one to four stories and would include the following:

1. An approximately 99,250-square-foot Community Wellness and Education Center building.

2. An approximately 40,854-square-foot Children and Youth Services building, which will include 24 beds associated with the children and youth services crisis residential program and 6 beds associated with the short-term residential therapeutic program, for a total of 30 beds.

3. An approximately 50,989-square-foot Urgent Care Services building, including 16 beds associated with the crisis residential program and 40 beds associated the substance use disorder residential program, for a total of 56 beds. This building would also include 12 “non-bed” spots associated with adult mental health urgent care services, 12 spots associated with the children’s mental health urgent care services, and 15 spots associated with the sobering center.

4. An approximately 192,495-square-foot Supportive Transitional Housing building for those receiving treatment, including 76 beds associated with the recovery residence and 220 beds associated with supportive housing, for a total of 296 beds.

5. An approximately 66,773-square-foot Extended Residential Care building for those receiving treatment, including 50 beds associated with mental health rehabilitation and 90 beds associated with adult residents, for a total of 140 beds.[1]

The five buildings would total approximately 450,361 square feet. Overall, the proposed project would develop the project site with approximately 522 beds. Of the 522 beds, 442 are expected to be used by those staying longer than 30 days.

The five public health buildings would include the programs and functions detailed below.

[1] The living facilities associated with the proposed project would only be available for individuals or families receiving services at the project site.

- **Community Wellness and Education Center:** This four-story, approximately 99,250-square-foot building would include outpatient mental health and medical clinic services, and campus and community support amenities. The Community Wellness and Education Center is anticipated to serve approximately 1,100 clients per day and would provide the following Outpatient Day Programs:

    - **Children's Outpatient Program:** This program would include group therapy rooms, family rooms, a parent-child interaction therapy lab, offices, and workstations to provide support services and resources.

    - **Behavioral Health Specialty Program:** This program would include group therapy rooms, family rooms, offices, and workstations used to provide support services and resources.

    - **Substance Abuse Prevention & Treatment Program:** This program would provide services designed to treat adults who meet the criteria for a substance use disorder and have the ability and stability to participate in low intensity, professionally directed treatment. Individuals would participate in treatment programs consisting of individual and group sessions based on an individualized treatment plan designed by the individual and their treatment team.

    - **Community Health Clinic:** This outpatient medical clinic would support primary care, internal medicine, and pediatric and dental services. Program functions include consult rooms, exam rooms, procedure rooms, dental operatories, and clinical teamwork areas.

- **Children and Youth Services:** This three-story, approximately 40,854-square-foot building would include a children's outpatient mental health program similar to the Outpatient Day Program provided through the Community Wellness and Education Center and described above, a children's crisis residential program, and a children's intensive mental health treatment program. Children and Youth Services is anticipated to serve approximately 128 clients and 30 temporary residents per day.

    - **Children's Crisis Residential Program:** This program includes a residential treatment facility that would provide crisis stabilization, medication monitoring, and evaluation. Services would include individual and group counseling, crisis intervention, skill development (including self-advocacy), family counseling, connection to community support and resources, socialization, refinement of interpersonal skills, medication support, and psychiatric nursing services. The unit would support up to 16 clients. The unit would include private rooms with support space for therapy, treatment, and daily living. The facility would also include housing and support for caregivers whose children are receiving treatment. Maximum length of stay would be approximately 14 days.

    - **Children's Intensive Mental Health Treatment Program:** This program includes a short-term residential therapeutic program that would provide trauma-informed, culturally relevant, age and developmentally appropriate services, including specialty mental health services, transition support services, educational, physical, behavioral, and mental health services (including extracurricular activities and social supports), and services to achieve

permanency. The unit would support up to three clients. The unit would include private rooms with support space for daily living. The average length of stay would be 6–9 months.

- **Urgent Care Services:** This two-story, approximately 50,989-square-foot building would include adult mental health urgent care, children's mental health urgent care, a sobering center, and short-stay treatment programs. The short-stay residential treatment programs would include a 16-bed crisis treatment unit and four units of 10 beds each (40 beds total) to support substance use treatment and withdrawal/detox. Urgent Care Services is anticipated to serve approximately 26 clients and 56 temporary residents per day. Urgent Care Services would provide the following Outpatient Urgent Care Programs and Short-Stay Treatment Programs:

    - **Adult Mental Health Urgent Care:** 24/7 services for adults with emergent behavioral health issues or disorders. Care would include mental health screening and assessment services and medications to address the needs of those in crisis in a safe, efficient, trauma-informed, and least-restrictive setting. Clients would be voluntarily admitted and stay a maximum of 24 hours.

    - **Children's Mental Health Urgent Care:** 24/7 services for children and adolescents (ages 5–18) with emergent behavioral health issues or disorders. Care would include mental health screening and assessment services and medications to address the needs of those in crisis in a safe, efficient, trauma-informed, and least-restrictive setting. Clients would be voluntarily admitted and stay a maximum of 24 hours.

    - **Sobering Center:** 24/7 services for individuals with mental illness and/or substance use disorders who are under the influence of alcohol or drugs. The facility would provide short-term monitoring and management of persons under the influence of alcohol and drugs as an alternative to jail and emergency services. The sobering center would offer a safe place for individuals to stay and referrals to a detox facility and support services. The average length of stay would be 12 hours.

    - **Crisis Residential Treatment:** Short-stay treatment unit that would provide services for adults in a mental health crisis. Services would include education, rehabilitation, medication counseling, and case management. The unit would support up to 16 clients. The unit would also include private rooms with support space for therapy, treatment, and daily living. The average length of stay would be 2 weeks.

    - **Substance Use Treatment:** Short-stay treatment unit that would provide services for adults in need of substance use treatment. Services would include education, rehabilitation, medication counseling, and case management. The unit would support up to 30 clients. The unit would include a mix of private and shared rooms with support space for therapy, treatment, and daily living. The average length of stay would be between 3.5 and 14 days.

    - **Withdrawal Management:** Short-stay treatment unit that would provide services for adults in need of substance use detox and not in need of medical withdrawal support. Services include education, counseling, and case management. The unit would support up to 10

clients. Unit includes individual rooms with support space for therapy, treatment, and daily living. The average length of stay would be between 3.2 and 7 days.

- **Supportive Transitional Housing:** This four-story, approximately 192,495-square-foot building includes supportive housing and recovery residences. The supportive housing includes 43 studio apartments, 42 two-bedroom apartments, and 31 three-bedroom apartments (including 11 family units) on the first, second, and third floors. The recovery residence is located on the fourth floor and includes 15 studio apartments, 14 two-bedroom apartments, and 11 three-bedroom apartments. Supportive Transitional Housing is anticipated to serve approximately 312 temporary residents per day.

    - **Short-Term Supportive Housing:** Supportive housing is intended to be provided to adults with serious mental illness, or children with severe emotional disorders and their families and persons who are receiving services in the Wellness Village and need housing.

      Supportive housing teams would assist residents in supportive housing to maintain stable housing through case management services, including regular home visits, life skills support, referral to community resources, and linkage to appropriate services. Housing and services are available for up to 18 months. The average length of stay would be 6 months.

    - **Recovery Residence:** The recovery residence would be a community-like setting for individuals with a substance use disorder or a co-occurring disorder. The recovery residence provides a safe, supportive, and alcohol/drug-free living environment. Housing supports clients who are reintegrating into society while attending an outpatient program. The average length of stay would be 90 days.

- **Extended Residential Care:** This two-story, approximately 66,773-square-foot building would include mental health rehabilitation and adult residential programs. The mental health rehabilitation program would be located on the second floor and include three units of 16/17 beds each (50 beds total) to support individuals with mental disorders who would have been placed in a State hospital or another mental health facility to develop skills to become self-sufficient and capable of increasing levels of independence and functioning. The adult residential program would be located on the first floor and includes two wings (a combination of single and double rooms) for a total of 90 beds. The Extended Residential Care facility is anticipated to serve approximately 140 residents per day.

    - **Mental Health Rehabilitation Center:** This facility would provide services to clients who are 18 years of age or older, are considered seriously and persistently mentally disabled, and for whom such a setting is the least restrictive alternative available to meet their needs. The Mental Health Rehabilitation Center would provide rehabilitation and activity programs aimed at improving the adaptive functioning of persons with mental disabilities to enable clients to move into a less restrictive environment while preventing regression to a lower level of functioning. These services would include psychiatric and psychological services, learning disability assessment and educational services, prevocational and vocational counseling, development of independent living skills, self-help and social skills, and community outreach to develop linkages with other support and service systems, including

family members. The unit would support up to 50 clients. The unit would include individual rooms with support space for therapy, treatment, and daily living. The average length of stay would be 6 to 12 months.

- **Adult Residential Facility:** This facility would provide services to clients who are 18 years of age or older and unable to live by themselves but do not require 24-hour nursing care. The adult residential facility would provide a room, meals, housekeeping, supervision, storage and distribution of medication, and personal care assistance with basic activities like hygiene, dressing, eating, bathing, and transferring. The facility would support up to 90 clients. The unit would include a mix of private and shared rooms with support space for therapy, treatment, and daily living. The average length of stay would be 415 days.

The project site would be developed with an internal walkway and a village green connecting the campus setting. The proposed project would also include a small market, a café, play areas, sports courts, outdoor seating areas, a pet hotel, and a 3,318-square-foot amphitheater to serve employees, visitors, patients, and temporary residents. The approximately 2,793-square-foot market is proposed as part of the project in the Community Wellness and Education Center building. The market would likely sell produce, grab-and-go meals, and other food and drink items. The market would be operated by a third party and is intended to primarily serve the occupants and visitors of the site, not the general public. Although the general public will not be denied access to the market, general public use of the market is expected to be negligible. Given the limited anticipated scope of this use, the market was analyzed as an amenity to the Community Wellness and Education Center building instead of as a separate, stand-alone use.

The proposed project would employ approximately 605 full-time equivalent (FTE) employees, 13 of which would be associated with Supportive Transitional Housing, 143 with Urgent Care Services, 121 with Extended Residential Care, 87 with Children and Youth Services, and 241 with the Community Wellness and Education Center.

2.2.1.1 Landscaping

As a result of regular discing, the vegetation on the project site consists of nonnative grassland. Two native California fan palm (*Washingtonia filifera*) trees were present within the project site. Additionally, several nonnative trees were observed within the project site (e.g., Peruvian pepper tree [*Schinus molle*], olive [*Olea europaea*], and Chinese elm [*Ulmus parvifolia*]). Dominant plant species include Russian thistle (*Salsola tragus*), common Mediterranean grass (*Schismus barbatus*), ripgut brome (*Bromus diandrus*), and London rocket (*Sisymbrium irio*). The existing trees are not designated as historic or landmark trees and would be removed with implementation of the project.

The proposed project would develop the site with four gardens, including a succulent garden, a butterfly/hummingbird garden, a meadow garden, and a shade/fern garden. An approximately 8-foot-tall concrete masonry unit (CMU) wall would be constructed along the western property line, and would include barrier trees and a 10-foot planter in order to add visual appeal. Overall, the proposed project would include approximately 11,958 square feet of off-site landscaped area and 180,599 square feet of on-site landscaping (approximately 21 percent of the project site). In addition, 62,023 square feet of the project site (at the location of the future 20,000-square-foot administrative/office building) would be irrigated and hydroseeded; however, this landscaped area

would be removed with development of the future building and associated parking. All landscaping would be drought tolerant. Figure 2-4 depicts the conceptual landscape plan.

2.2.1.2 Vehicle Access, Site Circulation, and Parking

Vehicle access to the project site would be provided via five driveways, including one from Placentia Avenue, two from Harvill Avenue, and two from Water Street. All driveways would be constructed to meet Riverside County Fire Department (RCFD) standards for emergency access. Figure 2-3 depicts the conceptual site plan, including the proposed driveways and internal circulation system.

The proposed project would provide 633 surface parking spaces for employees, visitors, patients, and temporary residents, 386 spaces of which would be associated with the Community Wellness and Education Center, 71 spaces with Children and Youth Services, 54 spaces with Urgent Care Services, 51 spaces with the Supportive Transition Housing, and 71 spaces with Extended Residential Care. Solar panel arrays would be provided atop canopies above the parking lots.

2.2.1.3 Earthwork

Site preparation would disturb approximately 20 acres, and grading activities would excavate and/or fill approximately 180 acres of material, resulting in approximately 6,000 cubic yards of cut material to export from the project site.

2.2.1.4 Utilities

The project would interconnect to existing utility connections located within the surrounding street rights-of-way, including Placentia Avenue and Water Street. Existing Eastern Municipal Water District (EMWD) sewer infrastructure in the surrounding area does not have the capacity to serve the proposed project. As such, the proposed project would include off-site improvements to existing EMWD sewer infrastructure. The existing 8-inch-diameter sewer lines in Placentia Avenue, Water Street, and along West Frontage Road between Placentia Avenue and Water Street would be replaced with 10-inch-diameter sewer lines and would connect to the existing 10-inch-diameter sewer line in West Frontage Road. The upgrades would occur predominantly within existing right-of-ways, with one segment within an EMWD beneficial easement on private property. These areas have been previously disturbed during construction of the existing pipelines and would not result in any new disturbance that may cause a significant environmental impact. Figure 2-5 depicts the on- and off-site utility improvements.

2.2.1.5 Sustainability Features

The proposed project would be designed to meet Leadership in Energy and Environmental Design for New Construction (LEED-NC) v4 Silver Standards. The currently vacant site would be redeveloped to incorporate significant plantings and tree cover, thereby increasing carbon sequestration on site. As previously discussed, plant selections will consist primarily of native and adapted species. Irrigation use will be reduced by over 50 percent for the site's peak watering month as calculated using the United States Environmental Protection Agency (EPA) WaterSense Water Budget Tool, and the landscaping will be metered separately so that water use can be easily tracked.

Alternative transportation would also be supported on site with the addition of a bus stop, as well as short-term and long-term bicycle accommodations. In addition, 5 percent of all parking spaces would be outfitted with electric vehicle (EV) charging stations, and an additional 15 percent of spaces would be EV ready.

The buildings would be designed to provide user comfort and enhanced indoor environmental quality while simultaneously maximizing energy efficiency. They will be served by variable refrigerant flow (VRF) mechanical systems and dedicated outdoor air units (DOAS). Spectrally selective low-e glazing has been selected to significantly reduce solar heat gain through the windows, while providing ample daylight and views to the occupants. Proposed roofing solar reflectance indices (SRIs) would exceed code requirements so that the roofs return the majority of solar energy to the atmosphere rather than allowing it to enter the structures. Plumbing fixtures would be selected to reduce restroom water use and water heating energy by implementing WaterSense labeled fixtures. Further, residential clothes washers and dishwashers will be EnergyStar certified.

Energy cost of the proposed project was modeled using American Society of Heating, Refrigerating and Air-Condtioning Engineers (ASHRAE) 90.1-2010 and indicated that the proposed project is anticipated to exceed ASHRAE 90.1-2010 standards. In addition, a 335- to 600-kilowatt (kW) solar photovoltaic array would be incorporated via carports, totaling approximately 20,000 square feet of coverage, that is anticipated to offset a minimum of 12 percent of the energy used by the buildings for an overall energy cost reduction of 38 percent below the ASHRAE 90.1-2010 energy standard. The proposed buildings and solar photovoltaic arrays would be commissioned to ensure that they meet the design intent, and exterior light fixtures will be chosen to minimize light pollution.

Interior materials such as paints, coatings, floorings, ceilings, and acoustical treatments would be selected to meet the California Department of Public Health requirements as well as SCAQMD VOC limits (where applicable). Many products would also hold Cradle-to-Cradle certifications for their holistic sustainability attributes, or have transparency documentation such as Declare labels, Environmental Product Declarations (EPDs), or Health Product Declarations (HPDs). Indoor air quality will be further supported by air handling units that employ MERV-8 prefilters and MERV-13 final filters to filter outdoor air being supplied to occupied spaces.

Further, a minimum of 65 percent of non-hazardous demolition and construction waste would be recycled or salvaged during construction, and 100 percent of trees, stumps, rocks, and associated vegetation would be collected for reuse.

2.2.2 Future Building

As previously discussed, while no formal application has been submitted at this time, this IS/MND evaluates the reasonably foreseeable future building, which includes the construction of a two-story, 20,000-square-foot administrative/office building in the northern portion of the project site adjacent to Placentia Avenue, and 120 additional surface parking spaces. It is proposed that this future building would be used entirely for administrative/office uses, independent from the Wellness Village.

2.2.3 Construction

Construction of the proposed project is anticipated to last approximately 31 months, beginning in January of 2024 and ending January 2026. Table 2.B outlines the proposed construction phasing and schedule.

Table 2.B: Construction Phasing and Schedule

Phase	Start Date	End Date	Duration
Site Preparation	June 3, 2024	July 5, 2024	26 days
Grading	July 8, 2024	August 29, 2024	39 days
Ground Improvement (Trenching)	March 10, 2024	May 24, 2024	14 days
Utility Trenching	July 2, 2024	November 8, 2024	92 days
Building Construction	September 20, 2024	December 31, 2026	27 months
Paving	May 5, 2025	June 2, 2025	20 days
Project	**June 3, 2024**	**December 31, 2026**	**31 months**

Source: Compiled by LSA based on communication with the project sponsor (2023).

2.3 METHODOLOGY

The analysis in this IS/MND provides an environmental review of the project pursuant to the California Environmental Quality Act (CEQA). The details of the proposed Wellness Village, future administrative building, and associated actions have been characterized in this section and are also addressed in detail throughout Chapter 4.0, CEQA Environmental Checklist, of this IS/MND. If the project were approved, the proposed Wellness Village and future administrative building would be allowed without further environmental review so long as the development complies with the County's regulations and project-specific mitigation measures and conditions of approval.

2.4 REQUIRED PERMITS AND APPROVALS

The County is expected to use this IS/MND in consideration of the proposed Wellness Village and associated actions. These actions may include, but are not limited to, the following:

- Plan Review and Issuance of Building Permits

The following approvals from Responsible Agencies may also be required:

- **State Water Resources Control Board (SWRCB):** Notice of Intent (NOI) to comply with the General Construction Activity National Pollutant Discharge Elimination System (NPDES) Permit.

- **Utility Providers:** Connection permits from the EMWD for water and sewer service, Southern California Edison (SCE) for electricity service, and Southern California Gas Company (SoCalGas) for natural gas service.

2.5 INITIAL STUDY APPENDICES/REFERENCE DOCUMENTS

This IS/MND is based on the following environmental documents and technical studies:

- Appendix A: California Emissions Estimator Model (CalEEMod)
- Appendix B: Western Riverside County MSHCP Conservation Plan Consistency Analysis and Biology Report
- Appendix C: Cultural Resources Assessment
- Appendix D-1: Geotechnical Investigation Report
- Appendix D-2: Paleontological Resources Assessment
- Appendix E: Riverside County Climate Action Plan (CAP) Screening Table
- Appendix F-1: Phase I Environmental Site Assessment
- Appendix F-2: UST Closure Guidelines
- Appendix G-1: Long-Term Noise Monitoring Survey Sheets
- Appendix G-2: Construction Equipment Calculations
- Appendix G-3: FHWA Roadway Noise Levels Analysis
- Appendix G-4: Operational Noise Impacts – SoundPLAN
- Appendix H: Transportation Analysis

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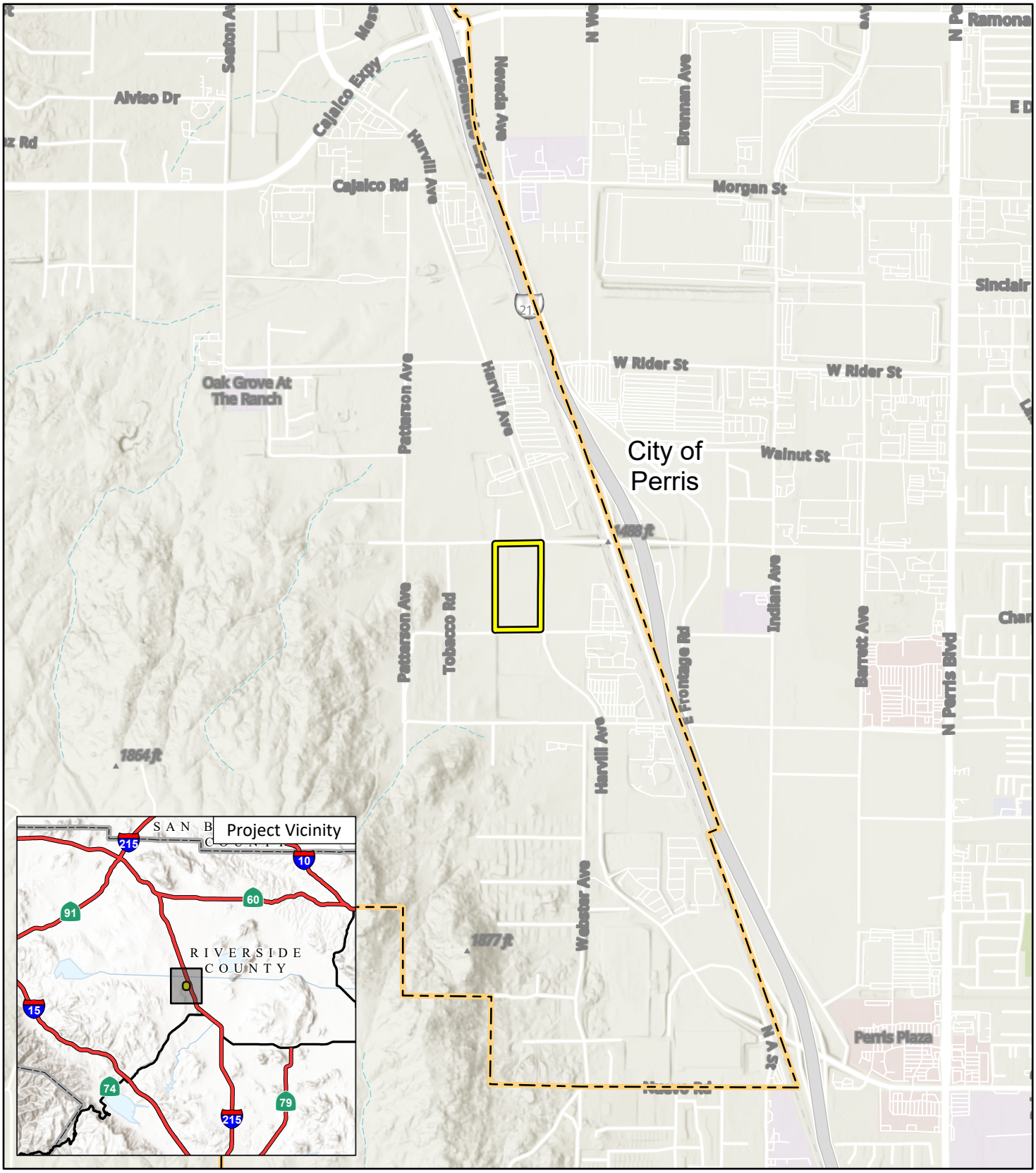

LSA

FIGURE 2-1

Mead Valley Wellness Village Project

Regional and Project Location

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LSA

LEGEND

Project Site

FIGURE 2-2

N

0 400 800

FEET

SOURCE: Google Earth

Mead Valley Wellness Village Project

Setting and Surrounding Land Uses

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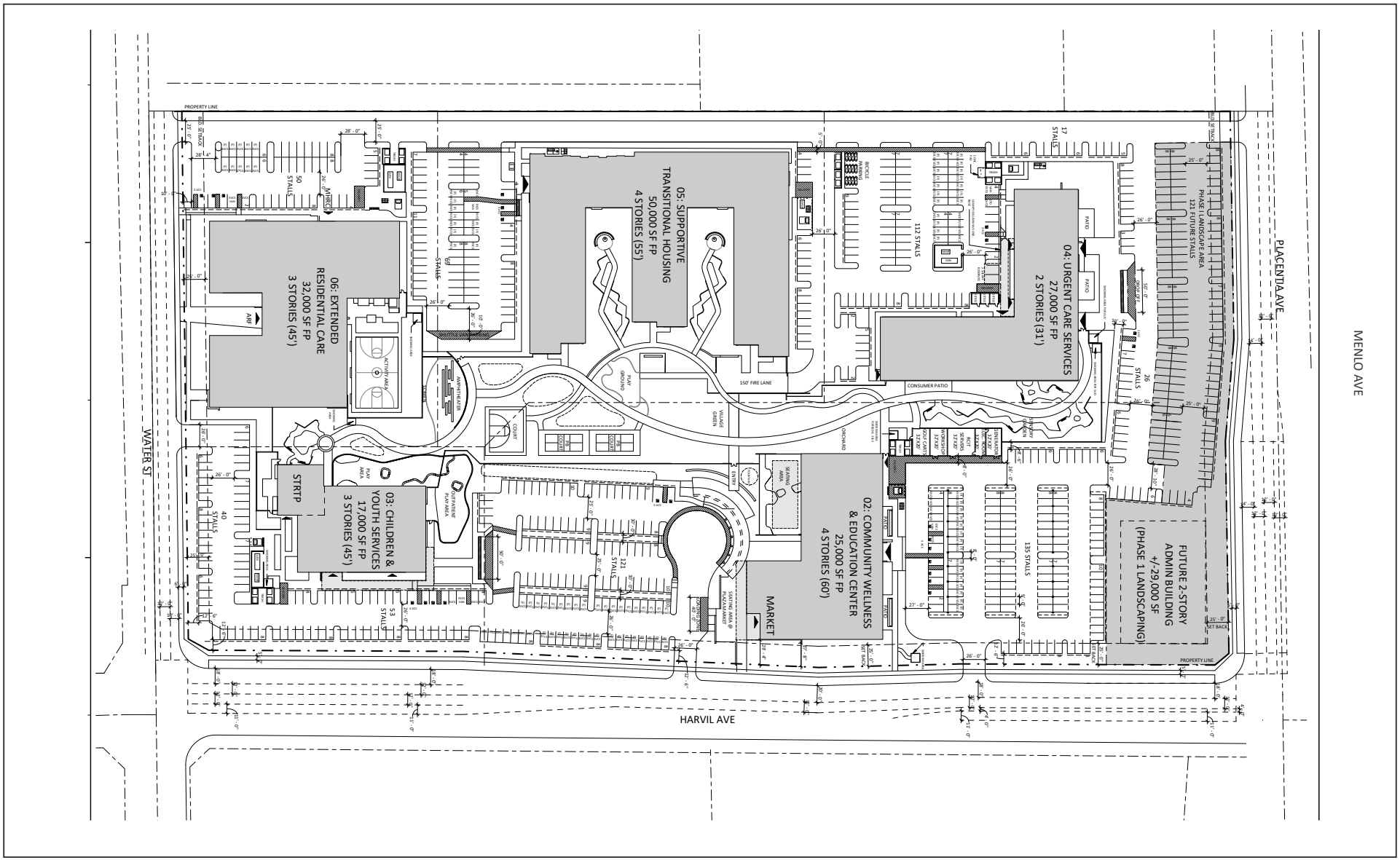

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FIGURE 2-3

0 110 220

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SOURCE: Boulder Associates

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Mead Valley Wellness Village Project

Site Plan

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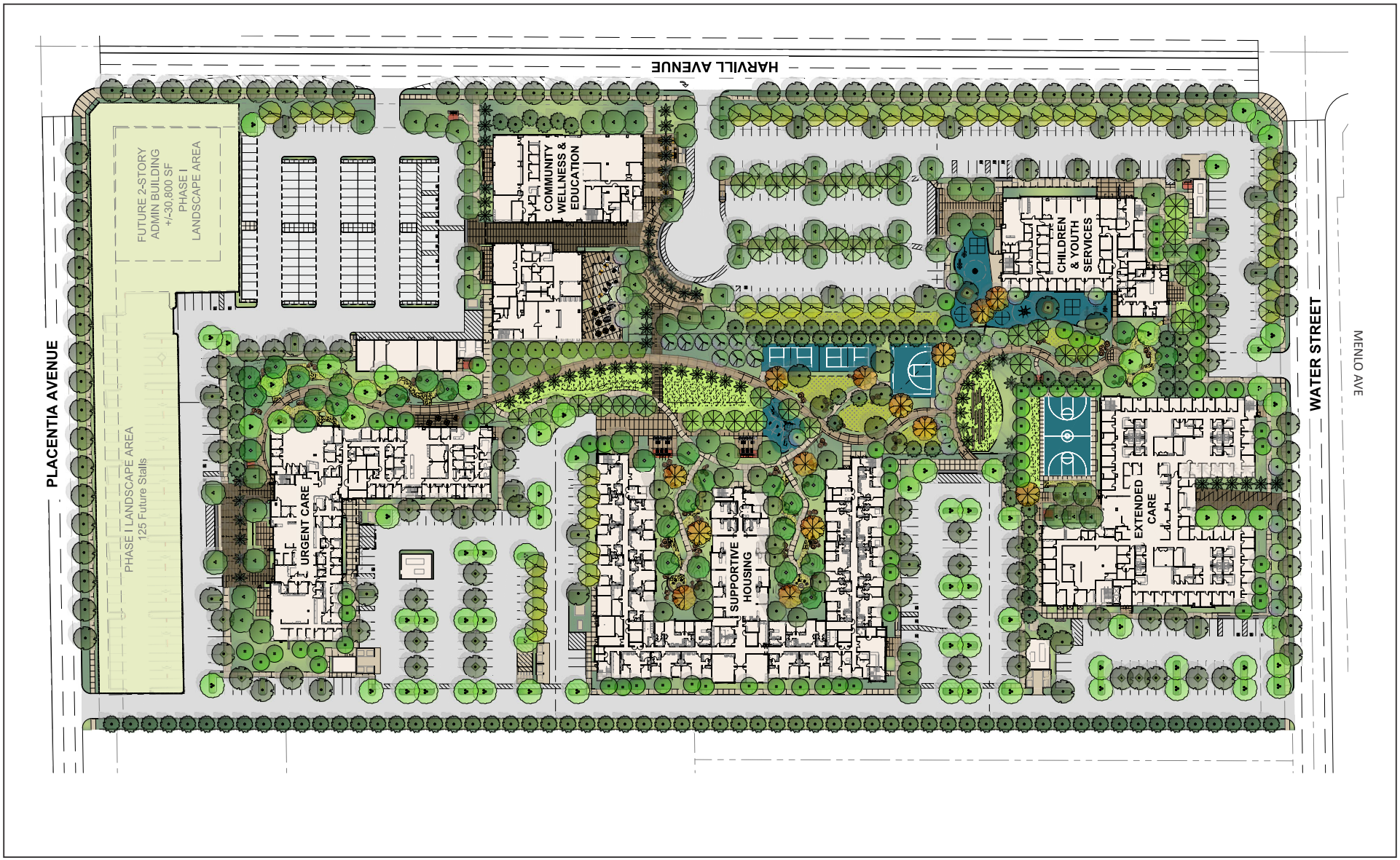

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FIGURE 2-4

N

0 75 150
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SOURCE: Boulder Associates

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Mead Valley Wellness Village Project

Conceptual Landscape Plan

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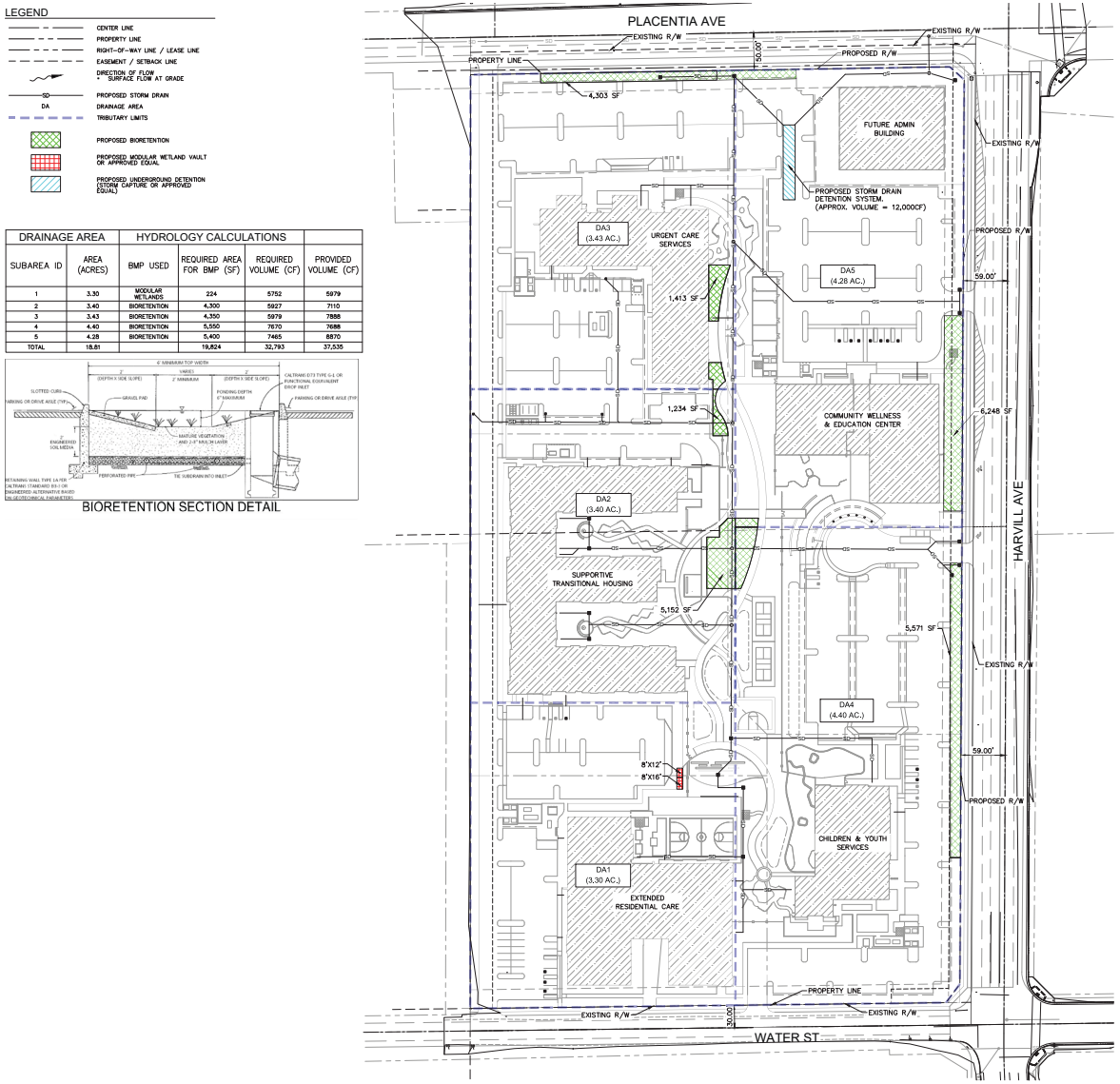

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FIGURE 2-5

0 125 250

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SOURCE: Boulder Associates

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Mead Valley Wellness Village Project

Stormwater Exhibit

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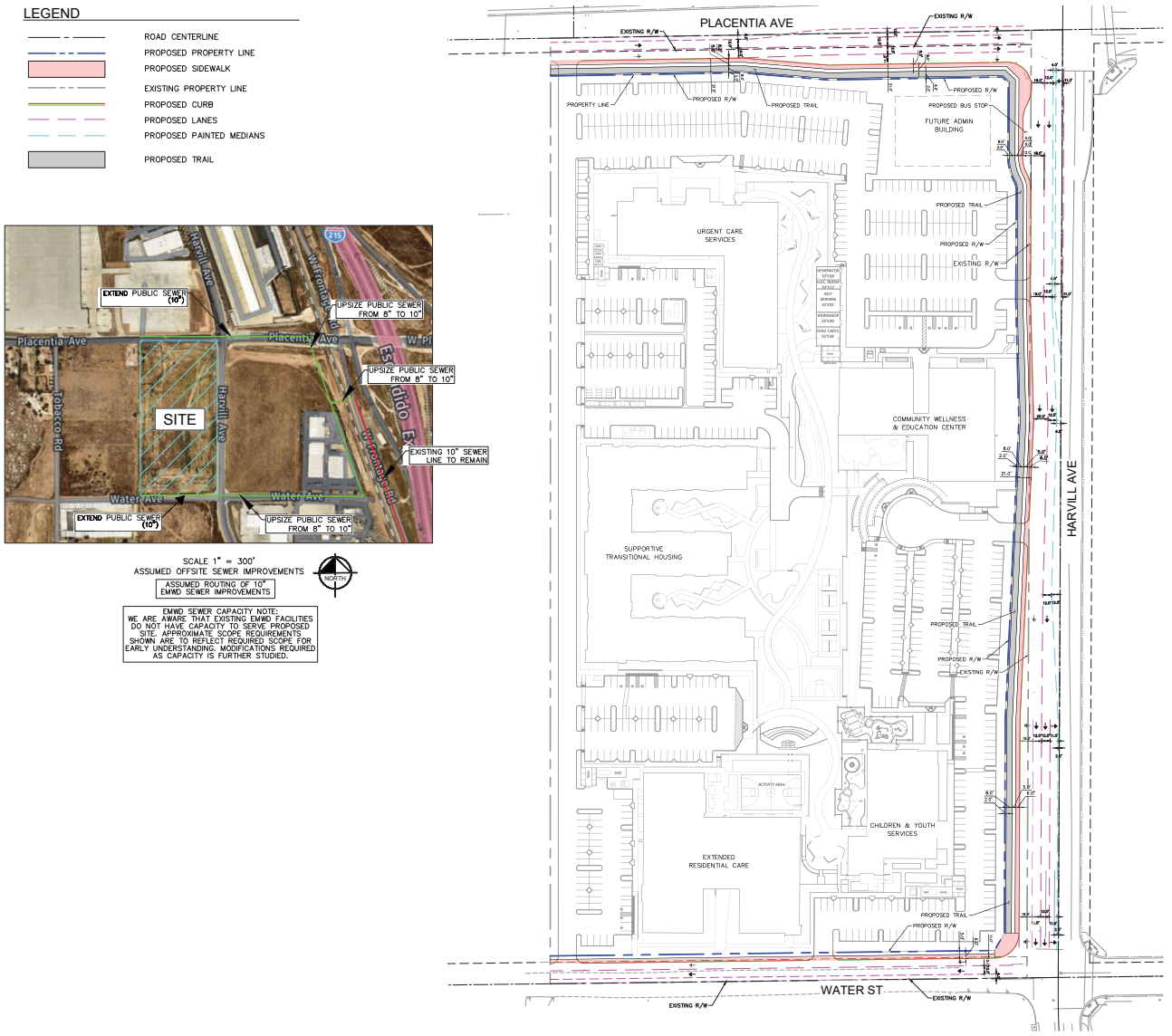

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FIGURE 2-6

0 125 250

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SOURCE: Boulder Associates

Mead Valley Wellness Village Project

Off-Site and Sewer Improvements

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3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist in Chapter 4.0.

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

DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "Potentially Significant Impact" or "Potentially Significant Unless Mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Michael Sullivan, Senior Environmental Planner

1-10-2024
Date

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act (CEQA) process, an effect has been adequately analyzed in an earlier EIR or [mitigated] negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a. **Earlier Analysis Used:** Identify and state where they are available for review.

    b. **Impacts Adequately Addressed:** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. **Mitigation Measures:** For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared

or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to less than significant.

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4.0 CEQA ENVIRONMENTAL CHECKLIST

4.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
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 a 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?	☐	☐	☒	☐

4.1.1 Impact Analysis

a. Would the project have a substantial effect on a scenic vista?

Less Than Significant Impact. A scenic vista is a view of an area that is visually or aesthetically pleasing. Scenic vistas often refer to views of natural lands but may also be compositions of natural and developed areas. Scenic vistas can include vistas of undisturbed natural areas, unique or unusual features forming an important or dominant portion of a viewshed, and distant vistas offering relief from less attractive nearby features. The project site is located in unincorporated Riverside County within the boundaries of the Mead Valley Area Plan of the Riverside County General Plan. The Mead Valley Area Plan is surrounded by the incorporated city of Perris and the nearby cities of Lake Elsinore, Canyon Lake, Riverside, and Moreno Valley. The Mead Valley planning area contains a wide variation in physical terrain, including flat valley floors, foothills, and steep hillsides. The area lies entirely within the larger Perris Valley, which is framed by the Gavilan Hills to the west, and the Lakeview Mountains across the valley to the east. The eastern flank of Mead Valley is generally flat, sloping gently upward toward the Gavilan Hills, which form a portion of the planning area's western boundary.

Goals and policies contained in the Riverside County General Plan and the various Area Plans are used to implement the Riverside County Vision. The Riverside County Vision emphasizes the value of its environmental setting, and the Mead Valley area is situated to provide views of the surrounding mountains in almost every direction. The Mead Valley Area Plan identifies the Gavilan Hills, Steele Peak, and Motte-Rimrock Reserve as unique features.[2] The Mead Valley planning area also contains a

[2] County of Riverside. 2021. *County of Riverside General Plan, Mead Valley Area Plan*. September 28.

variety of open spaces that encompass multiple habitats including riparian corridors, oak woodlands, and chaparral habitats, that can be found in and around Steele Peak, Gavilan Hills, Cajalco Creek, the San Jacinto River, and the Motte-Rimrock Reserve. The preservation of the scenic background and the natural resources of these areas are important to achieving the County of Riverside (County) planning goals and the Riverside County Vision, which emphasize the preservation of Riverside County's natural setting and unique features.[3]

As identified in the Mead Valley Area Plan, the major scenic resources in the planning area are Steele Peak, Gavilan Hills, Cajalco Creek, the San Jacinto River, and the Motte-Rimrock Reserve. Scenic qualities offered by these areas include prominent ridgelines, scenic corridors and canyons, view corridors, and vista points.

The project site is currently undeveloped and vegetated primarily by nonnative annual grasses and a few mature trees, including two native California fan palm (*Washingtonia filifera*) trees, a nonnative Peruvian pepper tree (*Schinus molle*), an olive tree (*Olea europaea*), and a Chinese elm tree (*Ulmus parvifolia)*. Properties surrounding the site have been developed with residential and commercial uses. Numerous parcels in the vicinity remain undeveloped.

The proposed Wellness Village would be located on flat land in an area designated for development within the Mead Valley Area Plan of the Riverside County General Plan. The project site is approximately 5.5 miles northeast of Steele Peak, 3 miles northeast of the Gavilan Hills, 3.8 miles southeast of Cajalco Creek, and 4 miles northwest of the San Jacinto River, and offers no views of these scenic resources due to intervening development and topography. However, the project site is located approximately 0.5 mile northeast of the Motte-Rimrock Reserve and offers views of the associated ridgeline. The proposed project would include the construction of five public health buildings ranging in height from one to three stories. Implementation of the proposed project could partially obscure views of the Motte-Rimrock Reserve ridgeline (located southwest of the project site) from adjacent industrial uses east of the project site and temporarily obscure views for people traveling along short segments of Harvill Avenue and Placentia Avenue; however, views of this scenic feature would not be obscured by the proposed project from any other perspectives. In addition, although the project site would be distantly visible from the Motte-Rimrock Reserve, implementation of the proposed project would be visually consistent to the surrounding development and would not contrast with or substantially impact scenic views from the reserve. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista. Impacts would be **less than significant**, and no mitigation is required.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. According to the Mead Valley Area Plan, there are no designated State Scenic Highways located within the immediate project vicinity or plan area. The closest eligible State Scenic Highway is the portion of State Route 74 (SR-74) west of Perris, extending from the Perris/Riverside County line to the Elsinore Area Plan area, approximately 2.8 miles south of the project site. The project site is not visible from SR-74 due to intervening development. Therefore, the project will not affect any

[3] County of Riverside. 2021. *County of Riverside General Plan, Mead Valley Area Plan*. September 28.

scenic resources within a State Scenic Highway**. No impact** would occur, and no mitigation is required.

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 a 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?

Less Than Significant Impact. The project site is located within the Riverside-San Bernardino Urbanized Area,[4] which includes unincorporated areas that meet the Census Bureau's definition of an Urbanized Area.[5] As such, the project site meets the definition of an Urbanized Area under Section 15387 of the *State CEQA Guidelines*. Scenic quality is a measurement of the visual appeal of an area and refers to the pleasing view of scenery.

During construction, vehicles and equipment would be visible during vegetation removal, installation of structures and features, laying of asphalt and concrete, and other visible general construction activity. However, the presence of construction equipment would be temporary and would cease once construction is complete. Moreover, construction equipment would not substantially obstruct existing public view of the site and its surroundings. Due to the temporary nature of construction activities, impacts to the scenic quality of the site and its surroundings would be less than significant during construction, and mitigation is not required.

According to the County's Zoning Map and General Plan, the project site is currently zoned as Manufacturing-Service Commercial (M-SC) and designated as Business Park (BP) in the County's General Plan and Mead Valley Area Plan. The M-SC zoning district allows for service and commercial uses (e.g., retail, office, health and exercise centers, vehicle repair shops, and laboratory use) and the BP designation is intended for employee-intensive uses, including research and development, technology centers, corporate office, clean industry, and supporting retail uses. The proposed project would be required to adhere to the development standards of the M-SC zoning designation. Specifically, the proposed project would be required to provide landscaping on at least 10 percent of the project site and provide a minimum 10-foot strip of landscaping adjacent to street right-of-way lanes. The proposed project would develop the project site with a succulent garden, a butterfly/hummingbird garden, a meadow garden, and a shade/fern garden, resulting in approximately 180,599 square feet of landscaping (approximately 21 percent of the project site). In addition, 62,023 square feet of the project site, at the location of the future two story, 20,000-square-foot administrative/office building, would be irrigated and hydroseeded; however, this landscaped area would be removed with development of the future building and associated parking. Because the proposed project would landscape approximately 21 percent of the project site, the proposed project would be consistent with the landscaping requirements of the M-SC zoning district. In addition, as discussed in the Riverside County General Plan and Mead Valley Area Plan

[4] Census Reporter. 2022. Riverside—San Bernardino, CA Urbanized Area. Website: https://censusreporter.org/profiles/40000US75340-riverside-san-bernardino-ca-urbanized-area/ (accessed October 25, 2023).

[5] According to the Census Bureau, an Urbanized Area is characterized as containing a population of more than 50,000 persons.

Consistency Analysis in Section 4.11, Land Use and Planning, the proposed project would not conflict with any General Plan or Area Plan policy regarding scenic quality. As such, the proposed project would be consistent with the applicable zoning and other regulations governing scenic quality at the project site.

As discussed above, the major scenic resource in proximity to the project site is the Motte-Rimrock Reserve, which is approximately 0.5 mile southwest of the project site. In addition, on clear days, the project site would also provide partial views of distant hills and mountain ridgelines to the north and east. Although implementation of the proposed project could partially obscure existing distant views of the surrounding ridgeline temporarily while traveling along short segments of Harvill and Placentia Avenues, views of these scenic features would still be available from all other perspectives.

The project site and the immediate surrounding area is flat; however, low-lying hills are located to the west of the site. The surrounding viewscape to the north, east, and south is comprised of urban development, with views of some undeveloped parcels, and the viewscape to the west is comprised of the adjacent hills. The project's landscaping palette would include a mixture of "California-friendly"[6] trees, shrubs, and ground cover to help integrate the new buildings into the existing setting and to reduce water use. Therefore, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be **less than significant**, and mitigation is not required.

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

Less Than Significant Impact. Existing light sources at the project site consist of lighting from existing adjacent land uses and streets. New development would result in new light sources, such as parking lot lighting, interior and exterior building lighting (included for safety purposes), vehicle headlights, and limited illuminated signage. These new sources of light would be visible from neighboring development and along adjacent roadways.

The proposed project would be required to comply with County Ordinance No. 655, which restricts new development from incorporating light fixtures that would create undesirable light rays into the night sky and detrimentally affect astronomical observations and research, and applicable sections of the Energy Code that regulate outdoor lighting. Interior lighting would be designed to prevent direct illumination beyond the building envelope, and all on-site exterior lighting would be shielded and aimed toward specific areas to prevent direct illumination beyond the project site. Low-level exterior lights would also be located along pathways and near buildings to serve security and wayfinding purposes, as well as to accent signage, architectural features, and landscaping features. Because this lighting would be at low levels, it is not anticipated to cause substantial light that would adversely affect day or nighttime views in the area. In addition, proposed lighting would have specialized optics and glare control to ensure compliance with regulations and guidelines, preventing adverse lighting impacts on neighboring properties. Overall, the lighting design of the proposed project would

[6] A California Friendly® Landscape is defined as one that is drought tolerant, aesthetically pleasing, and sustainable in accordance with the California Friendly® Maintenance Guide for Landscapers, Gardeners, and Land Managers (Douglas Kent + Associates, March 2017).

prioritize on-site efficiency while minimizing light trespass, reducing sky-glow, and improving nighttime visibility through glare reduction.

In addition, the selection of building materials and colors, including installation of photovoltaic panels atop carports, would be designed to reduce the potential for daytime architectural glare and to blend in with the surrounding environment. The proposed project would include spectrally selective low-e glazing windows for the proposed buildings in order to reduce solar heat gain through the windows and provide ample daylight and views to the occupants. These types of windows have a reflectance value of 11 percent. Building materials with a solar reflective value of 20 percent or more are considered to cause issues relating to glare.[7] Because the proposed windows have a reflectance value of less than 20 percent, the proposed project is not anticipated to cause significant glare that would affect the surrounding area.

The proposed project would not generate sources of light and/or glare that would be substantial when compared to the existing condition (e.g., vehicle lights along adjacent roadways, and residential and commercial facility lights from adjacent developed uses) in the project vicinity. Therefore, impacts from light and glare would be **less than significant**, and mitigation is not required.

[7] Personal communication with Mila Volkova, AIA, LEED Green Associate and Senior Associate at Boulder Associates in November 2023.

4.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation (DOC) as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection (CAL FIRE) regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project, and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (CARB).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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 zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. 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))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. 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?	☐	☐	☒	☐

4.2.1 Impact Analysis

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?

Less Than Significant Impact. The project site is currently undeveloped and does not contain any agriculture or forest uses. According to the DOC's Farmland Mapping and Monitoring Program (FMMP), a majority of the project site is located within an area considered to be Farmland of Local Importance with the northwestern portion of the project site designated as Other Land.[8] Farmland

[8] California Department of Conservation (DOC). n.d. Farmland Mapping and Monitoring Program, California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed October 25, 2023).

of Local Importance includes land that is important to the local agricultural economy as determined by the County's Board of Supervisors and a local advisory committee. Other Land is non-agricultural land that is not included in any other mapping category. The FMMP identifies other areas considered to be Farmland of Local Importance to the north, south, east, and west of the project site. Small areas of Urban and Built-up Land and Other Land are also depicted intermixed with the areas of Farmland of Local Importance that surround the project site.

According to the Mead Valley Area Plan and the County's zoning map, the project site is designated as Business Park (BP) and zoned as Manufacturing-Service Commercial (M-SC). The BP designation is intended for employee-intensive uses, including research and development, technology centers, corporate office, clean industry, and supporting retail uses. The M-SC zoning district is intended to provide for the development of industrial and manufacturing uses, including food, textile, lumber and wood, paper, chemicals, leather, stone, glass, concrete, and metal products as well as machinery, electrical equipment, transportation and related industries, engineering instruments, mining, and kennels and catteries. The M-SC zoning district also allows for service and commercial uses (e.g., retail, office, health and exercise centers, vehicle repair shops, and laboratory use). Meat packing plants, cemeteries, distilleries, acid manufacturing, fertilizer production, airports, and solar power are conditionally permitted on the project site. Although the BP land use designation does not allow for agricultural use of the project site,[9] the M-SC zoning district allows for agricultural uses of the soils for crops, including the grazing of not more than two mature farm animals per acre and their immature offspring.[10]

Although the project site is classified as Farmland of Local Importance, the project site is designated for BP uses, an urban land use designation intended to accommodate heavy employment and supporting retail uses. According to available historical sources, the project site appears to have been agricultural land from as early as 1938 to 1970. Agricultural use appears to have ceased by the 1990s. Although the project site has an historical use as agricultural land, the project site has not been used for agriculture production since 2009, remaining fallow and undeveloped since then. Moreover, as discussed above, the project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Because the proposed project would develop urban land uses on the project site, consistent with the BP designation as detailed in the Mead Valley Area Plan, implementation of the proposed project would not result in any conversion of designated Prime Farmland, Unique Farmland, or Farmland of Statewide importance to a non-agricultural use. Impacts would be **less than significant**, and no mitigation is required.

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

No Impact. The project site is currently zoned for Manufacturing-Service Commercial (M-SC) and is designated for Business Park (BP). The project site is not currently used for any agricultural purposes, and there are no Williamson Act contracts associated with the project site. In addition, as described

[9] County of Riverside. 2021a. County of Riverside General Plan, Chapter 3: Land Use Element, page LU-60. September 28.

[10] County of Riverside. n.d. Code of Ordinances, Title 17. Zoning, Chapter 17.100. M-SC Manufacturing-Service Commercial Zone. Website: http://riversidecounty-ca.elaws.us/code/coor_title17_ch17.100_sec17.100.020 (accessed October 25, 2023).

above, the BP land use designation does not allow for agricultural use of the project site. Although the M-SC zoning district allows for agricultural uses of the soils for crops, including the grazing of not more than two mature farm animals per acre and their immature offspring, the purpose of the M-SC zoning district is to provide for manufacturing, service, and commercial uses. Because the proposed project would develop a health service use on the project site, consistent with the M-SC zoning district, implementation of the proposed project would not result in conflicts regarding agricultural zoning use or a Williamson Act contract. **No impact** would occur, and no mitigation is required.

c. 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))?

No Impact. In reference to California's Public Resources Code (PRC) Section 1220(g), PRC Section 4526, or Government Code Section 51104(g), the project site currently is not used for timberland production, is not zoned as forest land or timberland, and does not contain any forest land or timberland defined in the State code. Therefore, **no impact** to forest land or timberland would occur, and no mitigation is required.

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

No Impact. The project site is currently undeveloped. As a result of regular discing, the vegetation on the project site consists of nonnative grassland, two native California fan palm trees and several nonnative trees (e.g., Peruvian pepper, olive, and Chinese elm). As such, the project site does not contain any forestland. Moreover, the future project use would not involve converting any forest land into non-forest use. As such, construction of the proposed project would not involve any environmental changes that would result in the conversion of forest land to a non-forest use. Therefore, **no impact** would occur, and no mitigation is required.

e. 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?

Less Than Significant Impact. As discussed in the responses to Checklist Questions 4.2a and 4.2b, no agricultural operations are located on, adjacent to, or near the project site. Because no agricultural uses exist on site, the proposed project would not result in the direct conversion of agricultural land to a non-agricultural use. As previously discussed, according to the DOC FMMP, a majority of the project site is located within an area considered to be Farmland of Local Importance, with the northwestern portion of the project site designated as Other Land. Farmland of Local Importance includes land that is important to the local agricultural economy as determined by the County's Board of Supervisors and a local advisory committee. The map identifies other areas considered to be Farmland of Local Importance to the north, south, east, and west of the project site. Small areas of Urban and Built-up Land and Other Land are also depicted intermixed with the areas of Farmland of Local Importance that surround the project site. Although portions of the surrounding area are designated as Farmland of Local Importance, no existing agriculture uses are present on any of the properties.

No contiguous agricultural lands or forestry uses exist on or in the vicinity of the project site. Due to the absence of agricultural and forestry use, **less than significant impacts** would occur, and no mitigation is required.

4.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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 to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

This section analyzes air quality-related impacts associated with development facilitated by the proposed project, including temporary air quality impacts relating to construction activity and long-term air quality impacts from operation. The project site is within the South Coast Air Basin (Basin), which is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The regional climate in the Basin is semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The South Coast Air Quality Management District (SCAQMD) is the regional government agency that monitors and regulates air pollution within the Basin. The federal Clean Air Act (CAA) and the California Clean Air Act (CCAA) mandate the control and reduction of specific air pollutants. Under these acts, the United States Environmental Protection Agency (EPA) and the CARB have established ambient air quality standards (AAQS) for specific "criteria" pollutants, which are designed to protect public health and welfare. Primary criteria pollutants include carbon monoxide (CO), volatile organic compounds (VOCs), nitrogen oxides (NO_X), particulate matter less than 10 microns in size (PM_{10}), sulfur dioxide (SO_2), and lead (Pb). Secondary criteria pollutants include ozone (O_3), and particulate matter less than 2.5 microns in size ($PM_{2.5}$). The AAQS for each criteria pollutant represents the level that is considered safe for the public and avoids specific adverse health effects associated with each criteria pollutant.

The Basin is in nonattainment for the federal and State standards for O_3 and $PM_{2.5}$, and nonattainment for the State PM_{10} standard. In addition, the Basin is in attainment/maintenance for the federal PM_{10}, CO, SO_2, and nitrogen dioxide (NO_2) standards. The SCAQMD has established project-level thresholds for VOCs, NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$ as shown in Table 4.3.A. The SCAQMD considers any project in the Basin with construction- or operation-related emissions that exceed any of the emission thresholds presented in Table 4.3.A below to have potentially significant impacts.

Table 4.3.A: SCAQMD Construction and Operation Thresholds of Significance

Emissions Source	Pollutant Emissions Threshold (lbs/day)					
	VOCs	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction Thresholds	75	100	550	150	150	55
Operation Thresholds	55	55	550	150	150	55

Source: South Coast AQMD Air Quality Significance Thresholds (SCAQMD 2023).
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_2 = sulfur dioxide
VOCs = volatile organic compounds

Air pollutant emissions generated by project construction and operation were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1. CalEEMod uses project-specific information, including the project's land uses, square footage for different uses (e.g., residential and parking), and location to model a project's construction and operational emissions. The analysis reflects the construction and operation of the project as described in Chapter 2.0, Project Description.[11]

Localized Significance Thresholds. In addition to the above regional thresholds, the SCAQMD has developed localized significance thresholds (LSTs) in response to concern regarding exposure of individuals to criteria pollutants in local communities. The SCAQMD published its Final LST Methodology in June 2003 (updated July 2008), recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors.[12] LSTs have been developed for NO_X, CO, PM_{10}, and $PM_{2.5}$ and represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) at the nearest sensitive receptor. The SCAQMD LST guidance was used to analyze potential localized air quality impacts associated with construction of the proposed project. LSTs are developed based on the size or total area of the emission source, the ambient air quality in the source receptor area, and the distance between the project and the nearest sensitive receptor. The SCAQMD defines structures that house people (e.g., children, the elderly, people with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather as sensitive receptors (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields). As shown on Figure 2-2 in Chapter 2.0, Project Description, the nearest sensitive receptor in proximity to the project site are single-family residences immediately west of the project site (the buildings are approximately 30 feet from the project site

[11] The CalEEMod analysis evaluated project construction emissions with a start date of January 3, 2024, and a duration of 24 months. The proposed project's construction schedule has since been modified such that project construction would occur over a 31-month duration with a start date of June 3, 2024. This minimal modification to the project construction schedule was reviewed by LSA and it was determined that the modified construction duration would not result in any more severe air quality or greenhouse gas impacts than what is described within.

[12] South Coast Air Quality Management District (SCAQMD). 2008. *Final Localized Significance Threshold Methodology*. July. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed June 2023).

boundary). Additional nearby sensitive receptors include single-family residences west of the project site. Those residential buildings are approximately 755 feet from the project site boundary to the residential buildings.

LSTs are based on the ambient concentrations of that pollutant within the project Source Receptor Area (SRA) and the distance to the nearest sensitive receptor. For the proposed project, the appropriate SRA for the LST is the Perris Valley SRA (SRA 24). SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. As mentioned above, the closest sensitive receptors to the project site are single-family residences immediately west of the project site (approximately 30 feet west of the project site boundary). SCAQMD recommends using the 82-foot (25-meter) buffer zone LST for sensitive receptors closer than 25 meters. As such, the minimum distance of 25 meters was used.

SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres. If the project exceeds the LST look-up values, then SCAQMD recommends that project-specific air quality modeling must be performed to determine if the project's local emissions exceed applicable significance thresholds. While the project site is approximately 19.41 acres, based on the anticipated construction equipment and anticipated grading and ground-disturbing activities, the maximum daily disturbed area for the proposed project would be 5 acres. The maximum number of acres disturbed is determined on the construction equipment list (including type of equipment, horsepower, and hours of operation) assumed for the day of construction activity and maximum emissions.[13] Therefore, the LSTs for a 5-acre site at 25 meters were derived by interpolation using the project's SRA and mass rate look-up tables developed by the SCAQMD. Table 4.3.B shows the LST emissions thresholds that would apply based on the size of the project site (greater than 5 acres) and the distance to nearby receptors during project construction and operation (82 feet from receptor), respectively. As mentioned above, LST emission thresholds are used to determine localized air quality impacts during construction and operation of the proposed project. Since LSTs are developed based on the SRA, distance to a nearby sensitive receptor, and disturbed area in acres, they would not be applicable to determine the project's regional air quality impacts and are used for evaluating impacts to sensitive receptors from substantial pollutant concentrations.

Table 4.3.B: SCAQMD Localized Significance Thresholds

Emissions Source	Localized Pollutant Emissions Threshold (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction	270.0	1,577.0	13.0	8.0
Operations	270.0	1,577.0	4.0	2.0

Source: *Final Localized Significance Threshold Methodology* (SCAQMD 2008).
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District

[13] South Coast Air Quality Management District (SCAQMD). n.d. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf (accessed June 2023).

Toxic Air Contaminants Thresholds. SCAQMD has developed significance thresholds for the emissions of toxic air contaminants (TACs) based on health risks associated with elevated exposure to such compounds. For carcinogenic compounds, cancer risk is assessed in terms of incremental excess cancer risk. A project would result in a potentially significant impact if it would generate an incremental excess cancer risk of 10 in 1 million (1×10^{-6}) or a cancer burden of 0.5 excess cancer cases in areas exceeding 1 in 1 million risk. Additionally, non-carcinogenic health risks are assessed in terms of a hazard index. A project would result in a potentially significant impact if it would result in a chronic and acute hazard index greater than 1.0.[14]

3.3.1 Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. An Air Quality Management Plan (AQMP) describes air pollution control strategies in a region classified as a nonattainment area to meet the requirements of the CAA. The main purpose of an AQMP is to bring an area into compliance with the requirements of the NAAQS and the CAAQS. The Basin is in nonattainment for the NAAQS and CAAQS for O_3 and $PM_{2.5}$ and nonattainment for PM_{10} for CAAQS only. Therefore, the Basin is classified as a nonattainment area and an AQMP is required. The applicable air quality plan is the SCAQMD's adopted *2022 Air Quality Management Plan*.[15] The *2022 Air Quality Management Plan* is based on regional growth projections developed by the Southern California Association of Governments (SCAG).

A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the California Environmental Quality Act (CEQA) goal of informing local agency decision-makers of the environmental impacts of the project under consideration at a stage early enough to ensure that air quality concerns are addressed.

The proposed project would include the Wellness Village, which would consist of five public health buildings totaling approximately 450,361 square feet. The proposed project is not considered a project of statewide, regional, or area-wide significance (large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential development of more than 500 dwelling units, a shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space) as defined in the California Code of Regulations (CCR Title 14, Division 6, Chapter 3, Article 13, §15206(b)). Because the proposed project would not be defined as a regionally significant project under CEQA, it does not meet the SCAG Intergovernmental Review criteria. The County's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines (RCP Guidelines) and the SCAQMD AQMP. The SCAG RCP Guidelines is a holistic strategic plan document that aims to define and solve interrelated challenges such as housing, traffic, air quality, and other regional challenges. The County's General Plan contains goals and policies that align with the goals of the SCAQMD AQMP and SCAG RCP Guidelines to enforce and

[14] South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook* (currently under revision).

[15] South Coast Air Quality Management District (SCAQMD). 2022. *2022 Air Quality Management Plan*. December 2.

reduce emissions pertaining to air quality and other interrelated elements. Pursuant to the methodology provided in the SCAQMD *CEQA Air Quality Handbook*, consistency with the SCAQMD's *2022 Air Quality Management Plan* is affirmed when a project: (1) would not increase the frequency or severity of an air quality standards violation or cause a new violation, and (2) is consistent with the growth assumptions in the AQMP. Consistency review is presented as follows:

- **Indicator 1:** The proposed project would result in short-term construction and long-term operational pollutant emissions. However, as demonstrated in Section 4.3(b) and in Table 4.3.C (Short-term Regional Construction Emissions) and Table 4.3.D (Project Operational Emissions), which are provided later, the proposed project would not exceed the significance criteria for daily VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, construction and operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable NAAQS or CAAQS. Therefore, the proposed project would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standards violation.

- **Indicator 2:** The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include (without limitation) airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities. The project would consist of five public health buildings with associated amenities, surface parking, short-term residential facilities for patients, landscaping, and walkways set in a campus setting; therefore, the proposed project would not be defined as significant. In addition, the proposed project would not require a change to the General Plan land use designation or the current zoning, and would be consistent with the County's General Plan and Zoning Ordinance.

Based on the consistency analysis presented above, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be **less than significant**, and no mitigation is required.

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?

Less Than Significant Impact. As identified above, the Basin is currently designated as nonattainment for the NAAQS and CAAQS for O_3 and $PM_{2.5}$ and nonattainment for PM_{10} for the CAAQS only. The Basin's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's existing air quality on a cumulative basis. By its very nature, air quality is largely a cumulative issue. No single project is sufficient in size to, by itself, result in nonattainment of the CAAQS or NAAQS. Instead, a project's individual emissions contribute to existing attainment or nonattainment within an air basin. However, if a project's individual contribution to a region in nonattainment is cumulatively considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified SCAQMD significance thresholds identified above in Table 4.3.A, the emissions would be cumulatively considerable, thereby resulting in significant adverse air quality impacts to the region's existing air quality conditions. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by site preparation and grading activities. Emissions from construction equipment are also anticipated and would include CO, NO_X, VOCs, directly emitted $PM_{2.5}$ or PM_{10}, and TACs (e.g., diesel exhaust particulate matter [DPM]).

Project construction activities would include site preparation, grading, utility trenching, ground improvement, building construction, architectural coating, and paving activities, which have the potential to generate air pollutant emissions. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the use of heavy equipment and the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. SCAQMD has established Rule 403: Fugitive Dust, which would require the Project Applicant to implement measures that would reduce the amount of particulate matter generated during the construction period. The Rule 403 measures that were incorporated in this analysis include:

- Water active sites at least three times daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.

As discussed in Section 4.10, Hydrology and Water Quality, construction activities would be subject to the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit [CGP]), Order No. 2022-0057-DWQ, NPDES No.

CAS000002.[16] Any construction activity, including grading, that would result in the disturbance of 1 acre or more would require compliance with SWRCB's CGP, which requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of Construction Best Management Practices (BMPs) during construction activities. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. Erosion Control and Sediment Control BMPs may include, but are not limited to, chemical stabilization, compost blankets, dust control, geotextile, matting, and netting, mulching, riprap, and wind/sand fences.[17]

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO_X), NO_X, VOCs, and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using CalEEMod. Construction of the proposed project would begin in 2024 and would be completed by 2026, which was included in CalEEMod. This analysis assumes compliance with SCAQMD Rule 403 measures. Construction equipment, number of equipment, horsepower, and hours of operation were provided by the Project Applicant and included in CalEEMod (**Appendix A**). This analysis conservatively assumes the use of Tier 2 construction equipment, except for cranes, forklifts, and generator sets, which were assumed to use Tier 4 Final engines as provided by the Project Applicant. In addition, construction activities would require the soil export of approximately 6,000 cubic yards, which was also included in CalEEMod. Default assumptions (e.g., construction worker and truck trips and fleet activities) from CalEEMod were used where project-specific information is not available. Construction emissions are summarized in Table 4.3.C and compared against the respective SCAQMD threshold. **Appendix A** provides the CalEEMod output sheets.

As shown in Table 4.3.C, construction emissions associated with the project would not exceed the SCAQMD's thresholds for VOC, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10}. Therefore, construction of the proposed project would not result in a cumulatively considerable increase of any criteria pollutant for which the project region is in nonattainment under an applicable NAAQS or CAAQS. Impacts would be **less than significant,** and no mitigation is required.

[16] NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ, NPDES No. CAS000002)

[17] United States Environmental Protection Agency (EPA). *National Pollutant Discharge Elimination Systems (NPDES), National Menu of Best Management Practices (BMPs) for Stormwater-Construction.* Website: https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater-construction (accessed December 4, 2023).

Table 4.3.C: Short-Term Regional Construction Emissions

Construction Year	Total Daily Regional Pollutant Emissions (lbs/day)							
	VOCs	NO_X	CO	SO_X	Fugitive PM_{10}	Exhaust PM_{10}	Fugitive $PM_{2.5}$	Exhaust $PM_{2.5}$
2024	2.9	94.3	69.0	0.1	7.9	2.5	3.0	2.3
2025	23.1	21.5	73.3	0.1	6.7	0.7	1.6	0.7
2026	20.4	2.5	6.1	<0.1	1.0	0.1	0.2	0.1
Peak Daily Emissions	**23.1**	**94.3**	**73.3**	**0.1**	**10.4**		**5.3**	
SCAQMD Threshold	**75.0**	**100.0**	**550.0**	**150.0**	**150.0**		**55.0**	
Significant?	**No**	**No**	**No**	**No**	**No**		**No**	

Source: Compiled by LSA Associates, Inc. (November 2023).
Note: It was assumed that the architectural coatings were applied during the building construction phase. Peak daily emissions of VOCs and CO emissions occurred during the overlapping building construction and architectural coating phases.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

Operational Emissions. The proposed project would generate emissions from daily operations and vehicle trips associated with project operations. The project would consist of public health buildings with associated amenities, surface parking, short-term residential facilities for patients, landscaping, and walkways set in a campus setting. Long-term air pollutant emissions associated with operation of the proposed project include emissions from the area (e.g., stationary, energy, and mobile sources) and are discussed below. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source.

Typically, area source emissions consist of direct sources of air emissions located at the project site, including architectural coatings and the use of landscape maintenance equipment. Area source emissions associated with the project would include emissions from the use of landscaping equipment and consumer products. Stationary source emissions would be associated with the use of the four on-site diesel back-up generators; however, the diesel generators would only be expected to run approximately 50 hours per year each during routine testing and maintenance.

Mobile source emissions would be generated by the vehicle trips associated with project operations. The project's trip generation used in CalEEMod was based on the Transportation Analysis prepared for the project (**Appendix H**),[18] which estimated that the proposed project would generate 2,862 average daily trips. PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM_{10} occurs when vehicle tires pulverize small rocks and pavement and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other PM emission processes. Additionally, gasoline-powered engines have small rates of PM emissions compared to diesel-powered vehicles.

Energy source emissions result from activities in buildings for which electricity and natural gas are used. Major sources of energy demand include building mechanical systems (e.g., heating and air

[18] LSA Associates, Inc. 2024. *Transportation Analysis, Mead Valley Wellness Village Project*. January.

conditioning, lighting, and plug-in electronics such as computers). Greater building or appliance efficiency reduces the amount of energy for a given activity, which lowers the resultant emissions. The emission factor is determined by the fuel source. Therefore, cleaner energy sources, such as renewable energy, produce fewer emissions than conventional sources. Buildings would include natural gas for water heating. In addition, the Community Wellness and Education Center building, Children and Youth Services building, and Urgent Care Services building would include commercial-grade kitchens that would also utilize natural gas. However, mechanical heating for all buildings would be all electric. The proposed project would also include solar panels. However, no reductions were accounted for in the analysis to reflect solar since the associated energy savings have not yet been determined.

Long-term operational emissions associated with the proposed project were calculated using CalEEMod. As mentioned above, the proposed project would include a market, along with the other amenities as outlined in the project description. The market would be operated by a third-party and is intended to primarily serve the occupants and visitors of the site as a convenience. As such, the market was included as an amenity to the Community Wellness and Education Center building instead of as a separate, stand-alone use. To represent the proposed land uses, the proposed project analysis was conducted using land use codes *Medical Office Building, General Office Building, Apartments Mid-Rise*, and *Parking Lot* in the CalEEMod model. As noted earlier, the trip generation rates used in CalEEMod assume that the proposed project would generate approximately 2,862 average daily trips. The CalEEMod emissions also assume that the proposed project would include four 900-horsepower diesel back-up generators that would run for approximately 50 hours per year during routine maintenance and testing. The maximum applied water allowance (MAWA) was estimated by the Project Applicant to be approximately 4,397,086 gallons per year, which was also included in CalEEMod. Default assumptions from CalEEMod were used to further estimate project emissions where project-specific information is not available. Operational emissions associated with the proposed project are summarized in Table 4.3.D. **Appendix A** provides the CalEEMod output sheets.

Table 4.3.D: Project Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile Sources	11.6	11.3	97.8	0.2	21.3	5.5
Area Sources	15.1	0.3	34.3	<0.1	<0.1	<0.1
Energy Sources	0.2	3.1	2.0	<0.1	0.2	0.2
Stationary Sources	0.8	3.7	2.1	<0.1	0.1	0.1
Total Project Emissions	**27.7**	**18.4**	**136.2**	**0.2**	**21.6**	**5.8**
SCAQMD Threshold	**55.0**	**55.0**	**550.0**	**150.0**	**150.0**	**55.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA Associates, Inc. (November 2023).
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

As shown in Table 4.3.D, the proposed project would not exceed the significance criteria for daily VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. Impacts would be **less than significant**, and no mitigation is required.

Long-Term Microscale (CO Hot Spot) Analysis. Although the Basin is designated as in attainment/ maintenance for CO, localized CO concentrations are evaluated to determine whether project-related CO impacts would exceed CAAQS or NAAQS. This is because vehicular trips associated with the proposed project could contribute to congestion at intersections and along roadway segments in the project vicinity. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, which is a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited. Under normal meteorological conditions, CO disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthy levels, thereby affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service (LOS) or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate project vicinity are not available. Ambient CO levels monitored at the Lake Elsinore Station, which is the closest monitoring station to the project site, showed a highest recorded 1-hour concentration of 0.9 parts per million (ppm) (the State standard is 20 ppm) and a highest 8-hour concentration of 0.8 ppm (the State standard is 9 ppm) during the past 3 years. The highest CO concentrations would normally occur during peak traffic hours; therefore, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

The proposed project would generate 281 new a.m. peak-hour trips and 252 new p.m. peak-hour trips (**Appendix H**). Given the extremely low level of CO concentrations in the vicinity of the project site and the lack of traffic impacts at any intersections, project-related vehicle emissions are not expected to contribute significantly to CO concentrations or contribute to the result of CO concentrations exceeding the State or federal CO standards. Impacts would **be less than significant**, and mitigation is not required.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

***Less Than Significant Impact*.** Sensitive receptors are people who have an increased sensitivity to air pollution or environmental contaminants. The SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields) as sensitive receptors.

As previously discussed, LSTs are based on the ambient concentrations of a pollutant within the project's SRA and the distance to the nearest sensitive receptor. The nearest sensitive receptor in proximity to the project site are single-family residences immediately west of the project site (the buildings are approximately 30 feet from the project site boundary). For the proposed project, the appropriate SRA for the LST is Perris Valley (SRA 24). While the project site is approximately 19.41 acres, based on the anticipated construction equipment and anticipated grading and ground-disturbing activities, it is assumed that the maximum daily disturbed area for the proposed project would be 5 acres.[19]

By design, the localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions detailed in Table 4.3.E assume all area, stationary, and energy source emissions would occur on site, and 5 percent of the project-related new mobile sources (which is an estimate of the amount of project-related on-site vehicle and truck travel) would occur on site. The 5 percent assumption is conservative because the localized impacts analysis only includes on-site sources, and the majority of vehicle and truck travel would occur off site, thereby resulting in emissions that would also be released off site. The results of the LST analysis for both construction and operation of the proposed project are summarized in Tables 4.3.E and 4.3.F, respectively.

Table 4.3.E: Project Localized Construction Emissions (lbs/day)

Source	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Project Emissions	92.8	66.7	9.7	5.1
Localized Significance Threshold	**270.0**	**1,577.0**	**13.0**	**8.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Compiled by LSA Associates, Inc (November 2023).
Note: Source Receptor Area 24, based on a 5-acre construction disturbance daily area, at a distance of 25 meters (30 feet) from the project site boundary.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size

Table 4.3.F: Project Localized Operational Emissions (lbs/day)

Source	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Project Emissions	7.7	43.3	1.4	0.6
Localized Significance Threshold	**270.0**	**1,577.0**	**4.0**	**2.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Compiled by LSA Associates, Inc (November 2023).
Note: Source Receptor Area 24, 5 acres, 25 meters (30 feet) distance; on site traffic is assumed to be 5% of total.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size

[19] South Coast Air Quality Management District (SCAQMD). n.d. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod- guidance.pdf (accessed June 2023).

As shown in Tables 4.3.E and 4.3.F, the proposed project would not result in an exceedance of a SCAQMD LST during project construction or operation. During construction, construction contractors would be required to implement measures to reduce or eliminate emissions by implementing SCAQMD Rule 403 dust control measures. In addition, the maximum daily emissions associated with project construction emissions that are identified in Table 4.3.C indicate the project would not exceed the significance criteria for VOCs, NO_X, CO, SO_x, PM_{10}, or $PM_{2.5}$ emissions. Therefore, the emissions associated with construction of the proposed project would not be expected to exceed the most stringent applicable federal or State ambient air quality standards. It should be noted that the AAQS were developed to represent levels at which the most susceptible persons (children and the elderly) are protected. In other words, the ambient air quality standards are purposefully set low to protect children, the elderly, and those with existing respiratory problems. Therefore, given the temporary nature of short-term construction impacts, and the absence of any exceeded threshold of significance related to construction impacts, construction of the proposed project would not exceed SCAQMD thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations. No significant health risk would occur from project construction emissions.

Similarly, as indicated in Table 4.3.D, operation of the proposed project would not exceed the significance criteria for VOCs, NO_X, CO, SO_x, PM_{10}, or $PM_{2.5}$ emissions.

The SCAQMD's numeric regional mass daily emissions thresholds are based in part on Section 180(e) of the CAA. It should be noted that the numeric regional mass daily emissions thresholds have not changed since their adoption as part of SCAQMD's *CEQA Air Quality Handbook* published in 1993 (over 20 years ago). The numeric regional mass daily emission thresholds are also intended to provide a means of consistency in significance determination within the environmental review process.

As noted in the Brief of Amicus Curiae by the SCAQMD,[20] the SCAQMD has acknowledged that for criteria pollutants, it would be extremely difficult, if not impossible, to quantify health impacts for various reasons, including modeling limitations as well as where in the atmosphere air pollutants interact and form.

Additionally, the SCAQMD acknowledges that health effects quantification from O_3, as an example, is correlated with the increases in ambient levels of O_3 in the air (concentration) that an individual person breathes. The SCAQMD goes on to state that it would take a large amount of additional emissions to result in a modeled increase in ambient O_3 levels over the entire region. The SCAQMD states that, based on its own modeling in its 2012 AQMP, a reduction of 432 tons (864,000 pounds) per day of NO_X and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce O_3 levels at the highest monitored site by only 9 parts per billion (ppb). As such, the SCAQMD concludes that it is not currently possible to accurately quantify O_3-related health impacts caused by NO_X or VOC emissions from relatively small projects (defined as projects that are not regional in scope) due to photochemistry and regional model limitations (see page 11 of the SCAQMD Brief of Amicus Curiae).

[20] South Coast Air Quality Management District (SCAQMD). 2015. *Amicus Curiae Brief of South Coast Air Quality Management District*. April. Website: https://www.courts.ca.gov/documents/9-s219783-ac-south-coast-air-quality-mgt-dist-041315.pdf (accessed December 2023).

To underscore this point, the SCAQMD goes on to state that it has only been able to correlate potential health outcomes for very large emissions sources. As part of its rulemaking activity, specifically 6,620 pounds per day (lbs/day) of NO_X and 89,180 lbs/day of VOCs were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O_3. As identified in Tables 4.3.C and 4.3.D, NO_X and VOC emissions during project construction and operation would be well below 6,620 lbs/day of NO_X and 89,180 lbs/day of VOCs.

As mentioned above, the proposed project would include four emergency backup diesel generators on site. However, the emergency backup generators are only expected to run a maximum of 50 hours annually during routine maintenance and testing. The closest generator would be placed approximately 231 feet away from the existing sensitive receptors and would be enclosed in 10-foot-high walls. In addition, the emergency diesel generators would be required to comply with SCAQMD requirements. As such, with compliance with SCAQMD requirements and due to the distance of the nearest sensitive receptors and since the emergency backup diesel generators would only be used during maintenance and testing, use of the emergency backup generators would not result in a significant health risk.

Due to the small size of the proposed project in relation to the overall Basin, the level of emissions is not sufficiently high to use a regional modeling program to correlate health effects on a Basin-wide level. On a regional scale, the quantity of emissions from the project is incrementally minor. Because the SCAQMD has not identified any other methods to quantify health impacts from small projects and due to the size of the project, it is speculative to assign any specific health effects to small project-related emissions. However, based on this localized analysis, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the project would not expose sensitive receptors to substantial levels of pollutant concentrations, impacts would be **less than significant**, and mitigation is not required.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

***Less Than Significant Impact*.** Heavy-duty equipment on the project site during construction would emit odors, primarily from equipment exhaust. However, the construction activity would cease after individual construction is completed. No other sources of objectionable odors have been identified for the proposed project during construction.

The proposed project would be required to comply with SCAQMD Rule 402. SCAQMD Rule 402 regarding nuisances states:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Examples of odor-generating projects are wastewater treatment plants, compost facilities, landfills, solid-waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto

body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed project would consist of five public health buildings; therefore, the proposed project would not include land uses that would be expected to generate odors.

Once operational, the proposed project would involve minor odor-generating activities (e.g., trash, barbeque smoke, landscape equipment, application of exterior paints). However, unlike the odor-generating land uses identified above, these are not considered to be potential generators of odor that could affect a substantial number of people. Furthermore, project-generated refuse would be stored in covered containers and would be removed at regular intervals to minimize odors. In addition, the proposed project would be required to comply with the California Department of Resources Recycling and Recovery (CalRecycle) waste diversion program and recycling of solid and organic waste. Therefore, operational uses are not anticipated to emit any objectionable odors. Therefore, the proposed project would not result in other emissions (e.g., those leading to odors) adversely affecting a substantial number of people. Impacts would be **less than significant**, and no mitigation is required.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. 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?	☐	☒	☐	☐
b. 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 U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. 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?	☐	☐	☐	☒
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. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

The analysis in this section is based on the *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report* (MSHCP Consistency and Biology Report) (**Appendix B**) prepared by LSA in August 2023.[21]

4.4.1 Impact Analysis

a. 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?

Less Than Significant with Mitigation Incorporated. As described in the MSHCP Consistency and Biology Report, the project site is currently undeveloped and highly disturbed due to discing. Based

[21] LSA Associates, Inc. 2023. *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report.* August.

on historical aerial imagery, the project site was regularly mowed and/or disced for fire suppression and/or weed control from at least the late 1950s through the present.

As a result of regular discing, the vegetation on the project site consists of nonnative grassland. Two native California fan palm trees were present within the project site. Additionally, several nonnative trees were observed within the project site (e.g., Peruvian pepper tree, olive, and Chinese elm). Dominant plant species include Russian thistle (*Salsola tragus*), common Mediterranean grass (*Schismus barbatus*), ripgut brome (*Bromus diandrus*), and London rocket (*Sisymbrium irio*).

As described above, the project site does not contain any native habitat. Despite this, it provides suitable habitat for burrowing owl (*Athene cunicularia*) in the form of sparse, ruderal vegetation. Burrowing owl is found in open, dry grasslands, agricultural and rangelands, and desert habitats often associated with burrowing animals. It can also inhabit grass, forb, and shrub stages of pinyon and ponderosa pine habitats. It nests in abandoned burrows of ground squirrels or other animals, in pipes, under piles of rock or debris, and in other similar features. In addition, the project site is within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) survey area for burrowing owl. Focused burrowing owl surveys were conducted during the appropriate breeding season for this species (March 1–August 31). Four surveys were conducted from July 12 to August 4, 2023. The surveys were conducted by walking approximately 30-meter-wide transects throughout areas of suitable habitat to look for burrowing owls, potential burrows (burrows greater than 11 centimeters in diameter and 150 centimeters deep), and signs of burrowing owls. Burrows encountered during the survey were examined for owl sign (e.g., feathers, pellets, whitewash, and prey remnants). However, the one burrow detected during the survey contained no burrowing owl or their sign. Therefore, no suitable burrowing owl burrows were observed during the focused surveys. Even though the focused burrowing owl surveys indicated the burrowing owl is currently absent from the site and habitat on the site is poor and isolated, there is a possibility that burrowing owl could visit the site from better habitat in the vicinity, or that conditions on the site could improve and burrowing owl could subsequently occupy the site. Therefore, impacts to burrowing owls could be significant without mitigation incorporated. As such, a measure requiring a preconstruction survey within 30 days prior to the beginning of project-related ground disturbance would ensure avoidance of any potential impact to burrowing owls. If burrowing owl is found during the preconstruction survey, the project proponent would need to inform the California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) immediately prior to initiating ground disturbance.

As specified in **Mitigation Measure (MM) BIO-1**, impacts will be avoided through pre-construction surveys and avoidance or relocation if active burrows are located. With implementation of MM BIO-1, impacts to burrowing owl would be reduced to a less than significant level, and no additional mitigation is required.

MM BIO-1 Since suitable habitat is present, a pre-construction survey for burrowing owl will be required within 30 days prior to any ground-disturbing activities to avoid take of burrowing owls and occupied burrowing owl nests (MSHCP Species Specific Objective 6). If survey results are negative for burrowing owls during the 30 day preconstruction survey, project activities can proceed.

If survey results are positive and burrowing owl is found within the project site, the project proponent will need to inform the California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) immediately. An experienced biologist will need to verify if any burrowing owls within the project site are breeding or wintering, and a non-disturbance buffer no less than 500 feet will be implemented and centered on the burrow(s) utilized. Burrowing owls should be allowed to leave the project site on their own accord if possible. Additional avoidance and minimization measures are not anticipated to be required by the wildlife resource agencies if non-disturbance buffers are maintained and burrowing owl are allowed to leave on their own accord. If burrowing owls cannot be avoided, a Determination of Biologically Equivalent or Superior Preservation (DBESP) will need to be prepared and submitted to the CDFW and USFWS for approval prior to ground-disturbing activities. Additionally, a Burrowing Owl Protection and Relocation Plan will need to be prepared detailing passive (e.g., use of one-way doors and collapse of burrows) and/or active (e.g., capturing owls, relocating to a new site, and collapse of burrows) relocation methods. The Burrowing Owl Protection and Relocation Plan will need to be submitted to the CDFW and USFWS for approval prior to initiating ground disturbance within the project site. Take of active burrowing owl nests shall be avoided during the nesting season (March 1–August 31). If burrowing owls are observed within the project site at any time during project activities, the wildlife agencies shall be notified immediately. Additional avoidance and minimization measures could be required by the wildlife resource agencies during the notification/document review process (e.g., exclusionary buffers, monitoring, or implementation of appropriate mitigation strategy).

b. 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 U.S. Fish and Wildlife Service?

No Impact. As described in the MSHCP Consistency and Biology Report, the project site is highly disturbed and currently undeveloped. There are no natural streams or riparian habitat on the project site. As described in the MSHCP Consistency and Biology Report, the project site was assessed for riparian/riverine areas at the time of the August 4, 2023, site visit. The assessment included identification and mapping of plant communities on the site as well as any drainage features. The assessment also included a review of seasonally appropriate aerial photographs from Google Earth.

There are no drainage features or riparian vegetation on the project site; therefore, there are no areas that would meet the MSHCP definition of riparian/riverine areas.

No vernal pools were observed on the site. Low-lying areas that occur on site did not show signs of ponding or surface water and lacked hydrophytic vegetation. The soil mapped and observed on the site is sandy loam, which is unlikely to support ponding sufficient for vernal pool formation. No areas containing surface water were observed on historical aerial imagery.

As noted above, there are no vernal pools or low-lying areas that may function as vernal pools or depressions that hold water long enough to eliminate upland vegetation on the project site. No

inundation on the site was seen in seasonally appropriate aerial photographs, and the sandy loam soil is porous and unsuitable for ponding of sufficient duration to provide habitat suitable for sensitive fairy shrimp species. Given these factors, the site does not contain suitable habitat for sensitive fairy shrimp species.

According to the MSHCP Consistency and Biology Report, the project site is within MSHCP Criteria Area #2529. However, conservation of the project site is not warranted because it is located entirely within the eastern portion of Criteria Cell #2529, which is not within the portion of its respective criteria area cell that is targeted for conservation. Furthermore, although the land is owned by the County of Riverside (County), it is not within or adjacent to public/quasi-public lands that consist of national forest, State parks, County parks, nature reserves, and Bureau of Land Management (BLM) Lands.

No riparian habitat or sensitive natural communities, as identified in local or regional plans, policies, or regulations by the CDFW or the USFWS, exist on the project site. Therefore, development of the proposed project would not impact any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. No mitigation is required.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. As described in the MSHCP Consistency and Biology Report, the project site is highly disturbed and currently undeveloped. No vernal pools were observed on the site. Low-lying areas that occur on site did not show signs of ponding or surface water and lacked hydrophytic vegetation. The soil mapped and observed on the site is sandy loam, which is unlikely to support ponding sufficient for vernal pool formation. No areas containing surface water were observed on historical aerial imagery.

As noted above, there are no vernal pools or low-lying areas that may function as vernal pools or depressions that hold water long enough to eliminate upland vegetation on the project site. No inundation on the site was seen in seasonally appropriate aerial photographs, and the sandy loam soil is porous and unsuitable for ponding of sufficient duration to provide habitat suitable for sensitive fairy shrimp species. Given these factors, the site does not contain suitable habitat for sensitive fairy shrimp species.

Habitat suitability for riparian birds, including the least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), and yellow-billed cuckoo (*Coccyzus americanus*), was assessed in conjunction with the assessment for riverine/riparian areas. Riparian/riverine and/or any habitat suitable for riparian bird habitat is absent from the project site. Because no riparian/riverine and/or any habitat suitable for riparian birds is present on the project site, no surveys for riparian birds were required. Therefore, development of the proposed project would not impact any riparian birds and no mitigation is required.

The project does not contain any federally protected wetlands or jurisdictional drainage features as defined by Section 404 of the Clean Water Act. Therefore, development of the proposed project would have no impact on federally protected wetlands, and no mitigation is required.

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?

Less Than Significant with Mitigation Incorporated. As described in the MSHCP Consistency and Biology Report, the project site and surrounding area do not contain any open bodies of water that could support aquatic species. Due to the highly disturbed nature of the site and the surrounding area, it is unlikely that the project site functions as a wildlife linkage or migratory wildlife corridor. However, the few existing native and nonnative trees (California fan palm, Peruvian pepper tree, olive, and Chinese elm) on the project site may provide habitat suitable for nesting migratory birds. All of the existing on-site ornamental trees would be removed during construction. Therefore, project implementation has the potential to impact active bird nests if vegetation and trees are removed during the nesting season. This tree removal could result in a potentially significant impact if nesting birds are present in the trees at the time of removal. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) (Title 33, United States Code [USC], Section 703 et seq., see also Title 50, Code of Federal Regulations [CFR], Part 10) and Section 3503 of the California Fish and Game Code. Therefore, implementation of the proposed project would be subject to the provisions of the MBTA, which prohibits disturbing or destroying active nests. Project implementation must be accomplished in a manner that avoids impacts to active nests during the breeding season. Therefore, if project construction occurs between February 1 and August 31, impacts may be significant. As such, a qualified biologist shall conduct a nesting bird survey prior to ground- and/or vegetation-disturbing activities to confirm the absence of nesting birds. As specified in MM BIO-2, avoidance of impacts would occur through a variety of means, including establishing suitable buffers around any active nests. With implementation of MM BIO-2, impacts to nesting birds would be reduced to less than significant, and no additional mitigation is required.

MM BIO-2 **Nesting Bird Surveys.** In the event that vegetation removal takes place during the bird-nesting season (i.e., February 1–August 31), a qualified biologist shall conduct a nesting bird survey within 3 days prior to any construction activities beginning to ensure that birds are not engaged in active nesting within and around the project site. If nesting birds are discovered during preconstruction surveys, the biologist shall identify an appropriate buffer (i.e., up to 500 feet depending on the circumstances and specific bird species) within which no construction activities or other disturbances are allowed to occur until after the birds have fledged from the nest. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The results of the survey shall be documented and filed with the Environmental Permitting Department prior to construction.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. The Riverside County General Plan and development ordinances include regulations or policies governing biological resources (e.g., preservation of historic or landmark trees).

Riverside County's Oak Tree Management Guidelines, County Ordinance No. 559, and General Plan Policies Open Space (OS) 9.3 and 9.4 regulate tree removal. The County of Riverside's Oak Tree Management Guidelines contain details for properties that contain oak trees. However, as no oak trees occur on site, these guidelines do not apply to the project site.

According to the County of Riverside Ordinance No. 559, the removal of native trees located in an area above 5,000 feet in elevation and within the unincorporated area of Riverside County is not allowed without a permit. However, the site elevation ranges from 1,509 feet to 1,542 feet above mean sea level; therefore, this ordinance does not apply.

Additionally, Riverside County General Plan Policy OS 9.3 aims to maintain and conserve superior examples of native trees, natural vegetation, stands of established trees, and other features for ecosystem, aesthetic, and water conservation purposes while Riverside County General Plan Policy OS 9.4 aims to conserve the oak tree resources in the county, similar to Riverside County's Oak Tree Management Guidelines.

As noted in the MSHCP Consistency Analysis and Biology Report prepared for the project, the project site is highly disturbed due to discing. Based on historical aerial imagery, the project site was regularly mowed and/or disced from at least the late 1950s through the present. As a result of regular discing, the vegetation on the project site consists of nonnative grassland and is considered ruderal. Two native California fan palm trees are present within the project site. Additionally, several nonnative trees were observed within the project site (e.g., Peruvian pepper tree, olive, and Chinese elm). Dominant plant species include Russian thistle, common Mediterranean grass, ripgut brome, and London rocket.

The project anticipates the removal of the two native California fan palms; however, the removal of these two trees would not conflict with Riverside County's General Plan Policy OS 9.3 because, as noted above, the two individual trees are surrounded by ruderal vegetation. Furthermore, there is not a continuous stand of trees that the palm trees are associated with, and the project site does not provide a long-term conservation value for the palm trees. The two trees are ornamental in the landscape they occur in and are also not native to the habitat they occur in. Therefore, because the palm trees are not superior examples of native trees, and the existing trees are not designated as historic or landmark trees, the proposed project would result in a less than significant impact related to local policies or ordinances protecting biological resources, and no mitigation is required.

f. 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?

Less Than Significant Impact. The County is a participant in the MSHCP. Section 10(a)(2)(A) of the 1973 Federal Endangered Species Act (FESA) requires the preparation of a Habitat Conservation Plan (HCP) for incidental take of threatened or endangered species when there is no federal agency involvement in a project. Continuing land development may cause incidental take of listed species; therefore, HCPs have been prepared for areas within Western Riverside County. The MSHCP and the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) are the principal HCPs in Western Riverside County.

The MSHCP is a comprehensive, multijurisdictional habitat conservation plan focusing on conserving species and their associated habitats in Western Riverside County. The MSHCP is one of several large, multijurisdictional habitat-planning efforts in southern California, with the overall goal of maintaining biological and ecological diversity within a rapidly urbanizing region. The MSHCP allows Riverside County and the cities within the county to better control local land use decisions and maintain a strong economic climate in the region while addressing the FESA and California Endangered Species Act (CESA). Project compliance and consistency with the MSHCP ensure that any cumulative impacts to covered species are effectively mitigated. Special-status species that are not covered by the MSHCP also benefit from the surveys, conservation, and other measures of the MSHCP because they occupy many of the same habitats.

The project site is within the MSHCP area and the SKR HCP fee area; however, it is not within a Stephens' kangaroo rat (SKR) reserve. Therefore, focused surveys for SKR will not be required for this project, and payment of the appropriate SKR HCP fee would be required as a matter of law.[22] Additionally, the project will be required to pay MSHCP Local Development Mitigation Fees. Payment of MSHCP Local Development Mitigation Fees provides habitat-based mitigation within the plan area for all wildlife and plant species impacted due to the loss of suitable habitat from covered projects.[23] The proposed project would not conflict with local ordinances or the adopted MSHCP as described in the MSHCP Consistency and Biology Report or the SKR HCP. The project would be consistent with the goals/objectives of the MSHCP with implementation of the proposed mitigation measures listed above. Therefore, the proposed project would result in less than significant impacts related to local ordinances and the adopted MSHCP and SKR HCP, and no mitigation is required.

[22] Riverside County Habitat Conservation Authority. n.d. Stephens' Kangaroo Rat Mitigation Fee. Website: https://www.rchca.us/185/Stephens-Kangaroo-Rat-Mitigation-Fee (accessed November 10, 2023).

[23] Western Riverside County Regional Conservation Authority. n.d. MSHCP Mitigation Fee Implementation Manual. Website: https://www.wrc-rca.org/wp-content/uploads/2023/02/MSHCP_Mitigation_Fee_Implementation_Manual_February_2023.pdf (accessed November 10, 2023).

4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

This section is based on the Cultural Resources Assessment [24] prepared by LSA in December 2023, which is provided in **Appendix C**. The Cultural Resources Assessment included review of data from a cultural resources records search from the Eastern Information Center (EIC), additional review of historic-period maps and online aerial photographs, and a field study performed on September 8, 2023, by qualified LSA archaeologists. The objectives of this research were to: (1) establish the status and extent of previously recorded cultural resource sites, surveys, and studies in the surrounding area; (2) note the likelihood of encountering cultural resources and their type(s) based on previously recorded resources within 1 mile of the project site; and (3) uncover relevant historical contexts. Data sources consulted at the EIC include archaeological site records and reports from previous studies.

4.5.1 Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. Pursuant to §15064.5, the term "historical resource" shall include:

(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 [California Register] (Pub. Res. Code §5024.1, Title 14 California Code of Regulations [CCR], Section 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 of 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,

[24] LSA Associates, Inc. 2023. *Cultural Resources Assessment, Riverside County Behavioral Health Campus Project, Vicinity of Perris, Riverside County, California.* December.

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.

D. Has yielded, or may be likely to yield, information important in prehistory or history.

A "substantial adverse change" to a historical resource, according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

As detailed in the Cultural Resources Assessment (provided in **Appendix C**), data from the Eastern Information Center (EIC) indicated 41 cultural resource studies have been conducted within a 1-mile radius, 4 of which included portions or the entirety of the project site. Although no resources were documented within the project site, at least 72 resources were recorded within 1 mile, including 61 prehistoric resources, 1 multi-component site, 4 historic-period archaeological resources, and 6 built environment properties. The nearest resource is a bedrock milling site located approximately 900 feet west of the project site.

Review of historic topographic maps and aerial photographs as part of the Cultural Resources Assessment indicated that 1940s–1950s era buildings, associated features, and some landscaping were removed from the project site sometime between 2012 and 2014.

Visibility at the project site during the September 8, 2023, field study was poor (approximately 15 percent) and obstructed by dense xeric vegetation. However, some paths for vehicle access around the perimeter of the site and three paths traversing the parcel were cleared. The project site has been moderately to severely disturbed by agricultural and vegetation abatement activities. Fire damage (charring) was noted on two established palm trees in the southwest corner of the project site. Soils are silty alluvium. The following is a summary of the one resource identified within the project site during the survey.

- **33-029857 (LSA-PMB2201A-S-1):** This resource consists of a concrete foundation footing, an abandoned well, and landscaping trees (see Department of Parks and Recreation [DPR] Site Record in **Appendix C** for details).

The California Register of Historical Resources (California Register), which is based upon and parallel to the National Register of Historic Places (National Register), is a listing of sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

1. Are associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; or

2. Are associated with the lives of persons important in our past; or

3. Embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values; or

4. Have yielded, or may be likely to yield, information important in prehistory or history.

To determine whether a resource meets the definition of a "historical resource" pursuant to CEQA, an evaluation of eligibility for listing in the California Register is required. To be eligible for listing in the California Register, a resource must meet at least one of the four California Register criteria listed above for significance and possess integrity of location, design, setting, materials, workmanship, feeling, and association. To qualify as a "unique archaeological resource," it also must meet one of the four associated criteria above.

Although dating to the historic period and peripherally associated with the rural-agricultural development of the Perris Valley, this resource within the project site is a typical example of a common/ubiquitous resource type: mid-20th century foundations/features with no associated artifacts or indication of subsurface deposits. No specific association with significant events or persons could be determined. The sites themselves do not represent a particular type, period, or method of construction. In addition, the resources do not contain information needed to answer important research questions in which there is public interest, have a special and particular quality, or are directly associated with a scientifically recognized important historic event or person under CEQA. Therefore, the project site is not eligible for listing in the California Register and is not included in a local register. In addition, no resource included in a local register of historical resources, as defined in PRC §5020.1(k), or identified as significant in an historical resource survey meeting the requirements of PRC §5024.1(g), or any object, building, structure, site, area, place, record, or manuscript that 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 was recorded on the project site or in the surrounding area. Therefore, implementation of the proposed project would not cause a substantial adverse change in the significance of a historic resource. **No impact** would occur, and no mitigation is required.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant with Mitigation Incorporated. Pursuant to §15064.5, CEQA applies to effects on archaeological sites. When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in Response 3.15(a) above. If a lead

agency determines that the archaeological site is an historical resource, it shall adhere to the provisions of PRC Section 21084.1 and Section 15126.4 of the *State CEQA Guidelines*, and then the limits contained in PRC Section 21083.2 do not apply. If an archaeological site does not meet the criteria as a historical resource, but does meet the definition of a unique archeological resource in PRC Section 21083.2, the site shall be treated in accordance with the provisions of Section 21083.2. If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.

A "unique archeological resource", pursuant to PRC Section 21083.2, is defined as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.

3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Cultural resource record searches, additional research, and a field survey were conducted for the project site. On September 8, 2023, LSA archaeologists conducted a reconnaissance pedestrian survey of the project site. The entire project site was surveyed in systematic parallel transects spaced approximately 10 meters (approximately 33 feet) apart. The purpose of this survey was to identify and document any cultural resources that might be exposed and locate areas within the project site that might be sensitive for cultural resources prior to the beginning of ground-disturbing activities.

As discussed in Section 4.7, Geology and Soils, the project site is underlain by Very Old Alluvial Fan Deposits and Artificial Fill. Artificial Fill consists of sediments that have been removed from one location and transported to another location by human activity rather than by natural means. In some instances, the Artificial Fill may consist of re-worked native sediment within a project site, while in others, the material may have been transported many miles, and composition is dependent on the source and purpose. This previously disturbed soil is considered to have a low archaeological sensitivity. The Very Old Alluvial Fan Deposits below the artificial fill formed during the middle to early Pleistocene (129,000 years ago to 2.58 million years ago [Ma]) from sediment carried by rivers and streams down the mountains. As native sediment, the Very Old Alluvial Fan Deposits could contain previously undiscovered unique archaeological resources. With a maximum depth of 25 feet, excavation for the proposed project is expected to extend into the Very Old Alluvial Fan Deposits and could uncover previously undiscovered unique archaeological resources. However, it should be noted that the project site has been routinely disturbed through weed abatement practices (e.g., discing) that could reduce the project site's archaeological sensitivity and the likelihood of previously undocumented cultural resources being uncovered at the site.

Although no resources were previously documented within the project site, a historic period site (i.e., concrete foundation footing, an abandoned well, and landscaping trees) was identified within

the project site and upon evaluation was determined to be neither a "historical resource" nor a "unique archaeological resource" under CEQA. Although no prehistoric sites are recorded or were identified on the project site, the surrounding area contains 60 identified prehistoric resources, including ceremonial and habitation sites. Therefore, due to the density of prehistoric cultural resources in the vicinity of the project site, there is potential that excavation related to development of the project site may result in a significant impact to cultural resources if unique archaeological resources are uncovered.

Mitigation Measures. Implementation of **MM CUL-1**, which requires archaeological monitoring during earthmoving activities, would reduce potential impacts on previously undocumented archaeological resources during construction. In addition, **MM TCR-1 through MM TCR-6** and **MM TCR-9,** as detailed in Section 4.18, Tribal Cultural Resources, would require a pre-grading meeting with the County, project archaeologist, and Consulting Tribe(s), tribal monitoring during ground-disturbing activities, the preparation of the Cultural Resource Monitoring Plan (CRMP), and detailed procedures for when unanticipated unique archaeological resources are inadvertently discovered during construction. **MM TCR-1 through MM TCR-6** and **MM TCR-9**, which were developed during tribal consultation, would further ensure that potential impacts to previously undocumented archaeological resources would be **less than significant**.

MM CUL-1 In the event previously undocumented archaeological resources are identified during earthmoving activities, further work in the area (within a 100-foot buffer) should be halted until a qualified archaeologist has assessed the nature of the find(s) and has determined the appropriate treatment.

c. Would the project disturb any humans remains, including those interred outside of formal cemeteries?

Less Than Significant with Mitigation Incorporated. No known human remains are present on the project site, and there are no facts or evidence that Native Americans or people of European descent are buried on the project site. However, as described previously, due to the density of prehistoric cultural resources in the vicinity of the project site, buried and undiscovered archaeological remains, including human remains, have the potential to be present below the ground surface in portions of the project site. In addition, as native sediment, the Very Old Alluvial Fan Deposits could contain previously undiscovered cultural resources, including human remains. With a maximum depth of 25 feet, excavation for the proposed project is expected to extend into the Very Old Alluvial Fan Deposits and could uncover previously undiscovered cultural resources, including human remains.

Discovery of human remains would trigger the requirements in the State's Health and Safety Code, and if not handled properly could destroy the resource. In the unlikely event that human remains are encountered during project grading, the proper authorities would be notified, and standard procedures for the respectful handling of human remains during the earthmoving activities would be adhered to, including determining if the human remains are Native American. Construction contractors are required to adhere to CCR Section 15064.5(e), PRC Section 5097.98, and Section 7050.5 of the State's Health and Safety Code. CCR Section 15064.5(e) and Section 7050.5 of the State's Health and Safety Code require that in the event of an unanticipated discovery of human remains, there shall be no further excavation or disturbance of the site, or any nearby area

reasonably suspected to overlie adjacent human remains, until the County Coroner is contacted to determine that no investigation of the cause of death is required. As required by CCR Section 15064.5(e), PRC Section 5097.98, and Section 7050.5 of the State's Health and Safety Code, if the County Coroner determines the remains are Native American, the County Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the Most Likely Descendant (MLD). The MLD may make recommendations to the landowners for means of treatment of the remains.

The contractor, Project Applicant, and County Coroner are required to comply with the provisions of CCR Section 15064.5(e), PRC Section 5097.98, and Section 7050.5 of the State's Health and Safety Code. Compliance with these provisions, as specified in **Regulatory Compliance Measure (RCM) CUL-1** below, would ensure that any potential impacts to unknown buried human remains would be less than significant by ensuring appropriate examination, treatment, and protection of human remains as required by State law. In addition, **MM TCR-7** and **MM TCR-9**, as detailed in Section 4.18, Tribal Cultural Resources, provide procedures if human remains are determined to be Native American, including ensuring that the site of any reburial of Native American human remains or associated grave goods shall not be disclosed.

Mitigation Measures. In addition to **RCM CUL-1,** which is a standard condition based on State law related to the discovery of human remains and is applicable to the proposed project, implementation of **MM TCR-7** and **MM TCR-9**, as detailed in Section 4.18, Tribal Cultural Resources, would ensure that impacts related to unknown buried human remains would be **less than significant**.

RCM CUL-1 **Human Remains.** In the event that human remains are encountered on the project site, work within 100 feet of the discovery shall be redirected and the County of Riverside (County) Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the County shall consult with the MLD as identified by the NAHC and use commercially reasonable efforts to reach agreement upon a plan for treatment and protection or disposition of the remains. Prior to the issuance of grading permits, the County shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.

4.6 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

The project site is within the service territory of Southern California Edison (SCE). SCE provides electricity to more than 15 million people in a 50,000-square-mile area of Central, Coastal, and Southern California.[25] According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2022 was 85,870 gigawatt-hours (GWh) (31,604 GWh for the residential sector and 54,266 GWh for the non-residential sector). Total electricity consumption in Riverside County in 2022 was 17,780 GWh (17,780,573,271 kilowatt-hours [kWh]).[26,27]

The Southern California Gas Company (SoCalGas) is the natural gas service provider for the project site. SoCalGas provides natural gas to approximately 21.8 million people in a 24,000-square-mile service area throughout Central and Southern California, from Visalia to the Mexican border.[28] According to the CEC, total natural gas consumption in the SoCalGas service area in 2022 was 5,026 million therms (2,230 million therms for the residential sector). Total natural gas consumption in Riverside County in 2022 was 431 million therms (431,052,392 therms).[29,30]

Gasoline is the most used transportation fuel in California, with 97 percent of all gasoline being consumed by light-duty cars, pickup trucks, and sport utility vehicles. In 2021, total gasoline consumption in California was 289,918 thousand barrels (12.2 billion gallons) or 1,464.7 trillion British thermal units (BTU).[31] Of the total gasoline consumption, 273,289 thousand barrels

25 Southern California Edison (SCE). 2020. About Us. Website: https://www.sce.com/about-us/who-we-are (accessed November 2023).

26 California Energy Commission (CEC). 2020a. Electricity Consumption by County. Website: http://www.ecdms.energy.ca.gov/elecbycounty.aspx (accessed November 2023).

27 California Energy Commission (CEC). 2020b. Electricity Consumption by Entity. Website: http://www.ecdms.energy.ca.gov/elecbyutil.aspx. (accessed November 2023).

28 Southern California Gas Company (SoCalGas). 2020a. About SoCalGas. Website: https://www.socalgas.com/about-us/company-profile (accessed November 2023).

29 California Energy Commission (CEC). 2020c. Gas Consumption by County. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed November 2023).

30 California Energy Commission (CEC). 2020d. Gas Consumption by Entity. Website: http://www.ecdms.energy.ca.gov/gasbyutil.aspx (accessed November 2023).

31 United States Energy Information Administration (EIA). 2022b. California State Profile and Energy Estimates, Data. Website: www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=CA (accessed November 2023).

(11.5 billion gallons) or 1,380.7 trillion BTU were consumed for transportation.[32] Based on fuel consumption data obtained from the CARB California Emissions Factor Model, Version 2021 (EMFAC2021), approximately 755.0 million gallons of gasoline and approximately 299.1 million gallons of diesel are anticipated to be consumed from vehicle trips in Riverside County in 2023.

4.6.1 Impact Analysis

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

Less Than Significant Impact. The proposed project would increase the demand for electricity, natural gas, and fuel usage when compared to existing site conditions, which do not currently generate any demand for these energy sources. The discussion and analysis provided below is based on the data included in the CalEEMod output for the project, which is included in **Appendix A**.[33]

Construction-Period Energy Use. The anticipated construction schedule assumes that the proposed project would be built over approximately 31 months. The proposed project would require site preparation, grading, utility trenching, ground improvement, building construction, paving, and architectural coating during construction.

Construction of the proposed project would require energy for the manufacture and transportation of building materials and construction workers and for preparation of the site for grading activities and building construction. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. Construction equipment would not utilize natural gas and would not run on electricity. Therefore, the analysis of energy use during construction focuses on fuel consumption. Construction trucks and vendor trucks hauling materials to and from the project site would be anticipated to use diesel fuel, whereas construction workers traveling to and from the project site would be anticipated to use gasoline-powered vehicles. Fuel consumption from transportation uses depends on the type and number of trips, vehicle miles traveled (VMT), the fuel efficiency of the vehicles, and the travel mode. Construction activities would involve the use of standard construction material that is similar to other developments in the region. No unusual project characteristics would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the State.

In addition, construction activities are not anticipated to result in an inefficient use of energy because gasoline and diesel fuel would be supplied by construction contractors who would conserve

[32] United States Energy Information Administration (EIA). 2022b. California State Profile and Energy Estimates, Data. Website: www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=CA (accessed November 2023).

[33] The CalEEMod analysis evaluated project construction emissions with a start date of January 3, 2024, and a duration of 24 months. The proposed project's construction schedule has since been modified such that project construction would occur over a 31-month duration with a start date of June 3, 2024. This minimal modification to the project construction schedule was reviewed by LSA and it was determined that the modified construction duration would not result in any more severe air quality or greenhouse gas impacts than what is described within.

the use of their supplies to minimize their costs on the project. In addition, the proposed project would utilize construction equipment with Tier 2 or better, which would ensure fuel efficiency. The project would also not cause or result in the need for additional energy facilities or an additional or expanded delivery system. For these reasons, fuel consumption during construction would not be inefficient, wasteful, or unnecessary. Therefore, construction energy impacts would be **less than significant**, and no mitigation would be required.

Operational Energy Use. Energy use includes both direct and indirect sources of emissions. Direct sources of emissions include building energy used on site such as natural gas usage for heating, while indirect sources include electricity generated by off-site power plants. The proposed project would also result in operational energy usage associated with gasoline consumed by project-related vehicle trips. The proposed project would also result in diesel usage associated with the four emergency backup on-site diesel generators; however, the diesel generators are only expected to run approximately 50 hours per year each during routine testing and maintenance. Therefore, use of the diesel generators is not expected to substantially increase diesel fuel usage and is not evaluated further.

Building Energy Use. The proposed project would be designed to meet Leadership in Energy and Environmental Design – New Construction (LEED-NC) v4 Silver Standards and include a number of sustainability features that would reduce building energy use, such as spectrally selective low-e glazing on windows to reduce solar heat gain, roofing solar reflectance indices (SRIs) that would exceed code requirements, and solar photovoltaic arrays, as further described in Chapter 2.0, Project Description. The proposed buildings would be constructed using the 2022 Title 24 standards. The 2022 Title 24 Building Energy Efficiency Standards (Title 24 Standards) include requirements in the Energy Code (Title 24, Part 6) and voluntary energy efficiency provisions in Title 24, Part 11 of the California Green Building Standards Code (CALGreen Code). The CALGreen Code addresses energy efficiency, water conservation, materials conservation, planning and design, and overall environmental quality. The CALGreen Code is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective on January 1, 2023. Title 24 standards contain energy efficiency requirements for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. The Title 24 Standards establish performance metrics in the form of an “energy budget” based on energy consumption per square foot of floor space. For this reason, the Title 24 Standards include both a prescriptive option (which allows builders to comply by using methods known to be efficient) and a performance option (which allows builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option). The Title 24 Standards contain data and various compliance tools to help builders achieve compliance.

Table 4.6.A shows the estimated potential increase in electricity, natural gas, gasoline, and diesel demand associated with the proposed project. The estimated electricity use is from the CalEEMod analysis, while the gasoline and diesel rates are based on the project’s Traffic Impact Analysis (see

Appendix H) in conjunction with United States Department of Transportation (DOT) fuel efficiency data.[34] CalEEMod and fuel consumption data are included in **Appendix A**.

Table 4.6.A: Estimated Annual Energy Use by the Proposed Project

Land Use	Electricity Use (kWh/yr)	Natural Gas Use (therms/yr)	Gasoline (gal/yr)	Diesel (gal/yr)
Proposed Project	6,430,037	117,205	380,178	272,817

Source: Compiled by LSA Associates, Inc. (November 2023).
gal/yr = gallons per year
kWh/yr = kilowatt-hours per year
therms/yr = therms per year

Electricity. Electricity use in CalEEMod is measured in kilowatt-hours per year. CalEEMod divides building electricity use into uses that are subject to Title 24 standards and those that are not. For electricity, Title 24 uses include the major building envelope systems covered by Part 6 (California Energy Code) of Title 24 (e.g., space heating, space cooling, water heating, and ventilation). Non-Title 24 uses include all other end uses (e.g., appliances, electronics, and other miscellaneous plug-in uses). Because some lighting is not considered as part of the building envelope energy budget, CalEEMod considers lighting as a separate electricity use category.

As shown in Table 4.6.A, the estimated potential increase in electricity demand associated with the proposed project is 6,430,037 kWh per year. Total electricity consumption in Riverside County in 2022 was 17,780 GWh (17,780,573,271 kWh). Therefore, electricity demand associated with the proposed project would be approximately 0.04 percent of Riverside County's total electricity demand. As such, the increase in electricity demand associated with the proposed project would be relatively small in comparison to Riverside County's overall use of the State's available electricity resources. In addition, the proposed project electricity consumption will be in line with other similar developments in the region and therefore would not be considered wasteful, inefficient, or unnecessary.

Natural Gas. Natural gas use in CalEEMod is measured in units of a thousand British thermal units (kBTU) per year; however, this analysis converts the results to natural gas in units of therms. For natural gas, uses are categorized as Title 24 or non-Title 24. Title 24 uses include building heating and hot water end uses. Non-Title 24 natural gas uses include appliances. As shown in Table 4.6.A, the estimated potential increase in natural gas demand associated with the proposed project is 117,205 therms per year. Total natural gas consumption in Riverside County in 2021 was 431 million therms (431,052,392 therms). Therefore, operation of the proposed project would increase the annual natural gas consumption in Riverside County by approximately 0.03 percent. As such, the increase in natural gas demand associated with the proposed project would be relatively small in comparison to Riverside County's overall use of the State's available natural gas resources. In addition, the proposed project natural gas

[34] United States Department of Transportation (DOT). 2021. Average Fuel Efficiency of U.S. Light Duty Vehicles. Website: www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles (accessed June 2023).

consumption will be in line with other similar developments in the region and therefore would not be considered wasteful, inefficient, or unnecessary.

Summary of Building Energy Use Impacts. Although there would be an overall increase in energy demand resulting from the proposed project, the project would be required to adhere to all federal, State, and local requirements for energy efficiency, including current CCR Title 24 and CALGreen Code standards, which establish minimum efficiency standards related to various building features, including appliances, water and space heating/cooling equipment, building insulation and roofing, and lighting that would reduce energy usage.

In addition, the proposed project would be constructed using energy efficient modern building materials and construction practices, and the proposed project also would use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (CCR Title 20, Sections 1601 through 1608).

The proposed project would also be LEED certified and would meet the LEED-NC v4 Silver Standards. Furthermore, the proposed buildings' roofing SRIs would exceed code requirements so that the roofs return the majority of solar energy to the atmosphere rather than allowing it to enter the structures. Plumbing fixtures would be selected to reduce restroom water use and water heating energy by implementing WaterSense-labeled fixtures. Further, residential clothes washers and dishwashers will be EnergyStar certified.

As described in Chapter 2.0, Project Description, the energy cost of the proposed project was modeled using American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2010 and indicated that the proposed project is anticipated to exceed ASHRAE 90.1-2010 standards. In addition, a 335 kW to 600 kW solar photovoltaic array would be incorporated via carports, which is anticipated to offset a minimum of 12 percent of the energy used by the buildings, for an overall energy cost reduction of 38 percent below the ASHRAE 90.1-2010 energy standard. The proposed buildings and solar photovoltaic arrays would be commissioned to ensure that they meet the design intent, and exterior light fixtures will be chosen to minimize light pollution.

In addition, as discussed above, SCE is the private utility that would supply the proposed project's electricity services. SCE is positioned to meet the State's 60 percent goal for renewable energy by 2030 and the 100 percent goal for achieving carbon neutrality by 2045 mandate set forth in Senate Bill (SB) 100. In addition, SCE plans to continue to provide reliable service to their customers and upgrade their distribution systems as necessary to meet future demand.

Therefore, building energy usage associated with the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy.

Fuel Consumption. The proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. The average fuel economy for light-duty vehicles (automobiles, pickups, vans, and sport utility vehicles) in the United States has steadily increased, from about 14.9

miles per gallon (mpg) in 1980 to 22.9 mpg in 2020.[35] The average fuel economy for heavy-duty trucks in the United States has also steadily increased, from 5.7 mpg in 2013 to a projected 8.0 mpg in 2021.[36]

Using the EPA gasoline fuel economy estimates for 2019, the California diesel fuel economy estimates for 2021, and the traffic data from the project traffic analyses, the proposed project is estimated to result in the annual consumption of 380,178 gallons of gasoline and 272,817 gallons of diesel fuel, as shown in Table 4.6.A. This analysis conservatively assumes that all vehicle trips generated as a result of project operation would be new to Riverside County. Based on fuel consumption data obtained from EMFAC2021, approximately 755.0 million gallons of gasoline and approximately 299.1 million gallons of diesel are estimated to be consumed from vehicle trips in Riverside County in 2023. Therefore, vehicle trips associated with the proposed project would increase the annual fuel use in Riverside County by approximately 0.05 percent for gasoline fuel usage and approximately 0.09 percent for diesel fuel usage.

In addition, vehicles associated with trips to and from the project site would be subject to fuel economy and efficiency standards, which are applicable throughout the State. As such, the fuel efficiency of vehicles associated with project operations would increase throughout the life of the proposed project. The proposed project would also provide alternative transportation on site with the addition of a bus stop as well as short-term and long-term bicycle accommodations. Approximately 5 percent of all parking spaces would be outfitted with electric vehicle (EV) charging stations, and an additional 15 percent of spaces would be EV ready. Therefore, implementation of the proposed project would not result in a substantial increase in transportation-related energy uses. As such, fuel consumption associated with the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel related to transportation.

Conclusion. Based on the analysis presented above, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy during construction or operation, and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Impacts would be **less than significant**, and no mitigation measures would be necessary.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. In 2002, the Legislature passed SB 1389, which required the CEC to develop an integrated energy plan every 2 years for electricity, natural gas, and transportation fuels for the Integrated Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing

[35] United States Department of Transportation (DOT). 2021. Average Fuel Efficiency of U.S. Light Duty Vehicles. Website: www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles (accessed June 2023).

[36] California Energy Commission (CEC). 2015. Medium and Heavy-Duty Truck Prices and Fuel Economy 2013–2026. Website: efiling.energy.ca.gov/getdocument.aspx?tn=206180 (accessed November 2023).

incentive programs for zero emission vehicles (ZEVs) and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

As indicated above in Response 4.6(a), energy usage on the project site during construction would be temporary in nature. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the State's available energy sources, and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the project's total impacts to regional energy supplies would be minor, the proposed project would not conflict with California's energy conservation plans as described in the CEC's 2023 Integrated Energy Policy Report.[37] In addition, the proposed project would comply with CCR Title 24 and CALGreen Code standards. The proposed project would also include LEED-NC v4 Silver Standards and would implement sustainability features that would increase energy efficiency. Additionally, the proposed project would provide alternative transportation on site with the addition of a bus stop, as well as short-term and long-term bicycle accommodations. Approximately 5 percent of all parking spaces would be outfitted with EV charging stations, and an additional 15 percent of spaces would be EV ready. As such, the proposed project would comply with strategies outlined in the CEC 2023 Integrated Energy Plan. Therefore, the proposed project would not conflict with or obstruct any State or local plans related to renewable energy or energy efficiency. Impacts would be **less than significant**, and no mitigation measures would be necessary.

[37] California Energy Commission (CEC). 2023. *2023 Integrated Energy Policy Report.* Website: file:///C:/Users/BMartinez/Downloads/TN253056_20231108T163813_Draft%202023%20Intergrated%20Energy%20Policy%20Report%20(IEPR).pdf (accessed November 2023).

4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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 wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

4.7.1 Impact Analysis

The following discussion is based on the project-specific Geotechnical Investigation[38] (**Appendix D-1**) and the Paleontological Resources Assessment[39] prepared by LSA (**Appendix D-2**).

a. Would the project 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.

[38] Geotechnical Professionals, Inc. (GPI). 2023. *Geotechnical Investigation, Proposed Behavioral Health Campus, Riverside University Health System Perris Wellness Village, NEC Water Street and Harvill Avenue, Perris, California*. November (revised December 20, 2023).

[39] LSA Associates, Inc. (2023b). *Paleontological Resources Assessment for the Mead Valley Wellness Village Project*. November.

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) mitigates fault rupture hazards by prohibiting the development of structures for human occupancy across the trace of an active fault. The Alquist-Priolo Act requires the State Geologist to delineate "earthquake fault zones" along faults that are "sufficiently active" and "well defined." The boundary of an earthquake fault zone is generally 500 feet from major active faults and between 200 feet and 300 feet from well-defined minor faults.

According to the Geotechnical Investigation, the nearest fault to the project site is the San Jacinto Fault, which is approximately 7.5 miles east of the project site. There are no known faults crossing the project site and the project site is not located in a Alquist-Priolo Special Studies zone. As such, no potential substantial adverse effects, including the risk of loss, injury, or death, related to fault rupture would result from implementation of the project. No mitigation is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The site is located in a seismically active area typical of Southern California and is likely to be subjected to strong ground shaking due to earthquakes on nearby faults. During the life of the proposed project, the site will likely be subject to strong ground motions due to earthquakes on nearby faults. Based on the United States Geological Survey (USGS) and Structural Engineers Association of California (SEAOC) websites, Geotechnical Consultants, Inc. computed that the site could be subjected to a peak ground acceleration (PGA) of 0.60 g (for a mean magnitude 7.5 earthquake).

The structural design will need to incorporate measures to address the effects of strong ground motion. The seismic design of the proposed development will be in accordance with the 2022 California Building Code (CBC) criteria. A Site Class C (Very Dense Soil and Soft Rock) may be used for design in accordance with the 2022 CBC. Using the Site Class, the appropriate seismic design parameters from the CBC can be determined by the Project Structural Engineer and incorporated into project design and construction.

Standard Condition. Standard Condition **(SC) GEO-1** is a regulatory requirement that would be implemented as part of the proposed project to ensure that potential substantial adverse effects (including the risk of loss, injury, or death) related to strong seismic ground shaking are less than significant.

SC GEO-1 The Contractor shall provide evidence to the County of Riverside Plan Review Inspection for review and approval that on-site structures, features, and facilities have been designed and will be constructed in conformance with applicable provisions of the California Building Code (CBC) in effect at the time of construction and the recommendations cited in Section 6 of the project-specific Geotechnical Investigation (Appendix D-1 of this document). Geotechnical recommendations include, but are not limited to, the following:

- Excavations will be required to remove undocumented fill and a portion of natural soils within the proposed building pads.

- In areas to receive pavements and hardscape, it is recommended that the upper 1 foot be removed and replaced as properly compacted fill to provide uniform support. In addition, prior to placement of fill the subgrade should be scarified, moisture conditioned, and compacted.

This condition shall be implemented to the satisfaction of the County of Riverside Deputy Building Official or designee.

Proper engineering design and construction in conformance with CBC and American Society of Civil Engineers (ASCE) 7-10 standards and project-specific geotechnical recommendations (**SC GEO-1**) would ensure potential substantial adverse effects, including the risk of loss, injury, or death, from strong seismic ground shaking would be less than significant. Mitigation is not required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Soil liquefaction is a phenomenon in which saturated cohesionless soils undergo a temporary loss of strength during severe ground shaking and acquire a degree of mobility sufficient to permit ground deformation. In extreme cases, the soil particles can become suspended in groundwater, resulting in the soil deposit becoming mobile and fluid-like. Liquefaction is generally considered to occur primarily in loose to medium-dense deposits of saturated soils. Thus, three conditions are required for liquefaction to occur: (1) a cohesionless soil of loose to medium density; (2) a saturated condition; and (3) rapid large strain and cyclic loading, which is normally provided by earthquake motions.

According to the Geotechnical Investigation, the site is not located in an area that has been mapped for liquefaction by the State of California and is located in an area mapped by the County to have a low susceptibility to liquefaction. The Geotechnical Investigation also indicated that groundwater was not encountered in exploration and is expected to be greater than 60 feet below the existing ground surface. Due to the deep groundwater and dense nature of the natural material at the site, the subsurface soils do not exhibit potential for liquefaction-induced settlements. Potential substantial adverse effects (including the risk of loss, injury, or death) related to seismic-related ground failure (including liquefaction) would be less than significant, and mitigation is not required.

iv. Landslides?

Less Than Significant Impact. The project site is characterized by flat topography and is not within an area potentially subject to earthquake-induced landslides.[40] Additionally, the project site is surrounded by flat vacant terrain and developed uses. Therefore, the likelihood of a landslide on the project site is very low, and potential substantial adverse effects (including the risk of loss, injury, or death associated with landslides) are less than significant. No mitigation is required.

[40] United States Geological Survey (USGS). n.d. U.S. Landslide Inventory. Website: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d (accessed August 22, 2023).

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The project site is currently undeveloped and sparsely vegetated, with no paved surfaces. Surface soils are compacted and disturbed. Construction activities, such as vegetation grubbing, grading, and other excavation, would disturb surface soils, rendering them susceptible to erosion from wind and water.

The County is a co-permittee under the Santa Ana Regional Water Quality Control Board (SARWQCB) Order Number R8-2010-0033, NPDES Permit No. CAS618033, as amended by Order No. R8-2013-0024, also known as the Municipal Separate Storm Sewer System Permit (MS4 Permit). In order to address the potential for erosion pursuant to the MS4 Permit, the project is required to implement BMPs during the construction phase that would reduce erosion in accordance with NPDES regulations. These BMPs may include covering stockpiled soils and use of straw bales and silt fences to minimize off-site sedimentation and would be selected as part of the SWPPP that is required to address erosion and discharge impacts associated with the proposed on-site ground-disturbing activities. Wind erosion would be minimized through soil stabilization measures required by SCAQMD Rule 403 (Fugitive Dust). In addition, the site would be covered with asphalt, concrete, and landscaping materials during operations. Therefore, when compared to the existing undeveloped condition, soil erosion would be minimal. Compliance with State and federal requirements, as well as with County grading permit requirements, would ensure that the proposed project would have a less than significant impact related to soil erosion or loss of topsoil. Mitigation is not required.

c. 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, subsidence, liquefaction or collapse?

Less Than Significant Impact. Refer to Response 4.7(a)(iii). The site is not located in an area that has been mapped for liquefaction by the State of California, and is located in an area mapped by the County to have a low susceptibility to liquefaction. Due to the deep groundwater and dense nature of the natural material at the site, the subsurface soils do not exhibit potential for liquefaction. Accordingly, the potential for liquefaction-induced lateral spreading and settlement is also considered to be very low.

Refer to Response 4.7(a)(iv). The project site is characterized by flat topography and is not within an area potentially subject to earthquake-induced landslides.[41] Additionally, the project site is surrounded by flat undeveloped terrain and some urban development. Therefore, the likelihood of a landslide on the project site is very low, and impacts associated with landslides are less than significant. With planned site grading in accordance with **SC GEO-1**, no significant impacts from landslides or slope instabilities at the project site are likely to occur.

The Geotechnical Investigation included 36 explorations to depths of 6 to 50 feet below ground surface (bgs) and a geophysical survey providing shear wave velocities of project site soils to 100 feet

[41] United States Geological Survey (USGS). n.d. U.S. Landslide Inventory. Website: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d (accessed August 22, 2023).

bgs to determine the stability of subsurface geologic units and soils. The results indicated the project site's subsurface profile is consistent with shallow fill soils overlying natural soils. The natural soils encountered below the suspected fill soils are interbedded with properties consistent with sands with silt, silty sands, clayey sands, sandy clays, and silty clays to the 50-foot depth explored. In general, the finer-grained soils were hard and the sandy soils were medium dense to dense. At depths greater than approximately 20 feet, the soils become very dense. According to the Geotechnical Investigation, these near-surface soils have a very low expansion potential. Further, the project site-specific investigation concluded that the proposed project would be safe for its intended use against hazard from landslide, settlement, or slippage, and the proposed project would not have an adverse effect on the stability of the site or adjoining properties. Incorporation of **SC GEO-1** as part of the project would ensure impacts from subsidence and/or collapse would be less than significant, and no mitigation is required.

Compliance with State and federal requirements, County grading permit requirements, recommendations contained in the Geotechnical Investigation, and **SC GEO-1** would ensure that the proposed project would have a less than significant impact and would not cause unstable geologic units or soil and would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. Mitigation is not required.

d. Would the project 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?

Less Than Significant Impact. According to the Geotechnical Investigation, the cone penetration test indicated that the project site consists of non-expansive soils. In addition, the proposed development may be supported on spread footings bearing on properly compacted fill. An allowable net bearing capacity on the order of 4,000 to 5,000 pounds per square foot may be used for preliminary design.

Compliance with State and federal requirements, County grading permit requirements, recommendations contained in the Geotechnical Investigation, and **SC GEO-1** would ensure that impacts from expansive soils would be less than significant. Mitigation is not required.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The project would not require the construction or expansion of septic tanks or alternative wastewater disposal systems. The proposed Wellness Village would be connected to the municipal wastewater system, and septic tanks and/or alternative wastewater disposal systems would not be used. No impact would occur, and no mitigation is required.

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

Less Than Significant with Mitigation Incorporated. The Paleontological Resources Assessment prepared by LSA (dated August 28, 2023) evaluated potential impacts on paleontological resources

with implementation of the proposed project. The project site is in the Peninsular Ranges Geomorphic Province, a 900-mile-long, northwest-southeast-trending structural block with similarly trending faults that extends from the Transverse Ranges in the north to the tip of Baja California in the south and includes the Los Angeles Basin. The total width of this province is 225 miles, extending from the Colorado Desert in the east across the continental shelf to the southern Channel Islands (i.e., Santa Barbara, San Nicolas, Santa Catalina, and San Clemente) in the west. This province is characterized by a series of mountain ranges and valleys that trend in a northwest-southeast direction and roughly parallel to the San Andreas Fault Zone. It contains extensive pre-Cenozoic (more than 66 Ma) igneous and metamorphic rocks covered by Cenozoic (less than 66 Ma) sedimentary deposits.

Geologic mapping shows that the entire project site is underlain by Very Old Alluvial Fan Deposits. The geotechnical report prepared for this project also noted undocumented Artificial Fill in the project site from previous development of structures and nearby roads. According to the locality search conducted by the Natural History Museum of Los Angeles County (NHM), there are no known fossil localities within the project site. However, the NHM has records of several fossil localities near the project within western Riverside County from unknown Pleistocene sediments similar in age and depositional environment to those found in the project site. The closest, LACM 5168, located at Point Marina Drive in the East Bay section of Canyon Lake less than 10 miles south of the project site, produced remains of horse (*Equus*). LACM CIT570–CIT572 yielded remains of horse (*Equus*), peccary (*Platygonus*), and camel (*Camelops*) from Lake Elsinore. Fossils of animals from the elephant clade (Proboscidea) and of hoofed mammal (Ungulata) were found at LACM 7261 at Skinner Reservoir in Auld Valley. At the junction of Jackrabbit Trail and Gilman Springs Road in San Jacinto Valley, LACM 4540 produced fossils from the horse family (Equidae). Finally, LACM 1207 produced remains of cloven-hoofed mammal (Bovidae) from a location on a hill east of a sewage disposal plant 1 mile north-northwest of Corona.

Artificial Fill consists of sediments that have been removed from one location and transported to another location by human activity rather than by natural means. In some instances, the Artificial Fill may consist of reworked native sediment within a project site while in others the material may have been transported many miles, and composition is dependent on the source and purpose. Artificial Fill will sometimes contain modern debris such as asphalt, wood, bricks, concrete, metal, glass, plastic, and even plant material. The geotechnical report prepared for this project identified Artificial Fill from the surface to a depth of 2 to 5 feet across the project site but noted the Artificial Fill was difficult to distinguish from the underlying native sediments. While Artificial Fill may contain fossils, these fossils would likely have been removed from their original location and would be out of stratigraphic context. Therefore, they would not be considered important for scientific study. Artificial Fill has no paleontological sensitivity.

The Very Old Alluvial Fan Deposits below the artificial fill formed during the middle to early Pleistocene (129,000 years ago to 2.58 Ma) from sediment carried by rivers and streams down the mountains. They were deposited at the mouths of canyons, along the sides of hills flanking river and stream valleys, and within the valleys themselves, and consist of moderately to well consolidated silt, sand, gravel, and conglomerate.

The Very Old Alluvial Fan Deposits formed during an interval that spans three North American Land Mammal Ages (NALMA): the Rancholabrean (11,000 to 240,000 years ago), the Irvingtonian (240,000 years ago to 1.8 Ma), and the Blancan (1.8 to 4.75 Ma). Fossils are known in similar Rancholabrean, Irvingtonian, and Blancan deposits from excavations for roads, housing developments, and quarries, as well as scientific investigations within the Southern California area. These fossils may include mammoths, mastodons, horses, camels, saber-toothed cats, coyotes, deer, peccaries, and sloths, as well as smaller animals like rodents, rabbits, birds, reptiles, and fish. As such, the Very Old Alluvial Fan Deposits are considered to have high paleontological sensitivity.

The project site contains Artificial Fill, which has no paleontological sensitivity, and Very Old Alluvial Fan Deposits, which have high paleontological sensitivity. With a maximum depth of 25 feet, excavation for the proposed project is expected to extend into deposits with high paleontological sensitivity. Based on the finding that the project site has a "high sensitivity" for paleontological resources, the project may have a significant impact related to unanticipated discoveries of unique paleontological resources. **MM PAL-1, MM PAL-2, and MM PAL-3** shall be implemented to ensure impacts are reduced to less than significant.

MM PAL-1 Prior to ground-disturbing activities, a qualified professional paleontologist who meets the standards set by the Society of Vertebrate Paleontology (SVP) shall be retained to develop and implement a Paleontological Resources Impact Mitigation Program (PRIMP) for this project. The PRIMP shall be reviewed and approved by the County of Riverside (County). The PRIMP shall adhere to the performance standards and practices from the SVP Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. These procedures shall include the methods that will be used to protect unique paleontological resources in the event of an unanticipated discovery within the project site, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of ground disturbance.

MM PAL-2 Ground-disturbing activities in deposits with high paleontological sensitivity (i.e., Very Old Alluvial Fan Deposits) shall be monitored by a qualified paleontological monitor following the PRIMP. No monitoring is required for excavation in deposits with no paleontological sensitivity (i.e., Artificial Fill). If paleontological resources are encountered during the course of ground disturbance, the paleontological monitor shall have the authority to temporarily redirect construction in a 50-foot radius of the find in order to assess its significance. In the event that paleontological resources are encountered when a paleontological monitor is not present, work in the immediate area of the find shall be redirected and the paleontologist or paleontological monitor contacted to assess the find for scientific significance. If determined to be scientifically significant, the fossil shall be collected from the field. The qualified paleontological monitor shall follow the SVP's 2010 Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources if the resource requires salvage.

MM PAL-3 Collected resources shall be prepared to the point of identification, identified to the lowest taxonomic level possible, catalogued, and curated into the permanent

collections of a museum repository. At the conclusion of the monitoring program, a report of findings shall be prepared to document the results of the monitoring program.

Implementation of **MM PAL-1, MM PAL-2, and MM PAL-3** would reduce impacts on paleontological resources to less than significant with mitigation incorporated by ensuring paleontological resources would be subject to scientific recovery, evaluation, and curation.

4.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Greenhouse gases (GHGs) are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO_2);
- Methane (CH_4);
- Nitrous oxide (N_2O);
- Hydrofluorocarbons (HFCs);
- Perfluorocarbons (PFCs); and
- Sulfur hexafluoride (SF_6).

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which is believed to be causing global warming. While GHGs include naturally occurring GHGs such as CO_2, CH_4, and N_2O, some gases, like HFCs, PFCs, and SF_6 are completely new to the atmosphere. Certain gases are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term.

These gases vary considerably in terms of global warming potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by 1 unit mass of the GHG to the ratio of heat trapped by 1 unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e).

4.8.1 Impact Analysis

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. *State CEQA Guidelines* Section 15064(b) states that the "determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data," and further states that an "ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting."

Appendix G of the *State CEQA Guidelines* includes significance thresholds for GHG emissions. A project would normally have a significant effect on the environment if it would do either of the following:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Currently, there is no Statewide quantified GHG emissions threshold that has been used to determine the potential GHG emissions impacts of a project. Some air districts in California have developed threshold methodology and quantified thresholds for the regions they are responsible for serving. To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD convened a GHG CEQA Significance Threshold Working Group (Working Group). Based on the last Working Group meeting held in September 2010 (Meeting No. 15), the SCAQMD proposed to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency. However, the significance of GHG emissions may also be evaluated based on locally adopted quantitative thresholds or consistency with a regional GHG reduction plan (such as a Climate Action Plan [CAP]) consistent with the *State CEQA Guidelines*.

Section 15064.4 of the *State CEQA Guidelines* states that: "A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." In performing that analysis, the lead agency has discretion to determine whether to use a model or methodology to quantify GHG emissions, or to rely on qualitative analysis or performance-based standards. In making a determination as to the significance of potential impacts, the lead agency then considers the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting, whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project, and 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. Therefore, consistent with *State CEQA Guidelines* Section 15183.5, if a project is consistent with an adopted qualified Greenhouse Gas Reduction Strategy that

meets the standards, it can be presumed that the project would not have significant GHG emission impacts.

The County adopted the 2019 Climate Action Plan Update[42] (CAP Update) on December 17, 2019. The County's CAP Update includes GHG reduction measures that work towards reducing 525,511 metric tons (MT) of CO_2e by 2030 and 2,982,947 MT CO_2e by 2050 from an Adjusted Business As Usual (ABAU) forecast. These targets are consistent with the State's recommended emission reduction goals of 40 percent reduction below 2008 levels by 2030, and an 83 percent reduction below 2008 levels by 2050. The County's CAP Update was adopted to comply with *State CEQA Guidelines* Section 15183.5 for preparation of a plan for the reduction of GHG emissions. Consistent with Section 15183.5, subsequent project-specific environmental documents may tier from and/or incorporate by reference the County's CAP Update.

As discussed in the County's CAP Update, the analysis of specific development projects can be completed either through emissions calculations or by using the CAP Update's screening tables. The County's CAP Update uses an initial screening threshold of 3,000 MT CO_2e per year (MT CO_2e/yr) during operation. A threshold level above 3,000 MT CO_2e/yr is used to identify projects that require the use of screening tables or a project-specific technical analysis to quantify and mitigate project emissions. As such, the proposed project would be evaluated using the County's CAP thresholds in order to determine compliance with the County's CAP Update. If the proposed project is below the screening threshold or is consistent with the CAP screening tables, it would be considered to be consistent with the County's CAP Update. Consistent with *State CEQA Guidelines*, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions.

Furthermore, the proposed project is also evaluated for compliance with applicable plans and policies adopted for the purpose of reducing GHG emissions. Applicable GHG reduction plans include the County's General Plan, the 2022 Scoping Plan, and the SCAG 2020–2045 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The County's General Plan includes goals and policies that aim to reduce GHG emissions through energy efficiency, land use, air quality, and transportation measures. The 2022 Scoping Plan[43] assesses progress towards achieving the SB 32 2030 target and lays out a path to achieve carbon neutrality no later than 2045, consistent with State goals. Furthermore, the SCAG 2020-2045 RTP/SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light-duty trucks, and would thereby reduce GHG emissions from these sources. Consistency with these plans would help determine if the project is on track with meeting State and regional goals to reduce GHG emissions.

[42] County of Riverside. 2019. *2019 Climate Action Plan (CAP) Update*. Website: https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-CAP-2019-2019-CAP-Update-Full.pdf (accessed November 2023).

[43] California Air Resources Board (CARB). 2021. *2022 Scoping Plan Update*. May 10. Website: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf (accessed August 2023).

This section discusses the project's impacts related to the release of GHG emissions for the construction and operational phases of the project.

Construction Activities. Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. CH_4 would also be emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The SCAQMD and County do not provide a separate GHG significance threshold for construction emissions; rather, applicable guidance specifies that construction emissions should be amortized over 30 years (a typical project lifetime), added to the project operational emissions, and that total compared to the GHG significance threshold.

Emissions estimates for operation of the proposed project were calculated using CalEEMod. As discussed in Section 4.3, Air Quality, of this IS/MND, construction of the proposed project would begin in 2024 and would be completed by 2026, which was included in CalEEMod. Construction equipment, number of equipment, horsepower, and hours of operation were provided by the Project Applicant and included in CalEEMod (**Appendix A**).[44] This analysis conservatively assumes the use of Tier 2 construction equipment, except for cranes, forklifts, and generator sets, which were assumed to use Tier 4 Final engines as provided by the Project Applicant. In addition, construction activities would require the soil export of approximately 6,000 cubic yards, which was also included in CalEEMod. Default assumptions (e.g., construction worker and truck trips and fleet activities) from CalEEMod were used where project-specific information is not available. **Appendix A** provides the CalEEMod output sheets.

As shown in Table 4.8.A, construction of the proposed project is estimated to generate a total of approximately 2,912.3 MT CO_2e/yr during the 24-month construction period. When annualized over the 30-year life of the project, construction emissions would be approximately 97.1 MT CO_2e/yr (see the CalEEMod output in **Appendix A** for details). Because there is no separate GHG significance threshold for construction emissions, the amortized construction emissions were evaluated as part of the total operational GHG emissions below, which as shown in Table 4.8.B are found to be less then significant. Therefore, project-level and cumulative GHG emissions during construction activities would be **less than significant**, and no mitigation is required.

[44] The CalEEMod analysis evaluated project construction emissions with a start date of January 3, 2024, and a duration of 24 months. The proposed project's construction schedule has since been modified such that project construction would occur over a 31-month duration with a start date of June 3, 2024. This minimal modification to the project construction schedule was reviewed by LSA and it was determined that the modified construction duration would not result in any more severe air quality or GHG impacts than what is described within.

Table 4.8.A: Construction Greenhouse Gas Emissions

Construction Year	Total Emissions per Phase (MT)			Total Emissions per Phase (MT CO_2e)
	CO_2	CH_4	N_2O	
2024	1,148.7	<0.1	<0.1	1,163.0
2025	1,723.6	0.1	0.1	1,748.5
2026	0.8	<0.1	<0.1	0.8
Total Emissions for the Entire Construction Process				**2,912.3**
Total Construction Emissions Amortized over 30 Years				**97.1**

Source: Compiled by LSA Associates, Inc. (November 2023).
CH_4 = methane
CO_2 = carbon dioxide
MT = metric tons
MT CO_2e = metric tons of carbon dioxide equivalent
N_2O = nitrous oxide

Table 4.8.B: Long-Term Operational Greenhouse Gas Emissions

Source	Pollutant Emissions (MT/yr)			
	Total CO_2	CH_4	N_2O	CO_2e
Mobile Sources	3,901.0	0.2	0.2	3,967.8
Area Sources	12.0	<0.1	<0.1	12.0
Energy Sources	2,173.5	0.2	<0.1	2,181.1
Water Sources	107.9	1.7	<0.1	162.7
Waste Sources	128.0	12.8	0.0	447.8
Stationary Sources	68.5	<0.1	<0.1	68.8
Total Project Emissions				**6,840.2**
Amortized Construction Emissions				**97.1**
Annual Project Emissions				**6,937.3**
Riverside County Screening Threshold				**3,000.0**
Emissions Exceed Threshold?				**Yes**

Source: Compiled by LSA Associates, Inc. (November 2023).
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
MT/yr = metric tons per year
N_2O = nitrous oxide

Operational GHG Emissions. Operational GHG emissions are typically generated from mobile sources (cars, trucks, and buses), area sources (maintenance activities and landscaping), stationary sources (diesel generators), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include project-generated vehicle and truck trips to and from the project site. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site. Energy-source emissions would be generated at off-site utility providers because of increased electricity demand generated by the project. Waste-source emissions generated by the proposed project would include energy generated by land filling and other methods of disposal related to transporting and managing project-generated waste. Water-source emissions associated with the proposed project would be generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment. In addition, stationary-source emissions would be associated with the use of the four on-site

emergency back-up diesel generators, which are expected to run approximately 50 hours per year each.

Following guidance from the SCAQMD, GHG emissions were estimated for the operational year of 2026 using CalEEMod. As discussed in Section 4.3, Air Quality, of this IS/MND, the proposed project analysis was conducted using land use codes *Medical Office Building, General Office Building, Apartments Mid-Rise*, and *Parking Lot.* Other factors that were included in the model are as follows:

- The trip generation rates used in CalEEMod assume that the proposed project would generate approximately 2,862 average daily trips.
- The CalEEMod analysis incorporates the proposed four 900-horsepower diesel back-up generators that would each run for approximately 50 hours per year during routine maintenance and testing.
- The MAWA for the project site was estimated by the Project Applicant to be approximately 4,397,086 gallons of water per year, which was also included in CalEEMod. As discussed in Section 4.19, Utilities and Service Systems, the Eastern Municipal Water District (EMWD) also provided a preliminary irrigation estimate for the proposed project of 3,977,724 gallons per year (gpy), which is slightly less than the MAWA estimate. As such the proposed project's anticipated outdoor water use determined by the MAWA is a conservative estimate and represents a worst-case scenario. In order to fully analyze the proposed project's potential impact on the environment, analysis contained in this IS/MND is based on the more conservative estimate of 4,397,086 gpy of outdoor water use.
- Default assumptions from CalEEMod were used to further estimate project emissions where project-specific information was not available.

The proposed project's estimated operational GHG emissions are provided in Table 4.8.B. **Appendix A** provides the CalEEMod output sheets.

As shown in Table 4.8.B, the project is estimated to generate 6,937.3 MT CO_2e/yr. This would exceed the County's review initial screening threshold of 3,000 MT CO_2e/yr. Therefore, an analysis of the project's consistency with the County's CAP Update screening tables was conducted to evaluate the project's consistency with the CAP GHG reduction measures and determine significance under CEQA.

As stated above, the County's CAP Update includes screening tables to help the County provide a streamlined review process for new development projects that require compliance with CEQA. The County's screening tables assign points for each option incorporated into a project as mitigation or a project design feature. The point values correspond to the minimum emissions reduction expected from each feature. Projects that garner at least 100 points would be consistent with the reduction quantities anticipated in the County's CAP Update. Consistent with the *State CEQA Guidelines*, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions.

The screening table for GHG Implementation Measures for Commercial Development and Public Facilities was completed for the proposed project (included in **Appendix E**) and the proposed project scored 326 total points. This score is based on the proposed project's plans to meet LEED-NC v4 Silver Standards, and the proposed buildings would be designed to provide user comfort and enhanced indoor environmental quality while simultaneously maximizing energy efficiency. The proposed project would include the following energy and water efficiency features: water efficient irrigation system (50 percent reduction or more), native plant species for landscape areas, low-e glazing windows, solar roofing with low reflectance indices, efficient plumbing fixtures, EnergyStar certified appliances, light fixtures that minimize light pollution, solar energy for approximately 12 percent of the total energy used by buildings, and a minimum of 65 percent of nonhazardous waste being recycled and 100 percent of vegetation waste being collected for reuse. With the implementation of these project design features, the proposed project scored 82 points using the screening tables. Furthermore, the proposed project would support alternative transportation on site with the addition of a bus stop, as well as short-term and long-term bicycle accommodations. Approximately 5 percent of all parking spaces would be outfitted with EV charging stations, and an additional 15 percent of spaces would be EV ready. As such, the proposed project would be consistent with the EV charging measure from the screening tables and scored an additional 244 points. As mentioned above, projects that exceed the initial threshold of 3,000 MT CO_2e/yr would be required to be evaluated using the screening tables. Projects would need to obtain at least 100 points to be consistent with the reduction measures from the County's CAP Update. Because the proposed project would obtain at least 100 points, it would be consistent with the reduction quantities anticipated in the County's CAP Update. Therefore, the proposed project would be consistent with the County's CAP Update, and no additional analysis is required. The County's CAP Update was adopted to comply with *State CEQA Guidelines* Section 15183.5 for the preparation of a plan for the reduction of GHG emissions. Therefore, consistent with the *State CEQA Guidelines*, if a project is consistent with an adopted qualified Greenhouse Gas Reduction Strategy, such as a CAP, it can be presumed that the project would not have significant GHG emission impacts. As such, project-level and cumulative GHG emissions would be less than significant, and mitigation is not required.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

***Less Than Significant Impact*.** The proposed project was analyzed for consistency with the County's CAP Update, the goals of the 2022 Scoping Plan, and the SCAG 2020–2045 RTP/SCS.

Riverside County CAP Update. As described above in Response 3.8(a), the County's CAP Update is a comprehensive planning document outlining the County's proposed approach to reduce Riverside County's impact on the climate by reducing GHG emissions. Evaluating the project's consistency with the goals of the County's CAP Update fulfills the CEQA goal of fully informing local agency decision-makers of the environmental impact of a project. A project that accumulates at least 100 points using the screening tables will be consistent with the reduction quantities anticipated in the CAP Update. As mentioned above, the proposed project scored 326 total points. Because the proposed project would obtain at least 100 points, it would be consistent with the reduction quantities anticipated in the County's CAP Update.

In addition, the proposed project was evaluated for consistency with the County's CAP Update goals. The following GHG goals and reduction strategies from the County's CAP Update are applicable to the proposed project:

- **R2-T3:** Ridesharing and Bike-to-Work Programs within Businesses
- **R2-EE10:** Energy Efficiency Enhancement of Existing and New Infrastructure
- **R2-CE1:** Clean Energy
- **R2-L1:** Tree Planting for Shading and Energy Saving
- **R2-W1:** Water Efficiency through Enhanced Implementation of Senate Bill X7-7
- **R2-W2:** Exceed Water Efficiency Standards
- **R2-S1:** Reduce Waste to Landfills

The proposed project would be in proximity to residential areas, which would facilitate the implementation of ridesharing and bike-to-work programs. In addition, the proposed project would be required to implement transportation measures consistent with the County's CAP Update to reduce VMT. Alternative transportation would also be supported on site with the addition of a bus stop as well as short-term and long-term bicycle accommodations. In addition, 5 percent of all parking spaces would be outfitted with EV charging stations, and an additional 15 percent of spaces would be EV ready. The proposed project would also be consistent with the goal in the County's CAP Update of increasing water and energy efficiency in new buildings by complying with the latest CBC (Title 24), including the latest CALGreen Code standards. In addition, the proposed project would include the following energy and water efficiency features: water efficient irrigation system (50 percent reduction or more), native plant species for landscape areas, low-e glazing windows, solar roofing with low reflectance indices, efficient plumbing fixtures, EnergyStar certified appliances, light fixtures that minimize light pollution, solar energy for approximately 12 percent of the total energy used by buildings. Construction of the project would include a diversion of construction waste from landfills to recycling consistent with current local and State standards and the goals in the County's CAP Update to increase diversion and reduction of waste. The proposed project would also include landscape and recreational areas that would meet the tree planting and shading goals of the County's CAP Update. As such, the proposed project would be consistent with the applicable strategies from the County's CAP Update.

Scoping Plan. Executive Order (EO) B-30-15, signed in April 2015, established the immediate target of reducing California's GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan (i.e., 2017 Scoping Plan), to reflect the 2030 target set by EO B-30-15 and codified by SB 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emission reduction target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. The companion bill to SB 32 (i.e., Assembly Bill [AB] 197) provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions.

In December 2022, the CARB released the 2022 Scoping Plan. The 2022 Scoping Plan assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and

is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan contains GHG reduction measures that work toward reducing GHG emissions, consistent with the targets set by EO B-30-15 and codified by SB 32 and AB 197. The measures applicable to the proposed project include energy efficiency measures, water conservation and efficiency measures, and transportation and motor vehicle measures, as discussed below.

The energy efficiency measures in the 2022 Scoping Plan include prioritizing actions to mitigate impacts to electricity reliability and affordability and targeting programs and incentives to support and improve access to renewable and zero-carbon energy projects (e.g., rooftop solar, community-owned or controlled solar or wind, battery storage, and microgrids). These measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts (including new technologies and new policy and implementation mechanisms such as clean energy, carbon neutral, and zero emission vehicles and trucks), and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The proposed project would be required to comply with the latest CCR Title 24 standards, which were established by the CEC, regarding energy conservation and green building standards. As such, the proposed project would be consistent with State building code requirements as Title 24 advances to implement the building decarbonization goals from the 2022 Scoping Plan. In addition, the proposed project would include electric vehicle charging spaces to comply with the CALGreen Code Tier 2 off-street requirements. The proposed project would also include low-e glazing windows, solar roofing with low reflectance indices, efficient plumbing fixtures, EnergyStar-certified appliances, light fixtures that minimize light pollution, and solar energy for approximately 12 percent of the total energy used by buildings. Therefore, the proposed project would include energy efficiency measures that would be consistent with the 2022 Scoping Plan for the purpose of reducing GHG emissions and maximizing energy efficiency in buildings, advancing towards clean energy, and ZEVs. Therefore, the proposed project would not conflict with any of the energy conservation and efficiency measures in the 2022 Scoping Plan.

The water conservation and efficiency measures in the 2022 Scoping Plan are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the proposed project would be required to comply with the latest Title 24 standards of the CCR, which includes a variety of different measures, including reduction of wastewater and water use. In addition, the proposed project would also include water efficient irrigation systems (50 percent reduction or more), native plant species for landscape areas, and efficient plumbing fixtures. Therefore, the proposed project would include water efficiency measures that would be consistent with the 2022 Scoping Plan for the purpose of reducing GHG emissions and maximizing water efficiency in buildings. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures in the 2022 Scoping Plan.

The goal of the transportation and motor vehicle measures in the 2022 Scoping Plan include the following: transportation electrification, VMT reduction through developing infill sites presently served by existing utilities, locating projects in proximity to transit, and reducing parking

requirements. The project site is located near residential areas that are presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer). In addition, the proposed project would provide a pedestrian/bicycle trail along the northern and eastern edges of the project site and a new bus stop along Harvill Avenue, which would facilitate transit usage and active transportation. Alternative transportation would also be supported on site with the addition of short-term and long-term bicycle accommodations. In addition, 5 percent of all parking spaces would be outfitted with EV charging stations, and an additional 15 percent of spaces would be EV ready. As discussed in Section 4.17, Transportation, the proposed project would result in a less than significant VMT impact. Therefore, the proposed project would not conflict with the transportation and motor vehicle measures in the 2022 Scoping Plan.

2020–2045 RTP/SCS. The SCAG 2020–2045 RTP/SCS encourages land use strategies that focus new housing and job growth in areas served by high-quality transit, and other opportunity areas that focus on growth near destinations and mobility options, thereby implementing a land use development pattern that supports and complements the proposed transportation network. The core vision in the 2020–2045 RTP/SCS is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create complete streets that are safe to all roadway users, preserve the transportation system, and expand transit and foster development in transit-oriented communities. The 2020–2045 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as forecast development that is generally consistent with regional-level general plan data. The forecasted development pattern of the SCAG region, when integrated with the financially constrained transportation investments identified in the 2020–2045 RTP/SCS, would reach the regional target of reducing GHG emissions from autos and light-duty trucks by 19 percent by 2035 (compared to 2005 levels). The 2020–2045 RTP/SCS provides incentives for land use consistency to local government agencies and developers.

Implementing SCAG's 2020–2045 RTP/SCS will greatly reduce the regional GHG emissions from transportation, helping to achieve Statewide emissions reduction targets. As demonstrated in Section 4.3, Air Quality, of this IS/MND, the proposed project does not meet the criteria identified in *State CEQA Guidelines* Section 15205.b.2 (Projects of Statewide, Regional, or Areawide Significance) for projects of statewide, regional, or areawide significance. In addition, the proposed project would not require a change to the General Plan land use designation or the current zoning, and would be consistent with the County's General Plan and Zoning Ordinance. As such, the proposed project would not increase population growth forecasts and is not expected to alter SCAG's demographic projections; therefore, the proposed project is already reflected in SCAG's 2020–2045 RTP/SCS and would not interfere with SCAG's ability to achieve the region's GHG reduction target of 19 percent below 2005 per capita emissions levels by 2035. Furthermore, the proposed project is not regionally significant as defined by *State CEQA Guidelines* Section 15206 and as such, it would not conflict with the SCAG RTP/SCS targets because those targets were established and are applicable on a regional level.

The project would consist of five public health buildings, one parking structure, short-term residential facilities for patients, surface parking, landscaping, and walkways set in a campus setting. According to SCAG's 2020–2045 RTP/SCS, the unincorporated Riverside County population,

households, and employment are forecast to increase by approximately 155,100 residents, 67,300 households, and 63,500 jobs, respectively, between 2016 and 2045.[45] Based on information provided by the Project Applicant, the proposed project would have a total of approximately 605 employees. The number of new employees generated by the proposed project would fall within the 63,500 projected jobs for unincorporated Riverside County. Accordingly, the proposed project's labor demand would not be expected to substantially increase population, households, or employment in Riverside County since the number of employees associated with the proposed project would be a small fraction (approximately 1.0 percent) of the projected job growth for the county. Therefore, implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the 2020–2045 RTP/SCS.

The proposed project would have a less than significant individual and cumulative impact related to GHG emissions. Therefore, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Associated impacts would be **less than significant**, and no mitigation is required.

[45] Southern California Association of Governments (SCAG). 2020. *Connect SoCal 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy.* Website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176 (accessed November 2023).

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. 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?	☐	☒	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?	☐	☐	☒	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

This section is based on the Phase I Environmental Site Assessment (ESA)[46] prepared for the project site. The Phase I ESA report is included as **Appendix F-1** of this IS/MND.

4.9.1 Impact Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Hazardous materials are chemicals that could potentially cause harm during an accidental release or mishap, and are defined as being toxic, corrosive, flammable, reactive, an irritant, or a strong sensitizer. Hazardous substances include all chemicals regulated under the DOT "hazardous materials" regulations and the EPA "hazardous waste" regulations. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment. The probable frequency and severity of consequences from the routine transport, use, or disposal of hazardous materials is affected by the type of substance, the quantity used or managed, and the nature of the activities and operations.

[46] Partner Engineering and Science, Inc. 2023. *Phase I Environmental Site Assessment*. August 9.

Construction activities associated with the proposed project would use a limited amount of hazardous and flammable substances (e.g., oils, fuels) during heavy equipment operation for site excavation, grading, and construction. The amount of hazardous chemicals present during construction would be limited to what is required to operate construction equipment and would be handled in compliance with existing government regulations. The potential for the release of hazardous materials during project construction is low, and even if a release were to occur, it would not result in a significant hazard to the public, surrounding land uses, or the environment due to the small quantities of these materials associated with construction vehicles. Therefore, impacts are considered less than significant, and no mitigation is required.

The proposed project includes the development of the Wellness Village, which is a behavioral health campus. Behavioral health land uses typically do not present a hazard associated with the accidental release of hazardous substances into the environment because employees and patients/residents are not anticipated to use, store, dispose, or transport large volumes of hazardous materials. Hazardous substances associated with health campus uses are typically limited in both amount and use such that they can be contained without impacting the environment.

As a Wellness Village, long-term operational activities typical of the proposed medical office uses involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, radiologicals, pesticides, sterilants, disinfectants, and the handling of discarded needles. For example, maintenance activities related to the sanitizing of patient assessment and care areas may involve the limited use of cleaning chemicals and disinfectants. As stated previously, these types of activities do not involve the use of a substantial amount of hazardous materials. In addition, such materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be less than significant through compliance with these standards and regulations. Furthermore, operation of the proposed project would not transport, generate, or dispose of large quantities of hazardous substances. Therefore, potential impacts from the routine transport, use, or disposal of hazardous materials resulting from operation of the proposed project would be less than significant, and no mitigation would be required.

Riverside County maintains a directory of business hazardous materials and hazardous waste collection companies to assist with the proper disposal of hazardous waste materials. A Waste Generator Permit would be required to be issued by the County Department of Environmental Health through their Medical Waste Program to ensure that medical waste is handled, contained, and transported safely off site and in accordance to all applicable regulations regarding hazardous materials and waste. The on-site facilities would use such programs, or medical waste collection services, to properly dispose of household hazardous waste or otherwise handle disposal in a manner consistent with applicable law.

Therefore, potential impacts from the routine transport, use, or disposal of hazardous materials resulting from operation of the proposed project would be less than significant, and no mitigation would be required.

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?

Less Than Significant with Mitigation Incorporated. There are two types of hazardous material releases that could occur with implementation of the proposed project, including the accidental release of hazardous material that is routinely used during construction activities and the potential for construction activities to encounter contaminated soil or groundwater at the site. As discussed in Section 4.10, Hydrology and Water Quality, and detailed in **Regulatory Compliance Measure (RCM) HYD-1,** the construction contractor would be required to prepare and implement a SWPPP for construction activities in accordance with the NPDES General Construction Permit requirements, which would include measures for preventing spills, inspecting equipment, and fuel storage. With implementation of a SWPPP, potential impacts associated with the accidental release of hazardous material that are routinely used during construction activities would be less than significant.

A Phase I ESA was prepared for the project site. The purpose of the Phase I ESA was to evaluate the project site for potential Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), and Historical Recognized Environmental Conditions (HRECs) that may be present, off-site conditions that may impact the project site, and/or conditions indicative of releases or threatened releases of substances on, at, in, or to the project site.

- An REC can be defined as the presence or likely presence of any hazardous substances or petroleum products in or at a property due to a release to the environment, under conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment.

- A CREC can be defined as an REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

- An HREC can be defined as a past release of any hazardous substances or petroleum products that has occurred in connection with a property and has been addressed to the satisfaction of the applicable regulatory authority or meets unrestricted use criteria established by a regulatory authority without subjecting the property to any required controls.

As part of the Phase I ESA, the County of Riverside Department of Environmental Health (DEH), the California Department of Toxic Substances Control (DTSC), and the SARWQCB were contacted, and various other State and federal databases (including the California Environmental Protection Agency [CalEPA], Riverside County Department of Environmental Health [RCDEH], Riverside County Building and Safety Department [RCBSD], California Geologic Energy Management Division [CalGEM], and the SCAQMD) were reviewed in order to determine if the project site, or any adjacent properties, were listed as hazardous waste generators, underground storage tank (UST) releases, or as having any other environmental concerns. A site reconnaissance was also performed as part of the Phase I ESA. According to the Phase I ESA, one REC (a 500-gallon gasoline UST) is associated with the project site. No HRECs or CRECs were identified on or adjacent to the project site.

Based on a review of historical records, including aerial photographs and topographic maps, the project site was used as agricultural land with a residential structure in the southwestern portion of the project site from as early as 1938 to 1970. In the 1970s, a mobile home and an agricultural building were developed in the northern and northwestern portions of the project site, respectively. Agricultural use appears to have ceased between 1985 and 1997, and all structures were removed by 2009. The project site has remained undeveloped since 2009.

Because the project site was historically used for agricultural purposes, there is a potential that agricultural-related chemicals, such as pesticides, herbicides, and fertilizers, were used and stored on the project site. However, there is generally a low potential for pesticide, herbicides, and/or fertilizer soil contamination at concentrations in excess of regulatory thresholds as a result of the historical use of pesticides from normal crop application in accordance with manufacturers' recommendations. In addition, since agricultural use ceased sometime between 1985 and 1997, it is reasonable to assume that agricultural chemicals have not been applied to the project site for at least 26 years. Given the low potential for soil contamination and the time elapsed from application of agricultural chemicals on the project site, Partner concluded that the potential former use of agricultural chemicals at the project site is not considered an environmental concern.[47]

According to regulatory records, the 500-gallon gasoline UST was associated with the former property address of 23772 Water Street on the southwest portion of the project site. This area is approximately 0.75 acre in size. The exact location of the former UST is unknown, which precludes the investigation of the area via geophysical survey. According to records obtained from the SWRCB, the UST was active through the late 1980s. No additional information regarding the UST was available for review. Based on the lack of information regarding the disposition of the gasoline UST, the Phase I ESA determined this condition represents a REC.

In addition, the project site was identified as a Clandestine Drug Lab (CDL) and California Hazardous Material Incident Report System (CHMIRS) site due to a report of abandoned drug lab waste in 2001. The listing indicated that no evidence of a drug lab was identified at the subject property, but that the materials have been disposed of at a location far from the actual illegal drug lab.[48] As reported by the Riverside County Fire Department (RCFD) and the Riverside County Environmental Health Department, groundwater was not impacted by the dumping of wastes and the material was recovered by a contractor. In addition, no reportable quantities of recovered hazardous materials were identified in the regulatory database, and no follow-up investigations indicative of a significant release of hazardous materials were reported. The listing was not elevated to an REC because these types of listings typically refer to small-scale amateur drug operations that were uncovered or seized by law enforcement. The impacts of these sites are typically limited to building interiors, and likely the result of small quantities of hazardous materials. Based on the nature of the listing and the time

[47] Personal communication with Katie Griffin, Project Manager at Partner Engineering and Science, Inc. in November 2023.

[48] Ibid.

elapsed since the materials were reported, these listings are not expected to represent a potential environmental concern[49] and no further investigation or action is required.[50]

According to a prior 2011 Phase I ESA, a septic system was located on the northwestern portion of the project site. However, this feature was not observed during the August 2023 site reconnaissance as part of the Phase I SEA prepared by Partner. The septic system was likely used for disposal of household sanitary waste, and as such, the feature is not expected to represent a significant environmental concern.

The adjoining properties to the north and northwest were identified as Resource Conservation and Recovery (RCRA) Non-Generator/NLR (NONGEN) sites due to the association with construction activities of a distribution center to the north and northeast. No related violations of releases were reported, and the facility status is listed as inactive as of 2021. Because of the cross-down-gradient location, intervening distance over a roadway, inactive status, and lack of reported violations of releases, these sites are not considered a hazardous concern.

Based on the findings of the regulatory records review and site reconnaissance as presented above, the Phase I ESA provided two recommendations to reduce impacts associated with the identified REC and the former residential septic system, if discovered during construction. The proposed project would be required to implement a soil management plan to ensure that if the gasoline UST and/or petroleum impacted soils are encountered during construction of the proposed project, they are handled in accordance with State and local regulations, including the County of Riverside Department of Environmental Health Underground Storage Tank Guidelines to Closure by Removal (**Appendix F-2**).[51] Closure requirements for the 500-gallon gasoline UST would include a closure inspection by the Riverside County Department of Environmental Health, soil samples taken below the UST/piping system at the time of UST removal, the purging of flammable vapors from the UST, and proper UST disposal documentation in accordance with the requirements of Chapter 6.5, Division 20 of the Health and Safety Code. In addition, all liquids, solids, and sludge shall be removed and handled according to the provisions of Chapter 6.5, Division 20 of the Health and Safety Code and CCR Title 22, Chapter 32, Section 67383.1. The UST would also be required to be properly cleaned, which usually requires the pressure washing/rinsing of the UST and removal of the contents via a vacuum pump system that is designed to safely handle flammable liquids.[52]

The soil management plan would disclose the potential to encounter a gasoline UST and/or impacted soils on the southwest portion of the project to construction contractors so that excavation and other earthmoving construction activities would be closely monitored for evidence of impacts or subsurface anomalies.[53] In addition, construction of the proposed project would implement a precise

[49] Personal communication with Katie Griffin, Project Manager at Partner Engineering and Science, Inc. in November 2023.
[50] Ibid.
[51] County of Riverside Department of Environmental Health Hazardous Materials Management Branch. 2022. Underground Storage Tank Guidelines to Closure by Removal. June.
[52] Ibid.
[53] Personal communication with Katie Griffin, Project Manager at Partner Engineering and Science, Inc. in November 2023.

grading plan that minimizes the need for soil impart and export and minimal over-excavation and processing of undocumented fill is anticipated.

In addition, if the former residential septic system is discovered during construction of the proposed project, it would be abandoned in accordance with State and local regulations. Similar to the removal of the 500-gallon gasoline UST, abandonment of the former residential septic system would be required to ensure proper documentation in accordance with the requirements of Chapter 6.5, Division 20 of the Health and Safety Code and that all liquids, solids, and sludge would be removed and handled according to the provisions of Chapter 6.5, Division 20 of the Health and Safety Code. Compliance with local, State, and federal laws and cooperation with the RCFD Office of Emergency Services (OES), Department of Environmental Health (DEH) Environmental Protection and Oversight Division, and California Occupational Safety and Health Administration (Cal/OSHA) would further reduce impacts associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment because it would ensure the proper handling of hazardous materials should they be discovered.

Construction of the proposed project would include the implementation of a SWPPP for construction activities in accordance with the NPDES General Construction Permit, as detailed in **RCM HYD-1**, which would help to address potential impacts associated with the accidental release of hazardous materials that are routinely used during construction activities. With compliance with local, State, and federal laws discussed above, cooperation with the RCFD OES, the Riverside County DEH Environmental Protection and Oversight Division, and Cal/OSHA, and the recommendations detailed in the site-specific Phase I ESA that are specified in **MM HAZ-1**, potential impacts associated with construction activities encountering contaminated soils or groundwater at the site due to an environmental concern at the project site would be **less than significant with mitigation incorporated**.

MM HAZ-1 The Contractor shall provide evidence to the County of Riverside for review and approval that the proposed project would implement the recommendations cited in the Phase I Environmental Site Assessment (ESA) prepared for the project site (**Appendix F-1** of this document) as necessary. Recommendations include the following:

- Implement a soil management plan to ensure that if the gasoline UST and/or petroleum impacted soils are encountered during construction of the proposed project, they are handled in accordance with State and local regulations.
- If the former residential septic system is discovered during construction of the proposed project, it should be abandoned in accordance with State and local regulations.

This measure shall be implemented to the satisfaction of the County of Riverside Deputy Building Official or designee.

c. 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?

Less Than Significant Impact. The proposed Wellness Village would not produce or emit hazardous emissions or handle a significant amount of hazardous or acutely hazardous materials, substances, or wastes during either construction or operations. The nearest schools to the project site are Columbia Elementary School (located at 21350 Rider Street), which is approximately 2.4 miles northwest of the project site, and Thomas Rivera Middle School (located at 21675 Martin Street), which is approximately 2.5 miles northwest of the project site. As discussed in Response 3.9(a), the proposed project is not anticipated to release hazardous emissions or handle acutely hazardous materials, substances, or wastes in significant quantities. Construction activities associated with the proposed project would use a limited amount of hazardous and flammable substances/oils during heavy equipment operation for site excavation, grading, and construction. The amount of hazardous chemicals present during construction would be limited and would be in compliance with existing government regulations.

During operation, the Wellness Village project site would not require the use, storage, disposal, or transport of large volumes of hazardous materials that could cause serious environmental damage in the event of an accident. Although hazardous substances would be present and utilized in limited amounts within the project site, they would typically be present in small quantities, and can be cleaned up without affecting the environment. In addition, the project site is not within 0.25 mile of any schools. Therefore, impacts related to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school would be **less than significant**, and no mitigation is required.

d. 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?

Less Than Significant with Mitigation Incorporated. Government Code Section 65962.5, commonly referred to as the Cortese List, includes hazardous material site listings from the SWRCB's Geotracker database, Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO), the CalEPA highly hazardous solid waste sites, and the DTSC's EnviroStor database and hazardous waste sites. As part of the Phase I ESA prepared for the proposed project, a search of available environmental records for the project site and properties up to 1 mile away from the project site was conducted, and included a review of the SWRCB's Geotracker database, the CalEPA highly hazardous solid waste sites, and the DTSC's EnviroStor database and hazardous waste sites. One listing from the SWRCB GeoTracker Database identified the project site as Historical Hazardous Substances Storage (HHSS), and Historical TANK site due to the presence of a 500-gallon gasoline UST at the former property address of 23772 Water Street on the southwest portion of the project site. However, as discussed in Response 3.9(b), compliance with local, State, and federal laws and cooperation with the RCFD OES, Riverside County DEH Environmental Protection and Oversight Division, and Cal/OSHA, including the County of Riverside Department of Environmental Health Underground Storage Tank Guidelines to

Closure by Removal requirements.[54] Further, the proposed project would be required to implement the recommendations detailed in the site-specific Phase I ESA, including implementation of a soil management plan if the gasoline UST and/or petroleum impacted soils are encountered during construction of the proposed project, as specified in **Mitigation Measure HAZ-1**. As such, impacts associated with a significant hazard to the public or the environment due to the presence of the UST would be less than significant. In addition, the project site was identified as a CDL and CHMIRS site due to a report of abandoned drug lab waste in 2001. However, as previously discussed, based on the nature of the listing and the time elapsed since the materials were reported, these listings are not expected to represent a potential environmental concern and no further investigation or action is required.

In addition, according to the Phase I ESA, the project site is not located on a federal Superfund site, State response site, voluntary cleanup site, school cleanup site, corrective action site, or tiered permit site as compiled by the DTSC EnviroStor database, and the project site is not included on the SWRCB's CDO or CAO lists.

Although the project site is listed on the SWRCB GeoTracker Database due to the presence of a 500-gallon gasoline UST, with compliance with local, State, and federal laws and cooperation with the RCFD OES, Riverside County DEH Environmental Protection and Oversight Division, and Cal/OSHA, and the recommendations detailed in the site-specific Phase I ESA, as specified in **Mitigation Measure HAZ-1**, the proposed project would not result in a significant impact related to a known hazardous materials site pursuant to Government Code Section 65965.5 and would not create a significant hazard to the public or the environment. Impacts would be **less than significant with mitigation incorporated**.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?

Less Than Significant Impact. The project site is located within the March Air Reserve Base/Inland Port (March ARB/IP) Airport Land Use Compatibility Plan (ALUCP). Within the March Joint Air Reserve Base Influence Area, the project site is located within Compatibility Zone C2. Compatibility Zone C2 is the Flight Corridor Zone and prohibits highly noise-sensitive outdoor nonresidential uses and hazards to flight. In addition, Compatibility Zone C2 imposes a maximum intensity of 200 people per acre for nonresidential uses.[55] The proposed project includes the development of a Wellness Village, including behavioral health services consisting of five buildings containing a variety of public mental health services, on-site parking, housing, grocery store, and pharmacy. The campus includes extensive outdoor yards, landscaping, and community support/amenities. The proposed project does not include the development of highly noise-sensitive outdoor nonresidential uses or hazards to flight. Further, as discussed in Section 4.14, Population and Housing, the proposed project is anticipated to increase the short-term population at the 19.41-acre project site by approximately

[54] County of Riverside Department of Environmental Health Hazardous Materials Management Branch. 2022. Underground Storage Tank Guidelines to Closure by Removal. June.

[55] Riverside County Airport Land Use Commission. 2014. *March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.* November 13.

870 people, including 428 employees and 442 temporary residents (those who would remain at the project site for longer than 30 days). This population increase at the project site would result in an intensity of approximately 45 people per acre. This intensity is consistent with the Compatibility Zone C2 maximum intensity of 200 people per acre for nonresidential use. As such, the proposed project would be consistent with the March ARB/IP ALUCP. Therefore, the proposed project would not result in safety hazards for people living or working at the project site associated with the project's vicinity to a public airport. **Less than significant** impacts would occur, and no mitigation is required.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Construction activities that could temporarily restrict vehicular traffic would incorporate appropriate measures to facilitate the passage of persons and vehicles through/around any temporary road closures in accordance with the California Fire Code as adopted by the County's Municipal Code. During construction, standard traffic control devices such as warning signs, warning lights, and flaggers will be utilized as applicable to minimize obstructions and ensure the safe passage of emergency vehicles as necessary for the purposes of coordinating efforts during local, State, and/or federal emergency events, including response to hazardous materials incidents. Implementation of these traffic control measures will include guidance and navigational tools in the vicinity of the project site in order to maintain traffic flow and safety during construction. The County of Riverside Emergency Management Department carries out plans for the protection of persons and property within Riverside County in the event of an emergency or disaster in order to provide for the direction of the emergency organization, the coordination of the emergency functions of the County with all other public agencies, corporations, organizations and affected private persons, and the continuity of government. Project implementation would not hinder the County of Riverside Emergency Management Department from fulfilling its mission.

The project is proposed with six access driveways, including two from Placentia Avenue, two from Harvill Avenue, and two from Water Street. Fire department emergency vehicle apparatus access road locations and design shall be in accordance with the California Fire Code, Riverside County Ordinance No. 787, and Riverside County Fire Department Standards to ensure proper roadway turning radii, fire lane widths, etc. Additionally, the project site layout includes provisions for emergency vehicle access, which also would be reviewed for adequacy by the County Fire Department. Therefore, impacts would be **less than significant**, and mitigation is not required.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. The project site is located within an urbanized area. The proposed project would be located in an area containing a mix of residential, commercial, and industrial land uses and some vacant parcels.

According to CAL FIRE, the project site and adjacent area is located within a Local Responsibility Area (LRA); however, it is not located within a Very High Fire Hazard Severity Zone (VHFHSZ).[56] The closest State Responsibility Area (SRA) Fire Hazard Severity Zone (FHSZ) is approximately 0.1 mile west of the project site and classified as a VHFHSZ.[57] In addition, the closest LRA VHFHSZ is approximately 0.2 mile northwest of the project site.[58] Explosive fires can cast embers several miles ahead of the actual fire location. Design and construction of the project in accordance with the CBC and California Fire Code, which include design features such as requiring the use of non-combustible materials, inclusive of structural steel, composite concrete decks, and load-bearing metal studs, and incorporation of fire sprinklers would provide protection to people and structures from the risk of loss, injury, or death involving wildland fires. Further, no wood framing would be utilized anywhere on the project site. These features would ensure the proposed project is less susceptible to fire and would therefore minimize risk of wildland fire-related loss, injury, and death to people and property in the vicinity of the project site, as well as future employees, occupants, and visitors of the proposed project. With compliance with the CBC and California Fire Code as well as incorporation of the aforementioned project design features, the risk of exposure of persons or property to wildland fires would be less than significant.

The project site is flat, and the surrounding area does not contain significant natural or manufactured slopes. The project site is generally surrounded by existing development; however, undeveloped land is located adjacent to the project site to the west, south, and east. Development of the proposed project at the project site would result in the reduction of vegetation and combustible materials necessary for the uncontrolled spread of wildfire because the proposed project would include vegetation removal and the construction of a Wellness Village in accordance with the CBC and California Fire Code. As such, implementation of the proposed project would reduce the likelihood of a wildfire or the uncontrolled spread of a wildfire at the project site.

In addition, the project itself would not exacerbate wildfire risks as compared to existing conditions because it would be similar to the scale of existing development in the area. The project would also include entry and exit points for emergency access from all perimeter streets. Fire department access locations and design would be in accordance with the California Fire Code, Riverside County Ordinance 787, and Riverside County Fire Department Standards to ensure proper roadway turning radii, fire lane widths, etc. Additionally, the project site plan includes provisions for emergency vehicle access, which also would be reviewed for adequacy by the RCFD.

Although the project site is approximately 0.1 mile east of an SRA VHFHSZ and approximately 0.2 mile southeast of an LRA VHFHSZ, implementation of the proposed project is not expected to exacerbate wildfire risks due to the lack of slopes on site, the vegetation removal proposed as part of the project, and the development of the Wellness Village in accordance with the CBC and California Fire Code. As such, the proposed project would not expose people or structures, either directly or

[56] California Department of Forestry and Fire Protection (CAL FIRE). n.d. California Fire Hazard Severity Zones (FHSZ). Website: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008 (accessed August 1, 2023).

[57] Ibid.

[58] Ibid.

indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, **less than significant** impacts are anticipated to occur, and no mitigation is required.

4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☒	☐

4.10.1 Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. The SWRCB and nine RWQCBs regulate the quality of surface water and groundwater bodies throughout California. In western Riverside County, the SARWQCB is responsible for implementation of the Water Quality Control Plan (Basin Plan).[59] The Basin Plan establishes beneficial water uses and water quality objectives for waterways and water bodies within the region. Section 303(d) of the federal Clean Water Act (CWA) requires that states identify water bodies including bays, rivers, streams, creeks, and coastal areas that do not meet water quality standards and the pollutants that are causing the impairment. Total Maximum Daily Loads (TMDLs) describe the maximum amount of a pollutant that a water body can receive while still meeting

[59] Santa Ana Regional Water Quality Control Board (SARWQCB). January 1995 (updated June 2019 to include approved amendments). Water Quality Control Plan. Website: https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/ (accessed December 2023).

established water quality standards. A TMDL establishes limits for pollutant discharges into impaired water bodies.

The project site is currently undeveloped and gently slopes in a northeasterly direction. Under existing conditions, stormwater from the project site sheet flows to an existing catch basin at the corner of Placentia Avenue and Harvill Avenue (i.e., the northeast corner of the project site) where it enters storm drains that flow into the San Jacinto River and then discharges into Canyon Lake. Canyon Lake ultimately discharges into Lake Elsinore.[60] The SWRCB *Surface Water Quality Assessment 2020-2022 Integrated Report for Clean Water Act Sections 303(d) and 305(b)* does not list any impairments for the San Jacinto River. Canyon Lake is listed as an impaired water body for nutrients, and Lake Elsinore is listed as an impaired water body for dichlorodiphenyltrichloroethane (DDT), nutrients, organic enrichment/low dissolved oxygen, polychlorinated biphenyls (PCBs), and toxicity.[61]

Runoff water quality is regulated by the NPDES Program (established through the federal CWA). The NPDES program objective is to control and reduce pollutant discharges to surface water bodies. Compliance with NPDES permits is mandated by State and federal statutes and regulations. Locally, the NPDES Program is administered by the SARWQCB.

Construction activities are subject to the SWRCB NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit [CGP]), Order No. 2022-0057-DWQ, NPDES No. CAS000002.[62] Any construction activity, including grading, that would result in the disturbance of 1 acre or more would require compliance with SWRCB's CGP, which requires preparation of a SWPPP and implementation of Construction BMPs during construction activities. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site, and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. Construction BMPs may include, but are not limited to, storing new and used petroleum products in covered areas with berms or dikes in place to contain any spills, inspecting constriction vehicles daily for leaks, cleaning up spills immediately per cleanup instructions on the package, and designating special paved areas for vehicles and equipment washing.[63]

Project operations are subject to the NPDES Permit and Waste Discharge Requirements for the Riverside County Flood Control and Water Conservation District (RCFCWCD), the County of Riverside, and the Incorporated Cities of Riverside County Within the Santa Ana Region, Order No. R8-2010-

60 Personal communication with Kyle Koivuniemi, P.E. at Kimley-Horn on October 17, 2023.

61 State Water Resources Control Board (SWRCB). 2023. *2020-2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)*. Website: https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.waterboards.ca.gov%2Fwater_issues%2Fprograms%2Ftmdl%2F2020_2022state_ir_reports_revised_final%2Fapx-a-303d-list.xlsx&wdOrigin=BROWSELINK (accessed September 2022).

62 NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ, NPDES No. CAS000002)

63 United States Environmental Protection Agency (EPA). *National Pollutant Discharge Elimination Systems (NPDES), National Menu of Best Management Practices (BMPs) for Stormwater-Construction.* Website: https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater-construction. (accessed December 4, 2023).

0033, NPDES No. CAS 618033 as amended by Order No. R8-2013-0024 (MS4 Permit). Under the MS4 Permit, priority development projects require preparation of a Water Quality Management Plan (WQMP). Priority development projects include, any "Significant Redevelopment" projects that add or replace 5,000 or more square feet of impervious surface on an already developed site, "New Development" projects that create 10,000 square feet or more of impervious surface, parking lots of 5,000 square feet or more, or other development projects whose site conditions or activity pose the potential for significant adverse impacts to water quality. The MS4 Permit prohibits discharges, sets limits on pollutants being discharged into receiving waters, and requires implementation of technology-based standards. The MS4 Permit requires co-permittees to develop and implement standard design and post-development BMP guidance to guide application of Low Impact Development (LID) BMPs to the maximum extent practicable. The MS4 Permit requires that a Final WQMP be prepared for new development within its jurisdiction. The RCFCWCD prepared and approved the *Design Handbook for Low Impact Development Best Management Practices* (Handbook) in September 2011.[64] The Handbook supplements the Riverside County WQMP by providing guidance for the planning, design, and maintenance of LID BMPs that may be used to mitigate the water quality impacts of developments within Riverside County. The Handbook contains detailed information and designs for seven LID BMPs that are designed to encourage replication of the site's natural hydrologic processes and includes detailed guidance for infiltration testing and basin considerations.

The Final WQMP would specify the Site Design, Source Control, LID, and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff. Design BMPs are stormwater management strategies that emphasize conservation and use of existing site features to reduce the amount of runoff and pollutant loading generated from a site. Source Control BMPs are preventative measures that are implemented to prevent the introduction of pollutants into stormwater. LID BMPs mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff rather than allowing runoff to flow directly to piped or impervious storm drains. Treatment Control BMPs are structural BMPs designed to treat and reduce pollutants in stormwater runoff prior to releasing it to receiving waters.

Construction. The proposed project involves the construction of five public health buildings, short-term living facilities for patients, a future building in the northeast corner of the site, surface parking, landscaping, and walkways. The project site is currently undeveloped and construction activities would result in the disturbance of the entire 19.41-acre project site. Pollutants of concern that would be anticipated during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals typically used during construction activities. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and

[64] Riverside County Flood Control and Water Conservation District (RCFCWCD). 2011. *Design Handbook for Low Impact Development Best Management Practices*. September.

concrete-related waste have the potential to be transported via stormwater runoff into receiving waters if spilled or leaked during construction activities.

Because construction of the proposed project would disturb more than 1 acre of soil, the project is subject to the requirements of the CGP. The proposed project would also be required to comply with Riverside County Ordinance No. 754 and the Riverside County Stormwater/Urban Runoff Management and Discharge Controls Ordinance,[65] which is intended to protect and enhance water quality of Riverside County watercourses, waterbodies, and wetlands, including by reducing pollutants in stormwater discharge to the maximum extent practicable. The purpose of County Ordinance No. 754 is to reduce pollutants in stormwater discharges to the maximum extent, regulate illicit connections and discharges into the storm drain system, and regulate non-stormwater discharges into the storm drain system. Under County Ordinance No. 754, new development would be required to manage stormwater runoff so as to prevent the deterioration of water quality that would impact subsequent or competing uses of the water. BMPs recommended by County Ordinance No. 754 include increasing permeable areas, directing runoff to permeable areas, and maximizing stormwater storage for reuse. As specified in **RCM HYD-1** and **RCM HYD-2,** and as required by the CGP and County Code of Ordinance, the Construction Contractor would be required to prepare a SWPPP and implement construction BMPs detailed in the SWPPP during construction activities. Construction BMPs would include, but are not limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

RCM HYD-1 Prior to the commencement of any land-disturbing activities, the Construction Contractor shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent for coverage under the permit to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTs). The Project Applicant shall provide the Waste Discharge Identification Number (WDID) to the Planning Manager of the Riverside County Planning Department or designee, to demonstrate proof of coverage under the Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the County of Riverside (County), or designee.

A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared by a Qualified SWPPP Developer in accordance with the requirements of the Construction General Permit. These include: BMPs for erosion and sediment control, site management/ housekeeping/waste management, management of non-stormwater discharges,

[65] County of Riverside. 2006. Ordinance No. 857 (as amended through 857.1), An Ordinance of the County of Riverside regarding the Business Storm Water Compliance Program. November 7. Website: https://rivcocob.org/sites/g/files/aldnop311/files/migrated/ords-800-857.pdf (accessed November 1, 2023).

run-on and runoff controls, and BMP inspection/maintenance/repair activities. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association's Stormwater Best Management Handbook: Construction.

The SWPPP shall include a construction site monitoring program that identifies requirements for dry weather visual observations of pollutants at all discharge locations, and as appropriate (depending on the Risk Level), sampling of the site effluent and receiving waters. A Qualified SWPPP Practitioner shall be responsible for implementing the BMPs at the site and performing all required monitoring and inspection/maintenance/repair activities.

Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTs.

RCM HYD-2 During construction activities, the Construction Contractor shall implement BMPs to prevent or reduce the discharge of pollutants directly or indirectly into waters of the United States consistent with the requirements of Riverside County Ordinance No. 754.

According to the Geotechnical Investigation[66] completed for the proposed project, groundwater was not encountered during explorations to depths of 60 feet below the existing grade. The proposed project will require excavation to a maximum depth of 25 feet below the existing grade. Therefore, groundwater dewatering would not be required during construction of the proposed project, and the proposed project will not impact groundwater quality.

With implementation of **RCM HYD-1** and **RCM HYD-2**, which require compliance with the CGP and Riverside County Ordinance No. 754, construction impacts related to surface water quality standards, waste discharge requirements, and groundwater and surface water quality would be **less than significant,** and no mitigation is required.

Operation. Pollutants of concern from long-term operations include pathogens (bacteria/viruses), medical waste, metals, nutrients, motor vehicle lubricants, coolants, disc brake dust, toxic organic compounds, pesticides/herbicides, sediments/total suspended solids, trash and debris, and oil and grease. The proposed project would be required to comply with the requirements of the RCFCWCD, the County of Riverside, and the Incorporated Cities of Riverside County within the Santa Ana Region MS4 Permit Order No. R8-2010-0033, NPDES No. CAS 618033 as amended by Order No. R8-2013-0024 (MS4 Permit), and associated guidance documents. The MS4 Permit requires that a Final WQMP be prepared for new development within its jurisdiction. The Final WQMP would specify the Site Design, Source Control, LID, and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff. Design BMPs are stormwater management strategies that emphasize conservation and use of existing site features to reduce the

[66] Geotechnical Professionals, Inc. (GPI). 2023. *Geotechnical Investigation, Proposed Behavioral Health Campus, Riverside University Health System Perris Wellness Village, NEC Water Street and Harvill Avenue, Perris, California*. November, revised December 20, 2023.

amount of runoff and pollutant loading generated from a site. Source Control BMPs are preventative measures that are implemented to prevent the introduction of pollutants into stormwater. LID BMPs mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff rather than allowing runoff to flow directly to piped or impervious storm drains. Treatment Control BMPs are structural BMPs designed to treat and reduce pollutants in stormwater runoff prior to releasing it to receiving waters. The proposed project includes five drainage management areas and would include the construction of LID BMPs, including six bioretention basins, one modular wetland, and one underground detention basin. The basins and modular wetland would be sized to accommodate the required Design Capture Volume (DCV) for each drainage area. The proposed LID BMPs would capture, filter, and treat stormwater runoff from the project site, primarily by percolation through vegetation within the basins and modular wetland, before discharging into the surrounding storm drain system. The five drainage management areas and proposed LID BMPs would ensure that runoff from the project site would not impact stormwater quality and prevent new or exasperated water quality impairments to receiving waters. Further, the Site Design, Source Control, LID, and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff would ensure that any runoff that infiltrates into groundwater would not result in significant impacts on groundwater quality. As specified in **RCM HYD-3** and as required by the MS4 Permit, prior to the start of any land-disturbing activities, the proposed project would be required to prepare and submit a Final WQMP to the County or designee for review and approval. The Final WQMP would specify the Site Design, Source Control, LID, and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff.

In addition to compliance with the MS4 Permit, the proposed project would be required to comply with Riverside County Ordinance 857, as detailed in **RCM HYD-4**. The purpose of Riverside County Ordinance 857 is to ensure that business owners comply with water quality requirements imposed by Riverside County Ordinance No. 754. The purpose of County Ordinance No. 754 is to reduce pollutants in stormwater discharges to the maximum extent, regulate illicit connections and discharges into the storm drain system, and regulate non-stormwater discharges into the storm drain system. Under County Ordinance No. 754, new development would be required to manage stormwater runoff to prevent the deterioration of water quality that would impact subsequent or competing uses of the water. BMPs recommended by County Ordinance No. 754 include increasing permeable areas, directing runoff to permeable areas, and maximizing stormwater storage for reuse.[67]

The proposed project would increase water usage, which would be partially obtained from groundwater. However, as previously discussed, the 2020 Urban Water Management Plan (2020 UWMP) completed for the EMWD indicates the EMWD has sufficient water supplies to meet water demands through 2045, including during multiple dry years. Additionally, the Groundwater Sustainability Agency (GSA) has developed management actions to ensure that future development will not significantly impact groundwater resources. Natural recharge to the basin is primarily from

[67] County of Riverside. 2006. Ordinance No. 754 (as amended through 754.3), An Ordinance of the County of Riverside Amending Ordinance No. 754 Establishing Stormwater/Urban Runoff Management and Discharge Controls. November 6. Website: https://rivcocob.org/sites/g/files/aldnop311/files/migrated/wp-content-uploads-2020-01-Ordinance-No.-754.3.pdf (accessed November 1, 2023).

percolation of flow in the San Jacinto River and its tributary streams, with some minimal recharge from infiltration of rainfall on the valley floor. Therefore, the project site is not a significant source of groundwater recharge. Because the project site is not a significant source of groundwater recharge and the proposed project would be required to adhere to applicable water quality requirements, as detailed in **RCM HYD-1** through **RCM HYD-4**, operation of the proposed project is not anticipated to violate any groundwater water quality standards or waste discharge requirements.

RCM HYD-3 Prior to issuance of a grading permit, the Applicant shall submit a Final Water Quality Management Plan (WQMP) to the County for review and approval. The project shall implement project design features identified in the Final WQMP. The Final WQMP shall demonstrate that any proposed on-site development plan includes Best Management Practices (BMPs) for Source Control, Pollution Prevention, Site Design, Low Impact Development (LID) implementation, and Structural Treatment Control. BMPs shall be designed and implemented to address 303(d) listed pollutants and retain the project site's minimum design capture volume and hydromodification volume to ensure that post-development stormwater runoff volume or time of concentration does not exceed pre-development stormwater runoff by more than 10 percent of the 2-year peak flow in accordance with the Santa Ana Regional Water Quality Control Board Order No. R8-2010-0033, NPDES Permit No. CAS618033, as amended by Order No. R8-2013-0024 (Municipal Separate Storm Sewer System [MS4] Permit. The proposed LID BMPs specified in the Final WQMP shall be incorporated into the grading and development plans submitted to the County for review and approval. Periodic maintenance of any required BMPs and landscaped areas during project occupancy and operation shall be in accordance with the schedule outlined in the Final WQMP.

RCM HYD-4 Prior to the commencement of any operational business activities, the Applicant shall register with the County's Business Storm Water Compliance Program for stormwater compliance, pursuant to Riverside County Ordinance No. 857.

With implementation of **RCM HYD-3** and **RCM HYD-4**, which require compliance with the MS4 Permit requirements and Riverside County Ordinance No. 857, operation impacts related to a violation of any surface or groundwater water quality standards or waste discharge requirements would be **less than significant**, and no mitigation is required**.**

Overall, because the proposed project would be required to comply with existing regulations including the CGP, the MS4 Permit, and all applicable Riverside County Ordinances, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be **less than significant,** and no mitigation is required.

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?

Less Than Significant Impact. The project site is located within the San Jacinto Groundwater Basin,[68] which underlies San Jacinto, Perris, Moreno, and Menifee Valleys in western Riverside County. Approximately 39 percent of the basin is adjudicated under three separate adjudications, 2 percent of the basin is under the jurisdiction of the federal government, and the remaining 59 percent of the basin lies within the jurisdictional boundaries of the EMWD. The project site is located within the jurisdictional boundaries of the EMWD. The surface area of the basin is approximately 158,500 acres or 248 square miles, with average annual rainfall over the basin ranging from approximately 10 to 12 inches. The basin boundaries are formed by the San Jacinto Mountains on the east, the San Timoteo Badlands on the northeast, the Box Springs Mountains on the north, lower-relief hills on the west (e.g., Gavilan Peak and Steele Peak), and the Santa Rosa Hills and Bell Mountain on the south. The bedrock hills surrounding the basin prevent hydraulic connection with other nearby groundwater basins; therefore, there is no significant groundwater flow between other nearby groundwater basins.[69]

The estimated groundwater storage capacity of the San Jacinto Groundwater Basin is 3,070,000 acre-feet, and in 1975 the calculated groundwater in storage was 2,700,000 acre-feet.[70] EMWD's groundwater model estimates that groundwater in storage increased by an average rate of approximately 15,600 acre-feet per year (AFY) between water years 1985 and 2012.[71] Natural recharge to the basin is primarily from percolation of flow in the San Jacinto River and its tributary streams, with some minimal recharge from infiltration of rainfall on the valley floor. Natural recharge is augmented by the spreading of State Water Project (SWP) and reclaimed water through infiltration ponds in the upper reaches of the San Jacinto River. Percolation of water stored in Lake Perris has been an additional source of recharge since construction of the lake in the 1970s, and reclaimed water percolates through several storage ponds distributed throughout Perris Valley. In some years, artificial recharge exceeds natural recharge, particularly in years with low precipitation.[72]

Construction. As discussed in Section 4.10.a above, the Geotechnical Investigation[73] completed for the proposed project indicates that groundwater was not encountered during explorations to depths of 60 feet below the existing grade. The proposed project will require excavation to a maximum

68 California Department of Water Resources (DWR). n.d. *Groundwater Basin Boundary Assessment Tool.* Website: https://gis.water.ca.gov/app/bbat/ (accessed September 19, 2023).

69 Eastern Municipal Water District (EMWD). 2021. *Groundwater Sustainability Plan for the San Jacinto Groundwater Basin*. September.

70 State Water Resources Control Board (SWRCB), Division of Water Rights (DWR). 2006. *San Jacinto Groundwater Basin Bulletin 118*. January 20.

71 Eastern Municipal Water District (EMWD). 2021. *Groundwater Sustainability Plan for the San Jacinto Groundwater Basin*. September.

72 State Water Resources Control Board (SWRCB), Division of Water Rights (DWR). 2006. *San Jacinto Groundwater Basin Bulletin 118*. January 20.

73 Geotechnical Professionals, Inc. 2023. *Geotechnical Investigation, Proposed Behavioral Health Campus, Riverside University Health System Perris Wellness Village, NEC Water Street and Harvill Avenue, Perris, California*. November, revised December 20, 2023.

depth of 25 feet below the existing grade. Therefore, groundwater dewatering would not be required during construction of the proposed project. As such, impacts related to the decrease of groundwater supplies or interference with groundwater recharge during construction would be **less than significant**, and no mitigation is required.

Operation. Water service for the proposed project would be provided by the EMWD. The EMWD provides potable water and recycled water services to an area of approximately 555 square miles in western Riverside County. The service area includes seven incorporated cities in addition to unincorporated areas of Riverside County, including the project site. EMWD water supplies consist of both local and imported water. Local supplies include groundwater and desalination efforts while imported water is purchased from the Metropolitan Water District of Southern California through its Colorado River Aqueduct and its connections to the State Water Project.[74] Therefore, operation of the proposed project would likely involve the use of both surface and groundwater sources for potable water. The 2020 UWMP indicates the EMWD has sufficient water supplies to meet water demands through 2045, including during multiple dry years. Because the water demand associated with the uses proposed for development of the site was assumed in EMWD's future water demand projections, it is expected the EMWD would rely on existing groundwater entitlements to serve the proposed project's water needs, and implementation of the proposed project would not contribute to a substantial depletion of groundwater supplies. In addition, as discussed in Section 4.19, Utilities and Service Systems, implementation of the proposed project is anticipated to account for approximately 0.1 percent of EMWD's projected water use and less than 0.1 percent of projected water supply for Riverside County for 2045. As such, the proposed project's anticipated water demand would be negligible compared to Riverside County's projected water use and supply, and the County would have sufficient water supply to serve the proposed project as outlined in EMWD's Urban Water Management Plan.

Development of the proposed project would result in an increase in impervious surfaces on the project site from 0 acre to approximately 14.4 acres (approximately 74 percent of the project site), which could decrease on-site infiltration. However, as described above, natural recharge to the groundwater basin is primarily from percolation of flow in the San Jacinto River and its tributary streams, with some minimal recharge from infiltration of rainfall on the valley floor. Therefore, the project site is not a significant source of groundwater recharge.

Because implementation of the proposed project would not contribute to a substantial depletion of groundwater supplies and the project site is not a significant source of groundwater recharge, the proposed project would not result in a significant decrease in groundwater recharge that would result in a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, the proposed project would not interfere substantially with groundwater recharge.

For the reasons listed above, impacts related to the decrease of groundwater supplies or interference with groundwater recharge would be **less than significant,** and no mitigation is required.

[74] Eastern Municipal Water District (EMWD). 2021a. *2020 Eastern Municipal Water District Urban Water Management Plan*. July.

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, 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 that would result in flooding on or off site; (iii) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows?

Under existing conditions, stormwater from the project site sheet flows to an existing catch basin at the corner of Placentia Avenue and Harvill Avenue (the northeast corner of the project site) where it enters storm drains that flow into the San Jacinto River, which discharges into Canyon Lake. Canyon Lake ultimately discharges into Lake Elsinore.[75] With implementation of the proposed project, the project site would be divided into five drainage areas (i.e., DA 1 through DA 5) to manage stormwater runoff. The proposed project would also implement LID BMPs, including six bioretention basins on site, one modular wetland, and one underground detention basin. The five drainage areas are discussed below.

- **DA 1** would manage stormwater runoff from the southwestern corner of the project site that includes the proposed Extended Residential Care building. Stormwater runoff from impervious areas (e.g., concrete, asphalt, and roofs) within DA 1 would be directed to the modular wetland located north of the Extended Residential Care building. Overflows from the modular wetland (stormwater runoff volume that exceeds the storage volume of the modular wetland) would be directed off site via a storm drain pipe and discharged into an existing storm drain pipe in Placentia Avenue.

- **DA 2** would manage stormwater runoff from the western middle portion of the project site, between DA 1 and DA 3, which includes the Supportive Transitional Housing building. Stormwater runoff from impervious areas (e.g., concrete, asphalt, and roofs) within DA 2 would be directed to proposed inlets with storm filters and discharged into two of the six bioretention basins. Flows from the bioretention basins (stormwater runoff volume that exceeds the storage volume of the bioretention basins) would be directed off site via a storm drain pipe and discharged into an existing storm drain pipe in Placentia Avenue.

- **DA 3** would manage stormwater runoff from the northwestern corner of the project site that includes the Urgent Care Services building. Stormwater runoff from impervious areas (e.g., concrete, asphalt, and roofs) within DA 3 would be directed to proposed inlets with storm filters and discharged into three of the six bioretention basins. Flows from the bioretention basins (stormwater runoff volume that exceeds the storage volume of the bioretention basins) would be directed off site via a storm drain pipe and discharged into an existing storm drain pipe in Placentia Avenue.

- **DA 4** would manage stormwater runoff from the southeastern portion of the project site that includes the Children and Youth Services building. Stormwater runoff from impervious areas (e.g., concrete, asphalt, and roofs) within DA 4 would be directed to proposed inlets with storm

[75] Personal communication with Kyle Koivuniemi, P.E. at Kimley-Horn on October 17, 2023.

filters and discharged into two of the six bioretention basins. Flows from the bioretention basins (stormwater runoff volume that exceeds the storage volume of the bioretention basins) would be directed off site via a storm drain pipe and discharged into an existing storm drain pipe in Placentia Avenue.

- **DA 5** would manage stormwater runoff from the northeastern portion of the project site. Stormwater runoff from impervious areas (e.g., concrete, asphalt, and roofs) within DA 5 would be directed to proposed inlets with storm filters and discharged into one of the six bioretention basins or the proposed underground detention basin. Flows from the bioretention basin and the underground detention basin (stormwater runoff volume that exceeds the storage volume of the basins) would be directed off site via a storm drain pipe and discharged into an existing storm drain pipe in Placentia Avenue.

The six bioretention basins, modular wetland, and underground detention basin within discharge areas DA 1 through DA 5 would be designed to store and infiltrate the entire DCV for the project site in accordance with the County's technical guidance for WQMPs. The DCV is the volume of stormwater runoff that requires capture and treatment by stormwater BMPs.

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. Stormwater from the project site currently sheet flows to an existing catch basin at the corner of Placentia Avenue and Harvill Avenue (the northeast corner of the project site). During construction activities, more than 1 acre of soil would be disturbed. During grading and other construction activities, soil would be exposed, drainage patterns would be temporarily altered, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As specified in **RCM HYD-1** and **RCM-HYD-2**, the proposed project would be required to comply with the CGP and applicable County ordinances, which require the preparation of a SWPPP to identify construction BMPs to be implemented during construction of the proposed project to reduce impacts on water quality, including those impacts associated with soil erosion and siltation. BMPs to reduce impacts associated with soil erosion and siltation may include, but are not limited to, the stabilization of soils through the application of mulch, soil binders, and other erosion control mats as well as sediment controls (e.g., silt fences, sediment traps, fiber rolls, gravel bag berms, and storm drain inlet protectors). Compliance with the requirements in the CGP and applicable County ordinances, including implementation of construction BMPs, would ensure that construction impacts related to on- or off-site erosion or siltation would be **less than significant**, and no mitigation is required.

After the completion of project construction, the proposed project would not significantly alter the existing drainage pattern of the site. However, operation of the proposed project would result in an increase in impervious surfaces on the project site from 0 acre to approximately 14.4 acres, which would result in a net increase in stormwater runoff that could lead to downstream erosion in receiving waters. However, as discussed above, the proposed project would be required to prepare a Final WQMP, which would meet water quality treatment and stormwater rate and volume requirements to ensure that the stormwater facilities are not overburdened and continue to convey and maintain water flow and quality in compliance with the MS4 Permit, as specified in **RCM HYD-3**.

With implementation of **RCM HYD-3**, operational impacts related to on- or off-site erosion or siltation would be **less than significant,** and no mitigation is required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Less Than Significant Impact. Project construction would comply with the requirements of the CGP and applicable County ordinances and would include the preparation and implementation of a SWPPP pursuant to **RCM HYD-1**. The SWPPP would include construction BMPs (e.g., soil binders, straw mulch, non-vegetative stabilization, fiber rolls, sandbag barrier, straw bale barrier, stabilized construction entrance/exit, stabilized construction roadway, and entrance/outlet tire wash) to control the rate and amount of on-site surface runoff and to direct flows to ensure that stormwater runoff from the construction site does not result in on- or off-site flooding. With adherence to **RCM HYD-1**, construction impacts related to a substantial increase in the rate or amount of surface runoff that would result in flooding and impede or redirect flood waters would be **less than significant**, and no mitigation is required.

Development of the proposed project would result in an increase in impervious surfaces on the project site from approximately 0 acre to approximately 14.4 acres, which could have the potential to increase the volume and rate of stormwater runoff discharged from the project site. The proposed project would include six on-site bioretention basins, a modular wetland, and an underground detention basin, which would be used for stormwater treatment and peak flow mitigation prior to discharging into the Riverside County storm drain system, in compliance with the requirements of the MS4 Permit, as specified in **RCM HYD-3**. Therefore, with implementation of the requirements of the MS4 Permit, including the implementation of LID techniques to address the volume and rate of stormwater runoff in the post-project condition, the proposed project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site. Impacts would be **less than significant,** and no mitigation is required.

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

Less Than Significant Impact.

Stormwater Drainage System Capacity. Stormwater at the project site would be directed to six on-site bioretention basins, a modular wetland, and an underground detention basin. The modular wetland, bioretention basins, and underground detention basin have been appropriately sized to store and infiltrate the entire DCV for the project site. In addition to addressing the rate and volume of stormwater runoff, the on-site bioretention basins, modular wetland, and underground detention basin would target and reduce pollutants of concern in stormwater runoff.

Therefore, the proposed project would not contribute to an exceedance of existing or planned stormwater drainage systems, and impacts would be **less than significant**. No mitigation is required.

Polluted Runoff. Implementation of BMPs to reduce pollutants of concern in stormwater runoff in compliance with the CGP, MS4 Permit, and applicable County ordinances, as detailed in **RCM HYD-1**

through **RCM HYD-4,** would ensure that the proposed project would result in less than significant impacts related to discharge of polluted runoff during project construction and operations. As detailed in **RCM HYD-1** through **RCM HYD-4,** BMPs for erosion and sediment control, site management/housekeeping/waste management, management of non-stormwater discharges, run-on and runoff controls, and BMP inspection/maintenance/repair activities would be required during construction, and BMPs for Source Control, Pollution Prevention, Site Design, LID implementation, and Structural Treatment Control would be required during operation. Therefore, the proposed project would not contribute additional sources of polluted runoff, and impacts would be **less than significant**. No mitigation is required.

iv. Impede or redirect flood flows?

No Impact. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06065C1430H, the entirety of the project site is located in Zone X, which is identified as an area of minimal flood hazard.[76] The project site is not located within a 100-year floodplain. Therefore, the proposed project would not impede or redirect flood flows, and there would be **no impact**. No mitigation is required.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact.

Flooding. As discussed above, according to FEMA FIRM No. 06065C1430H, the entirety of the project site is located in Zone X, which is identified as an area of minimal flood hazard. During construction, BMPs would be implemented to ensure that during a rain event, pollutants would be retained on site and would be prevented from reaching downstream receiving waters in accordance with **RCM HYD-1** and **RCM HYD-2**. During operation, the proposed project would include six on-site bioretention basins, a modular wetland, and an underground detention basin pursuant to the requirements of **RCM HYD-3**, which would prevent project inundation and ensure that pollutants would be treated and prevented from reaching downstream receiving waters. According to the California Department of Water Resources Division of Safety of Dams, the project site is not located within the dam inundation area.[77] Therefore, the proposed project would not result in the release of pollutants due to flooding cause by a dam failure.

Tsunami. The project site is over 36 miles northeast of the Pacific Ocean. Based on the distance from the Pacific Ocean, the project site is not located in a tsunami hazard zone and would not result in the release of pollutants due to inundation caused by a tsunami.

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[76] Federal Emergency Management Agency (FEMA). 2017. Flood Insurance Rate Map No. 06065C1430H. Map Effective August 18, 2024. Website: https://msc.fema.gov/portal/search?AddressQuery=water%20street%2C%20perris%2C%20California%20 (accessed September 19, 2023).

[77] Department of Water Resources, Division of Safety of Dams. n.d. Dam Breach Inundation Map Web Publisher. Website: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2 (accessed September 19, 2023).

Seiches. Seiches are waves that are created in an enclosed body of water such as a bay, lake, or harbor and go up and down or oscillate and do not progress forward like standard ocean waves. The nearest sizeable, enclosed body of water to the project site is the Perris Reservoir, which is located approximately 3.7 miles northeast of the project site. Because impacts from seiches are very localized and the project site is located miles from enclosed bodies of water, implementation of the proposed project would not result in the release of pollutants due to inundation cause by a seiche.

With implementation of **RCM HYD-1** through **RCM HYD-4**, including the incorporation of six on-site bioretention basins, a modular wetland, and an underground detention basin that would address the volume and rate of post-project stormwater flows, and because the project site is not within a tsunami or seiche zone, implementation of the proposed project would not result in the release of pollutants from a flood, dam inundation, tsunami, or seiche, and impacts would be **less than significant**. No mitigation is required.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The project is within the jurisdiction of the SARWQCB. The SARWQCB adopted a Basin Plan that designates beneficial uses for all surface and groundwater within their jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. As previously discussed, the proposed project would comply with existing NPDES permit requirements, including the CGP and MS4 Permit, and would implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff as detailed in **RCM HYD-1** and **RCM HYD-3**. Compliance with these regulatory requirements would ensure that the proposed project would not degrade or alter water quality, which would cause the receiving waters to exceed the water quality objectives, or impair the beneficial use of receiving waters. As such, the proposed project would not result in water quality impacts that would conflict with the Basin Plan. Construction and operational impacts related to a conflict with the Basin Plan would be **less than significant**, and no mitigation is required.

The Sustainable Groundwater Management Act (SGMA), which was enacted in September 2014, requires governments and water agencies of high- and medium-priority basins to halt overdraft of groundwater basins. The SGMA requires the formation of local Groundwater Sustainability Agencies (GSAs), which are required to adopt Groundwater Sustainability Plans to manage the sustainability of the groundwater basins. The project site is in the San Jacinto Groundwater Basin, which the California Department of Water Resources (DWR) designates as a high priority basin.[78] The GSA identified for the San Jacinto Groundwater Basin is the EMWD.

The San Jacinto Groundwater Sustainability Plan (GSP) Public Draft was finalized in September 2021. The SGMA does not apply to adjudicated basins. Therefore, the sustainability goal and sustainability management criteria defined in the GSP apply only to the Plan Area, which is the non-adjudicated part of the San Jacinto Groundwater Basin, because the remaining areas of the San Jacinto Groundwater Basin are under the oversight of a Court-appointed watermaster. The GSP indicates

78 Eastern Municipal Water District (EMWD). 2021b. *Groundwater Sustainability Plan for the San Jacinto Groundwater Basin*. September.

that groundwater levels within the San Jacinto Groundwater Basin have been rising and that groundwater recharge has likely exceeded groundwater production since the mid-1970s. The sustainability goal for the Plan Area[79] is to manage groundwater resources in a way that facilitates long-term sustainable use of groundwater in the San Jacinto Groundwater Basin.[80] Long-term sustainable management includes:

1. Maintaining sufficient groundwater in storage to allow for ongoing groundwater production that meets the operational demands of groundwater users in the Plan Area.

2. Protecting fresh groundwater resources in the Lakeview and Perris North Groundwater Management Zones (GMZs) to the extent possible by minimizing the northward and eastward migration of brackish groundwater from the Perris South GMZ.

3. Avoiding subsidence related to groundwater production that substantially interferes with surface land uses.

4. Ensuring that groundwater production does not result in significant and unreasonable loss of Groundwater Dependent Ecosystems.

The GSP identifies four projects and three management actions to support implementation efforts of the GSP. Management actions include: (a) adjusting groundwater production as needed to meet water level and/or water quality objectives; (b) imposing a recharge or imported water purchase/ pumping offset fee; and (c) developing a groundwater allocation. Projects include assessing the feasibility of recycled water delivery to private producers in the Menifee production area, conducting additional investigations and/or technical studies, constructing additional dedicated monitoring wells, and determining the location and status of domestic wells in the Plan Area.[81]

As previously discussed, the Geotechnical Investigation[82] completed for the proposed project indicates that groundwater was not encountered during explorations to depths of 60 feet below the existing grade. The proposed project will require excavation to a maximum depth of 25 feet below the existing grade. Therefore, groundwater dewatering would not be required during construction of the proposed project. Therefore, construction of the proposed project would not conflict with or obstruct implementation of the GSP.

The proposed project would increase water use, which would be partially obtained from groundwater. However, as previously discussed, the 2020 UWMP completed for the EMWD indicates the EMWD has sufficient water supplies to meet water demands through 2045, including during

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79 The sustainability goal and sustainability management criteria defined in this GSP apply only to the Plan Area, which is the non-adjudicated part of the San Jacinto Groundwater Basin, because the remaining areas of the basin are under the oversight of a Court-appointed watermaster.

80 Eastern Municipal Water District (EMWD). 2021b. *Groundwater Sustainability Plan for the San Jacinto Groundwater Basin*. September.

81 Ibid.

82 Geotechnical Professionals, Inc. (GPI). 2023. *Geotechnical Investigation, Proposed Behavioral Health Campus, Riverside University Health System Perris Wellness Village, NEC Water Street and Harvill Avenue, Perris, California*. November, revised December 20, 2023.

multiple dry years. Additionally, the GSA has developed management actions to ensure that future development will not significantly impact groundwater resources. As described above, natural recharge to the basin is primarily from percolation of flow in the San Jacinto River and its tributary streams, with some minimal recharge from infiltration of rainfall on the valley floor. Therefore, the project site is not a significant source of groundwater recharge. Nevertheless, the proposed project would include six on-site bioretention basins, a modular wetland, and an underground detention basin that would collect on-site stormwater and be used for stormwater treatment and peak flow mitigation prior to discharging into the Riverside County storm drain system in compliance with the requirements of the MS4 Permit, as detailed in **RCM HYD-3**. For these reasons, the proposed project would not conflict with or obstruct the implementation of a sustainable groundwater management plan. Therefore, construction and operational impacts related to conflict with or obstruction of water quality control plans or sustainable groundwater management plans would be **less than significant,** and no mitigation is required.

4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. 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?	☐	☐	☒	☐

4.11.1 Impact Analysis

a. Would the project physically divide an established community?

No Impact. The physical division of an established community typically refers to the construction of a physical feature (e.g., an interstate or railroad tracks) or removal of a means of access (e.g., a local road or bridge) that would impair mobility within an existing community, or between a community and outlying area. For instance, the construction of an interstate highway or railroad track through an existing community may constrain travel from one side of the community to another; similarly, such construction may also impair travel to areas outside the community.

The 19.41-acre project site is currently undeveloped. Properties adjacent to the project site contain a mix of residential, commercial/industrial land uses and undeveloped land. The project site is located within the boundaries of the Mead Valley Area Plan of the Riverside County General Plan. Commercial/industrial uses and undeveloped land are located to the north and west of the project site, across Placentia Avenue and Harvill Avenue, respectively. Low-density residential uses and undeveloped land are located to the south and west of the project site across Water Street and Tobacco Road, respectively.

The proposed project would establish a series of buildings and residential units creating a Wellness Village in a campus setting. Although implementation of the proposed project would change the existing built environment, it would not change the existing street layout in the area or introduce any new barriers that would impede or alter access to any adjacent uses. The project would provide sidewalks where none exist, and the site plan includes a series of interconnected walkways providing access to buildings and the surrounding built environment. Therefore, the proposed project would not result in the physical division of any established community. **No impact** would occur, and no mitigation is required.

b. 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?

Less Than Significant Impact. The project site is located within the boundaries of the Mead Valley Area Plan of the Riverside County General Plan. The Mead Valley Area Plan guides the physical development and land uses in the unincorporated area of Riverside County west of Perris and is an

extension of the County of Riverside General Plan and Vision Statement. The overall purpose of the Mead Valley Area Plan is to provide comprehensive direction for the development of the plan area while implementing the goals and policies of the General Plan.

The County's General Plan and the Mead Valley Area Plan identify the designated land use for the project site as Business Park (BP) uses. The BP land use designation is intended for employee intensive uses, including research and development, technology centers, corporate office, clean industry, and supporting retail uses. According to the County's Zoning Map, the project site is currently zoned as Manufacturing-Service Commercial (M-SC). The M-SC zoning district is intended to provide for the development of industrial and manufacturing uses, including food, textile, lumber and wood, paper, chemicals, leather, stone, glass, concrete, and metal products as well as machinery, electrical equipment, transportation and related industries, engineering instruments, mining, and kennels and catteries. The M-SC zoning district also allows for service and commercial uses (e.g., retail, office [including medical office], health and exercise centers, vehicle repair shops, and laboratory use). Meat packing plants, cemeteries, distilleries, acid manufacturing, fertilizer production, airports, and solar power are conditionally permitted on the project site. According to the March ARB/IP ALUCP, the project site is also located within the March Joint Air Reserve Base Influence Area, Compatibility Zone C2. Compatibility Zone C2 (the Flight Corridor Zone) prohibits highly noise-sensitive outdoor nonresidential uses and hazards to flight. In addition, Compatibility Zone C2 imposes a maximum intensity of 200 people per acre for nonresidential uses and maximum density of 6.0 dwelling units per acre (du/ac) for residential uses. In addition, airspace review us required for objects taller than 70 feet.[83]

The Wellness Village includes construction of five mixed-use buildings containing a variety of public behavioral health services, on-site parking, short-term housing, a grocery store, and a pharmacy. The campus includes extensive landscaping and community support/amenities. The public behavioral health services will be provided at offices and treatment facilities located in all five buildings. As described above, the M-SC zoning district allows for service and commercial uses, including retail, office (specifically including medical office), health and exercise centers, restaurant and other eating establishments, vehicle repair shops, and laboratory use. The BP land use designation allows for employee-intensive, clean industry, and supporting retail uses. The proposed project is a public health facility and provides for offices, facilities, and areas supporting the conduct of public, institutional, and health activities, with temporary patient living facilities. The proposed project is not subject to the zoning and general plan designations of the project site because the County owns the land and has plenary authority over entitlements and permitting for County-owned property; thus, the uses are allowed at the project site. In addition, the County's authority is further supported by the Behavioral Health Continuum Infrastructure Program (BHCIP) authorizing legislation (California Welfare & Institutions Code § 5960, et seq.), which provides that a project funded by BHCIP grants shall be deemed consistent and in conformity with any applicable local plan, standard, or requirement, and allowed as a permitted use within the zone in which the structure is located, and shall not be subject to a conditional use permit, discretionary permit, or to any other discretionary reviews or approvals. Further, as provided in Policy LU 7.2[84] of the County's General

[83] Riverside County Airport Land Use Commission. 2014. *March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.* November 13.

[84] County of Riverside. 2021. *County of Riverside General Plan, Chapter 3 Land Use Element.* September 28.

Plan, public facilities are allowed in any land use designation except for the Open Space-Conservation and Open Space-Conservation Habitat land use designations. For the purposes of this policy, a public facility shall include all facilities operated by the federal government, the State of California, the County of Riverside, any special district governed by or operating within the County of Riverside or any city, and all facilities operated by any combination of these agencies. Because the proposed project would be operated by the County of Riverside, it meets the definition of "public facility" and is allowed on the project site.

The proposed project does not include the development of highly noise-sensitive outdoor nonresidential uses or hazards to flight. Further, as discussed in Section 4.14, Population and Housing, the proposed project is anticipated to increase the population at the 19.41-acre project site by approximately 1,143 people, including 605 employees and 538 temporary residents (those who would remain at the project site for longer than 30 days). This population increase at the project site would result in an intensity of approximately 59 people per acre. This intensity is consistent with the Compatibility Zone C2 maximum intensity of 200 people per acre for nonresidential use. Compatibility Zone C2 also imposes a maximum density of 6.0 du/ac for residential uses. Using this density, the 19.41 ac project site could accommodate approximately 117 units. According to the United States Census Bureau, the Mead Valley area reported an average of 4.6 persons per household.[85] Using this average, the project site could accommodate approximately 538 residents and be consistent with the maximum density for residential uses within Compatibility Zone C2. Because the proposed project would generate 538 temporary residents at the site, which is the maximum number of residents allowed on the project site based on the maximum density of 6.0 du/ac for residential uses, the proposed project would be consistent with the residential standards within Compatibility Zone C2. In addition, the proposed buildings on the project site would range from one to four stories (approximately 45 feet). Because the proposed project structures would not exceed 70 feet, no additional airspace review is required. As such, the proposed project would be consistent with the March ARB/IP ALUCP.

As previously discussed, the proposed project is subject to the County's land use jurisdiction, including the County's General Plan and the Mead Valley Area Plan, which is an extension of the County's General Plan. Table 4.11.A compares the proposed project to the applicable objectives and policies of the County's General Plan, and Table 4.11.B compares the proposed project to the applicable objectives and policies of the Mead Valley Area Plan.

[85] United States Census Bureau. 2021. American Community Survey 5-Year Estimates retrieved from Census Reporter Profile page for Mead Valley, CA. Website: http://censusreporter.org/profiles/16000US0646646-mead-valley-ca/ (accessed November 30, 2023).

Table 4.11.A: Riverside County General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
Land Use Element	
Countywide Policies	
LU 1.6: Coordinate with local agencies, such as LAFCO, service providers and utilities, to ensure adequate service provision for new development.	**Consistent**. As discussed in Sections 3.15, Public Services, and 3.19, Utilities and Service Systems, the proposed project could be adequately served by existing service providers and utilities. Although existing EMWD-owned sewer infrastructure in the surrounding area does not have the capacity to serve the proposed project, the proposed project would include off-site improvements to existing EMWD sewer infrastructure. The existing 8-inch-diameter sewer lines in Placentia Avenue, Water Street, and along West Frontage Road between Placentia Avenue and Water Street would be replaced with 10-inch-diameter sewer lines that would connect to the existing 10-inch-diameter sewer line in West Frontage Road. No conflict with this policy would occur.
LU 3.1: Accommodate land use development in accordance with the patterns and distribution of use and density depicted on the General Plan Land Use Maps (Figure LU-1) and the Area Plan Land Use Maps in accordance with the following concepts: a. Accommodate communities that provide a balanced mix of land uses, including employment, recreation, shopping, public facilities and housing. b. Assist in and promote the development of infill and underutilized parcels which are located in Community Development areas, as identified on the General Plan Land Use Map. c. Promote parcel consolidation or coordinated planning of adjacent parcels through incentive programs and planning assistance. d. Create street and trail networks that directly connect local destinations, and that are friendly to pedestrians, equestrians, bicyclists, and others using non-motorized forms of transportation. e. Re-plan existing urban cores and specific plans for higher density, compact development as appropriate to achieve the RCIP Vision. f. In new towns, accommodate compact, transit-adaptive infrastructure (based on modified standards that take into account transit system facilities or street network). g. Provide the opportunity to link communities through access to multi-modal transportation systems.	**Consistent**. The County's General Plan and the Mead Valley Area Plan designate the project site as Business Park (BP), which is intended for employee-intensive uses, including research and development, technology centers, corporate office, clean industry, and supporting retail uses. The County's Zoning Map zones the project site as Manufacturing-Service Commercial (M-SC), intending to provide for the development of industrial and manufacturing uses as well as machinery, electrical equipment, transportation and related industries, engineering instruments, mining, and kennels and catteries. The proposed project is a public health facility and provides offices, facilities, and areas supporting the conduct of public, institutional, and health activities as well as temporary patient living facilities. As previously discussed, the proposed project is not subject to the zoning and general plan designations of the project site because the County owns the land and has plenary authority over entitlements and permitting for County-owned property; therefore, the uses are allowed at the project site. The County's authority is further supported by the BHCIP, which provides that a project funded by BHCIP grants shall be deemed consistent and in conformity with any applicable local plan, standard, or requirement, and allowed as a permitted use within the zone in which the structure is located, and shall not be subject to a conditional use permit, discretionary permit, or to any other discretionary reviews or approvals. In addition, as provided in Policy LU 7.2 of the County's General Plan, public facilities are allowed in any land use designation except for the Open Space-Conservation and Open Space-Conservation Habitat land use designations. For the purposes of this policy, a public facility shall include all facilities operated by the federal government, the State of California, the County of Riverside, any special district governed by or operating in any city within Riverside County, and all facilities operated by any combination of these agencies. Because the proposed project would be operated by the County of Riverside, it meets the definition of "public facility" and is allowed on the project site. Implementation of the proposed project would develop the surrounding community with a behavior health campus, employment opportunities, and needed temporary housing, which would further a balanced mix of land uses in the area. In addition, the proposed project would include the construction of a community bicycle/pedestrian trail along the northern and eastern edge of the property that would connect to planned bicycle/pedestrian trails in the surrounding area and would include a bus stop on Harvill Avenue to further enhance the public transportation network. No conflict with this policy would occur.

Table 4.11.A: Riverside County General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
LU 3.3: Promote the development and preservation of unique communities in which each community exhibits a special sense of place and quality of design	**Consistent**. As discussed in Section 4.1, Aesthetics, implementation of the proposed project would be visually consistent to the surrounding development and would not contrast with or substantially impact scenic views from and of the project site. No conflict with this policy would occur.
LU 3.4: Allow techniques, such as incentives or transfer of development credit programs or other mechanisms, to achieve more efficient use of land.	**Consistent**. As previously discussed, the proposed project would utilize BHCIP grants to fund the proposed project. The BHCIP states that a project funded by BHCIP grants shall be deemed consistent and in conformity with any applicable local plan, standard, or requirement, and allowed as a permitted use within the zone in which the structure is located, and shall not be subject to a conditional use permit, discretionary permit, or to any other discretionary reviews or approvals. No conflict with this policy would occur.
LU 4.1: Require that new developments be located and designed to visually enhance, not degrade the character of the surrounding area through consideration of the following concepts: a. Compliance with the design standards of the appropriate area plan land use category. b. Require that structures be constructed in accordance with the requirements of Riverside County's zoning, building, and other pertinent codes and regulations. c. Require that an appropriate landscape plan be submitted and implemented for development projects subject to discretionary review. d. Require that new development utilize drought tolerant landscaping and incorporate adequate drought-conscious irrigation systems. e. Pursue energy efficiency through street configuration, building orientation, and landscaping to capitalize on shading and facilitate solar energy, as provided for in Title 24 Part 6 and/or Part 11, of the California Code of Regulations (CCR). f. Incorporate water conservation techniques, such as groundwater recharge basins, use of porous pavement, drought tolerant landscaping, and water recycling, as appropriate. g. Encourage innovative and creative design concepts. h. Encourage the provision of public art that enhances the community's identity, which may include elements of historical significance and creative use of children's art. i. Include consistent and well-designed signage that is integrated with the building's architectural character. j. Provide safe and convenient vehicular access and reciprocal access between adjacent commercial uses. k. Locate site entries and storage bays to minimize conflicts with adjacent residential neighborhoods. l. Mitigate noise, odor, lighting, and other impacts on surrounding properties. m. Provide and maintain landscaping in open spaces and parking lots.	**Consistent**. As discussed in Section 4.1, Aesthetics, implementation of the proposed project would be visually consistent to the surrounding development and would be designed to visually enhance the area. The proposed project is not subject to the zoning and general plan designations of the project site because the County owns the land, has plenary authority over entitlements and permitting for County-owned property, and the proposed project would be funded by BHCIP grants. The BHCIP provides that a project funded by BHCIP grants shall be deemed consistent and in conformity with any applicable local plan, standard, or requirement, and allowed as a permitted use within the zone in which the structure is located, and shall not be subject to a conditional use permit, discretionary permit, or to any other discretionary reviews or approvals. As such, the proposed project is not subject to the design standards for the BP land use category or the requirements of the M-SC zoning district. Nevertheless, the proposed project would adhere to the noise, odor, lighting, and landscaping requirements of the M-SC zoning district. The proposed project would develop the project site with a succulent garden, a butterfly/hummingbird garden, a meadow garden, and a shade/fern garden, resulting in approximately 180,599 square feet of landscaping (approximately 21% of the project site). In addition, 62,023 square feet of the project site, at the location of the future two-story, 20,000-square-foot administrative/office building, would be irrigated and hydroseeded; however, this landscaped area would be removed with development of the future building and associated parking. Because the proposed project would landscape approximately 21% of the project site, the proposed project would be consistent with the landscaping requirements of the M-SC zoning district. In addition, the proposed project would be designed to meet LEED-NC v4 Silver Standards and would adhere to all applicable CCR Title 24 requirements. The proposed project would also implement LID BMPs, including six bioretention basins, one modular wetland, and one underground detention basin to manage and treat stormwater on the project site. Vehicle access to the project site would be provided via five driveways, including one from Placentia Avenue, two from Harvill Avenue, and two from Water Street. All driveways would be constructed to meet RCFD standards for emergency access. The proposed project would also provide a bicycle/pedestrian trail along the northern and eastern edges of the property that would connect to future bicycle/pedestrian facilities in the area, and a bus stop on Harvill Avenue. As discussed in Section 4.20, Wildfire, although the project site is not located in a VHFHSZ, the project site is located near the eastern edge of a of a VHFHSZ, and therefore has been designed in accordance with the California Building Code and California Fire Code, which include design features such as ignition-resistant materials and incorporation of fire

Table 4.11.A: Riverside County General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
n. Include extensive landscaping. o. Preserve natural features, such as unique natural terrain, arroyos, canyons, and other drainage ways, and native vegetation, wherever possible, particularly where they provide continuity with more extensive regional systems. p. Require that new development be designed to provide adequate space for pedestrian connectivity and access, recreational trails, vehicular access and parking, supporting functions, open space, and other pertinent elements. q. Design parking lots and structures to be functionally and visually integrated and connected. r. Site buildings access points along sidewalks, pedestrian areas, and bicycle routes, and include amenities that encourage pedestrian activity. s. Establish safe and frequent pedestrian crossings. t. Create a human-scale ground floor environment that includes public open areas that separate pedestrian space from auto traffic or where mixed, it does so with special regard to pedestrian safety. u. Recognize open space, including hillsides, arroyos, riparian areas, and other natural features as amenities that add community identity, beauty, recreational opportunities, and monetary value to adjacent developed areas. v. Manage wildland fire hazards in the design of development proposals located adjacent to natural open space.	sprinklers and would minimize risk of exposure of persons or property to wildland fires. In addition, the proposed project would develop an Emergency Action Plan in accordance with the County's EOP and would not substantially impair an adopted emergency response plan or emergency evacuation plan in the event of wildfire. Overall, the proposed project would include innovative and creative design concepts to visually enhance the project site. No conflict with this policy would occur.
LU 4.2: Require property owners to maintain structures and landscaping to a high standard of design, health, and safety through the following: a. Provide proactive code enforcement activities. b. Promote programs and work with local service organizations and educational institutions to inform residential, commercial, and industrial property owners and tenants about property maintenance methods. c. Promote and support community and neighborhood-based efforts for the maintenance, upkeep, and renovation of structures and sites.	**Consistent**. The proposed project would maintain structures and landscaping on site as part of project operations in order to promote a high standard of design, health, and safety. No conflict with this policy would occur.
LU 5.1: Ensure that development does not exceed the ability to adequately provide supporting infrastructure and services, such as libraries, recreational facilities, educational and day care centers, transportation systems, and fire/police/medical services.	**Consistent**. As discussed in Section 4.15, Public Service, the proposed project would be adequately served by fire protection services, police protection services, schools, and other facilities including libraries. As discussed in Section 4.16, Recreation, the proposed project would provide private on-site recreation facilities. In addition, as discussed in Section 4.19, Utilities and Service Systems, the proposed project would be adequately served by existing water, stormwater, electricity, and natural gas infrastructure. Although adjacent existing EMWD-owned sewer infrastructure does not have the capacity to serve the proposed project, development of the proposed project would include sewer line improvements in Placentia Avenue, Water Street, and along West Frontage Road between Placentia Avenue and Water Street. With these improvements, the proposed project would be adequately served by wastewater infrastructure. In addition, as discussed in Section 4.17,

Table 4.11.A: Riverside County General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
	Transportation, implementation of the proposed project is expected to result in less than significant impacts on the surrounding transportation system. No conflict with this policy would occur.
LU 5.2: Monitor the capacities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service.	**Consistent**. Refer to LU 5.1, above. As discussed in Sections 4.15, Public Services, and 4.19, Utilities and Service Systems, the proposed project would not exceed infrastructure capacity or the acceptable levels of service for service providers and utilities. Although existing EMWD-owned adjacent sewer infrastructure does not have the capacity to serve the proposed project, development of the proposed project would require sewer line improvements in Placentia Avenue, Water Street, and along West Frontage Road between Placentia Avenue and Water Street. With these improvements, the proposed project would be adequately served by wastewater infrastructure. No conflict with this policy would occur.
LU 5.3: Review all projects for consistency with individual urban water management plans	**Consistent**. As discussed in Section 4.19, Utilities, EMWD's 2020 Urban Water Management Plan (2020 UWMP) indicates that it has sufficient water supplies to meet water demands through 2045, including during multiple dry years. Based on the anticipated water demand for indoor and outdoor use, the total anticipated water usage at the project site is approximately 56,581,772 gpy, or 174 AFY. This anticipated water usage accounts for approximately 0.1% of the projected water use and less than 0.1% of the projected water supply for the County for 2045. Consequently, the proposed project's anticipated water demand would be negligible compared to the County's projected water use and supply. As such, Riverside County would have sufficient water supply to serve the proposed project, and the proposed project is not anticipated to substantially contribute to the County's projected water demand, as outlined in the 2020 UWMP. No conflict with this policy would occur.
LU 5.4: Ensure that development and conservation land uses do not infringe upon existing essential public facilities and public utility corridors, which include county regional landfills, fee owned rights-of-way and permanent easements, whose true land use is that of public facilities. This policy will ensure that the public facilities designation governs over what otherwise may be inferred by the large-scale general plan maps.	**Consistent**. The project site is currently undeveloped and does not contain any existing public facilities or public utility corridors. In addition, the project site is not considered conservation land. No conflict with this policy would occur.
LU 7.1: Require land uses to develop in accordance with the General Plan and area plans to ensure compatibility and minimize impacts.	**Consistent.** Refer to LU 3.1, above. The proposed project is a public health facility and provides offices, facilities, and areas supporting the conduct of public, institutional, and health activities, as well as temporary patient living facilities. As previously discussed, the proposed project is not subject to the zoning and general plan designations of the project site because the County owns the land and has plenary authority over entitlements and permitting for County-owned property; therefore, the uses are allowed at the project site. The County's authority is further supported by the BHCIP, which provides that a project funded by BHCIP grants shall be deemed consistent and in conformity with any applicable local plan, standard, or requirement, and allowed as a permitted use within the zone in which the structure is located, and shall not be subject to a conditional use permit, discretionary permit, or to any other discretionary reviews or approvals. Nevertheless, as discussed in Section 4.1, Aesthetics, implementation of the proposed project would be visually consistent to the surrounding development. In addition, as discussed throughout this IS/MND, all environmental impacts associated with the proposed project would be less than significant or could be brought to less than significant levels with implementation of mitigation. No conflict with this policy would occur.

Table 4.11.A: Riverside County General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
LU 7.2: Notwithstanding the Public Facilities designation, public facilities shall also be allowed in any other land use designation except for the Open Space-Conservation and Open Space-Conservation Habitat land use designations. For purposes of this policy, a public facility shall include all facilities operated by the federal government, the State of California, the County of Riverside, any special district governed by or operating within the County of Riverside or any city, and all facilities operated by any combination of these agencies.	**Consistent**. Because the proposed project would be operated by the County of Riverside, it meets the definition of "public facility". The project site is designated as Business Park (BP) in the County's General Plan and Mead Valley Area Plan, and M-SC in the County's zoning code. Because the project site is not designated for the Open Space-Conservation or Open Space-Conservation Habitat land use designations and the proposed project meets the definition of "public facility", the proposed project is allowed on the project site. No conflict with this policy would occur.
LU 7.3: Consider the positive characteristics and unique features of the project site and surrounding community during the design and development process.	**Consistent**. The project site is currently vacant and does not contain any features that would be "unique" to the site or area. As discussed in Section 4.1, Aesthetics, the proposed project's landscaping palette would include a mixture of "California-friendly" trees, shrubs, and ground cover to help integrate the new buildings into the existing setting and surrounding area. No conflict with this policy would occur.
LU 7.4: Retain and enhance the integrity of existing residential, employment, agricultural, and open space areas by protecting them from encroachment of land uses that would result in impacts from noise, noxious fumes, glare, shadowing, and traffic.	**Consistent**. The project site is in proximity to existing residential, employment, and open space areas. However, as described in Sections 3.1, Aesthetics, 3.2, Air Quality, 3.13, Noise, and 3.17, Transportation, implementation of the proposed project would not result in significant impacts from noise, noxious fumes, glare, shadowing, and traffic. No conflict with this policy would occur.
LU 8.1: Accommodate the development of a balance of land uses that maintain and enhance Riverside County's fiscal viability, economic diversity, and environmental integrity.	**Consistent**. The proposed project would develop an employee-intensive, behavioral health care campus in an area underserved by mental and behavioral health facilities. Implementation of the proposed project would enhance the County's fiscal viability through the creation of 605 new healthcare jobs on the project site. In addition, as discussed throughout this IS/MND, all environmental impacts associated with the proposed project would be less than significant or could be brought to less than significant levels with implementation of mitigation. No conflict with this policy would occur.
LU 8.2: Promote and market the development of a variety of stable employment and business uses that provide a diversity of employment opportunities.	**Consistent.** The proposed project would develop an employee-intensive, behavioral health care campus in an area underserved by mental and behavioral health facilities. Implementation of the proposed project would promote stable employment and a diversity of employment opportunities through the creation of 605 new healthcare jobs on the project site. No conflict with this policy would occur.
LU 8.3: Promote the development of focused employment centers rather than inefficient strip commercial development.	**Consistent**. The proposed project would develop an employee-intensive, behavioral health care campus that would include a variety of services located on the same site. As such, the proposed project would promote the development of a focused employment center. No conflict with this policy would occur.

Table 4.11.A: Riverside County General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
LU 8.8: Stimulate industrial/business-type clusters that facilitate competitive advantage in the marketplace, provide attractive and well landscaped work environments, and fit with the character of our varied communities.	**Consistent**. The proposed project would develop an employee-intensive, behavioral health care campus at the project site. The proposed project would develop the project site with a succulent garden, a butterfly/hummingbird garden, a meadow garden, and a shade/fern garden, resulting in approximately 180,599 square feet of landscaping (approximately 21% of the project site). In addition, 62,023 square feet of the project site, at the location of the future two-story, 20,000-square-foot administrative/office building, would be irrigated and hydroseeded; however, this landscaped area would be removed with development of the future building and associated parking. In addition, as discussed in Section 4.1, Aesthetics, the proposed project's landscaping palette would include a mixture of "California-friendly" trees, shrubs, and ground cover to help integrate the new buildings into the existing setting and surrounding area, and implementation of the proposed project would be visually consistent to the surrounding development. No conflict with this policy would occur.
LU 8.10: Locate job centers so they have convenient access to Riverside County's multi-modal transportation facilities	**Consistent**. Although no bicycle/pedestrian trails or public transit facilities are located in the immediate vicinity of the project site, the proposed project would include a bicycle/pedestrian trail along the northern and eastern edges of the property as well as a bus stop on Harvill Avenue. As such, the employee-intensive, behavioral health care campus would have convenient access to the County's multi-modal transportation network. No conflict with this policy would occur.
LU 8.12: Improve the relationship and ratio between jobs and housing so that residents have an opportunity to live and work within the county.	**Consistent.** The proposed project would develop an employee-intensive, behavioral health care campus in an area underserved by mental and behavioral health facilities. As such, implementation of the proposed project would provide 605 new healthcare jobs to an area that lacks these types of jobs, thereby creating an opportunity for residents to live and work within the County. No conflict with this policy would occur.
LU 9.2: Require that development protect environmental resources by compliance with the Multipurpose Open Space Element of the General Plan and federal and state regulations such as CEQA, NEPA, the Clean Air Act, and the Clean Water Act.	**Consistent**. As discussed in this table, the proposed project would be consistent with the Multipurpose Open Space Element of the General Plan. In addition, this IS/MND is prepared pursuant to CEQA, and incudes discussion of compliance with the Clean Air Act (in Section 4.2, Air Quality) and the Clean Water Act (in Section 4.10, Hydrology and Water Quality). No conflict with this policy would occur.
LU 9.6: If any area is classified by the State Geologist as an area that contains mineral deposits and is of regional or statewide significance, and Riverside County either has designated that area in its general plan as having important minerals to be protected pursuant to subdivision (a) of Section 2761 of the Surface Mining and Reclamation Act, or has otherwise not yet acted pursuant to subdivision (a), then prior to permitting a use which would threaten the potential to extract minerals in that area, Riverside County shall prepare, in conjunction with its project CEQA documentation, a statement specifying its reason for permitting the proposed use, and shall forward a copy to the State Geologist and the State Mining and Geology Board for review.	**Consistent**. As discussed in Section 4.12, Mineral Resources, the project site is classified as MRZ-3 (significance of mineral deposit undetermined) in the County's General Plan. However, an area classified as MRZ-2 (known or inferred significant mineral resources) is located approximately 0.5 mile southwest from the project site at the Motte-Rimrock Reserve (Reserve). No mineral extraction currently occurs at the project site or the Reserve, and the project site has not be used historically for mineral extraction. The Reserve is part of the University of California, Riverside natural reserve system. The Reserve is conserved land with important archaeological and biological resources and is not available for resource extraction. The County's Open Space-Mineral Resources (OS-MIN) land use designation is used to identify land for mineral extraction and processing facilities on the basis of the SMARA classifications. Areas held in reserve for future mining activities also fall under this designation. Neither the project site nor the surrounding area is designated as OS-MIN, and mineral resources extraction is not a use compatible with the General Plan and zoning designations for the project site or surrounding area. In addition, development of the project site would not preclude use of the Reserve for mineral resource extraction. Therefore, implementation

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	of the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. In addition, implementation of the proposed 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. No conflict with this policy would occur.
LU 9.7: Protect lands designated by the State Mining and Geology Board as being of regional or statewide significance from encroachment of incompatible land uses, such as high-density residential, low-density residential with high values, sensitive public facilities, institutions (e.g., schools, hospitals), etc., by requiring incorporation of buffer zones or visual screening into the incompatible land use.	**Consistent**. Refer to Policy LU 9.6, above. No buffer zones or visual screening would be required at the project site. No conflict with this policy would occur.
LU 11.2: Ensure adequate separation between pollution producing activities and sensitive emission receptors, such as hospitals, residences, childcare centers and schools.	**Consistent**. As discussed in Section 4.3, Air Quality, the nearest sensitive receptor in proximity to the project site are single-family residences approximately 30 feet to the west. Implementation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations as the proposed project would not result in an exceedance of a SCAQMD localized significant threshold during project construction or operation. No conflict with this policy would occur.
LU 11.3: Accommodate the development of community centers and concentrations of development to reduce reliance on the automobile and help improve air quality.	**Consistent**. Implementation of the proposed project would develop the project site with a behavioral health campus that provides a variety of services, including community wellness and education, children and youth services, urgent care services, and supportive transitional housing. These services are offered elsewhere in Riverside County; however, the proposed project would provide these services at one location, thereby reducing the need for patients to travel throughout the county to receive care. Because patients would be able to access a variety of services at one location, the proposed project would reduce the reliance on automobiles and improve air quality in Riverside County. In addition, the proposed project includes the construction of a regional pedestrian/bicycle trail along the northern and eastern edges of the project site and a bus stop on Harvill Avenue. The development of these facilities would further reduce the reliance on automobiles and improve air quality in the County. No conflict with this policy would occur.
LU 11.4: Provide options to the automobile in communities, such as transit, bicycle and pedestrian trails, to help improve air quality.	**Consistent**. The proposed project would include a bicycle/pedestrian trail along the northern and eastern edges of the project site and a bus stop on Harvill Avenue. As such, the proposed project would provide new transit, bicycle and pedestrian trail facilities in the area, and would help improve air quality. No conflict with this policy would occur.
LU 11.5: Ensure that all new developments reduce Greenhouse Gas emissions as prescribed in the Air Quality Element and Climate Action Plan.	**Consistent**. As discussed in Section 4.8, Greenhouse Gas Emissions, a project that accumulates at least 100 points would be consistent with the reduction quantities anticipated in the County's 2019 Climate Action Plan Update (CAP Update). The screening table for GHG Implementation Measures for Commercial Development and Public Facilities was completed for the proposed project, and the proposed project scored 326 total points. Because the proposed project would obtain at least 100 points, it would be consistent with the reduction quantities anticipated in the County's CAP Update. No conflict with this policy would occur.
LU 13.1: Provide land use arrangements that reduce reliance on the automobile and improve opportunities for pedestrian, bicycle, and transit use in order to minimize congestion and air pollution.	**Consistent**. Refer to LU 11.4, above. No conflict with this policy would occur.

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LU 13.4: Incorporate safe and direct multi-modal linkages in the design and development of projects, as appropriate.	**Consistent**. Refer to LU 11.4, above. The proposed bicycle/pedestrian trial would connect to planned bicycle/pedestrian facilities in the area, promoting safe and direct multi-modal linkages. No conflict with this policy would occur.
LU 13.6: Require that adequate and accessible circulation facilities exist to meet the demands of a proposed land use.	**Consistent**. Vehicle access to the project site would be provided via five driveways, including one from Placentia Avenue, two from Harvill Avenue, and two from Water Street. All driveways would be constructed to meet RCFD standards for emergency access. The proposed circulation plan for the project site would meet the demands of the proposed behavior health campus. No conflict with this policy would occur.
LU 14.1: Preserve and protect outstanding scenic vistas and visual features for the enjoyment of the traveling public.	**Consistent** As discussed in Section 4.1, Aesthetics, implementation of the proposed project could partially obscure views of a scenic vista (the Motte-Rimrock Reserve [Reserve] ridgeline located northeast of the project site) from adjacent industrial uses east of the project site, and temporarily obscure views for people traveling along short segments of Harvill Avenue and Placentia Avenue; however, views of this scenic feature would not be obscured by the proposed project from any other perspectives. In addition, although the project site would be distantly visible from the Reserve, implementation of the proposed project would be visually consistent to the surrounding development and would not contrast with or substantially impact scenic views from the Reserve. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista. In addition, the closest eligible State Scenic Highway is the portion of SR-74 west of the Perris, extending from the Perris/Riverside County line to the Elsinore Area Plan area, approximately 2.8 miles south of the project site. The project site is not visible from SR-74 due to intervening development. Therefore, the project will not affect any scenic resources within a State Scenic Highway. No conflict with this policy would occur.
LU 15.2: Review all proposed projects and require consistency with any applicable airport land use compatibility plan as set forth in Appendix I-1 and as summarized in the Area Plan's Airport Influence Area section for the airport in question.	**Consistent**. As previously discussed in this section, the project site is located within the March Joint Air Reserve Base Influence Area, Compatibility Zone C2. Compatibility Zone C2 is the Flight Corridor Zone and prohibits highly noise-sensitive outdoor nonresidential uses and hazards to flight. In addition, Compatibility Zone C2 imposes a maximum intensity of 200 people per acre for nonresidential uses and a maximum density of 6.0 du/ac for residential uses. In addition, airspace review is required for objects taller than 70 feet. The proposed project is anticipated to increase the population at the 19.41-acre project site by approximately 1,143 people. This population increase at the project site would result in an intensity of approximately 59 people per acre. This intensity is consistent with the Compatibility Zone C2 maximum intensity of 200 people per acre for nonresidential use. As discussed above, the proposed project could accommodate approximately 538 temporary residents and be consistent with the maximum density for residential uses within Compatibility Zone C2. Because the proposed project would generate 538 temporary residents at the site, the proposed project would be consistent with the maximum density for residential uses within Compatibility Zone C2. In addition, the proposed buildings on the project site would range from one to four stories (approximately 45 feet). Because the proposed project structures would not exceed 70 feet, no additional airspace review is required. As such, the proposed project would be consistent with the March ARB/IP ALUCP. No conflict with this policy would occur.

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LU 18.1: Ensure compliance with Riverside County's water-efficient landscape policies. Ensure that projects seeking discretionary permits and/or approvals develop and implement landscaping plans prepared in accordance with the Water-Efficient Landscape Ordinance (Ordinance No. 859), the County of Riverside Guide to California Friendly Landscaping and Riverside County's California Friendly Plant List. Ensure that irrigation plans for all new development incorporate weather-based controllers and utilize state-of-the-art water-efficient irrigation components.	**Consistent**. The proposed project would develop the project site with a succulent garden, a butterfly/hummingbird garden, a meadow garden, and a shade/fern garden, resulting in approximately 180,599 square feet of landscaping (approximately 21% of the project site). In addition, 62,023 square feet of the project site, at the location of the future two-story, 20,000-square-foot administrative/office building, would be irrigated and hydroseeded; however, this landscaped area would be removed with development of the future building and associated parking. In order to demonstrate that the proposed landscaping irrigation demand does not exceed the State's Model Water Efficient Landscape Ordinance (MWELO) or the County's Water-Efficient Landscape Ordinance (Ordinance No. 859), the MAWA for the proposed project's outdoor water use (e.g., for landscaping irrigation) was calculated. The MAWA for outdoor water use was determined to be approximately 4,397,086 gpy. The MAWA is the total amount of water usage allowed for landscaping irrigation use based on the project site's evapotranspiration rate, the irrigation efficiency of the proposed irrigation system, and the water-use requirements of the proposed planting material. Based on the anticipated water demand for indoor and outdoor use, the total anticipated water usage at the project site is approximately 56,581,772 gpy, or 174 AFY. This anticipated water usage accounts for approximately 0.1% of the projected water use and less than 0.1% of the projected water supply for Riverside County for 2045. In addition, irrigation plans for the proposed project would incorporate weather-based controllers and utilize state-of-the-art water-efficient irrigation components. No conflict with this policy would occur.
Land Use Designation Policies – Industrial and Business Park Area Plan Land Use Designations	
LU 30.1: Accommodate the continuation of existing and development of new industrial, manufacturing, research and development, and professional offices in areas appropriately designated by General Plan and area plan land use maps.	**Consistent**. The proposed project is a public health facility that provides offices, facilities, and areas supporting the conduct of public, institutional, and health activities, as well as temporary patient living facilities. As previously discussed, the proposed project is not subject to the zoning and general plan designations of the project site because the County owns the land and has plenary authority over entitlements and permitting for County-owned property; therefore, the uses are allowed at the project site. The County's authority is further supported by the BHCIP, which provides that a project funded by BHCIP grants shall be deemed consistent and in conformity with any applicable local plan, standard, or requirement, and allowed as a permitted use within the zone in which the structure is located, and shall not be subject to a conditional use permit, discretionary permit, or to any other discretionary reviews or approvals. The proposed project would conflict with this policy.
LU 30.3: Protect industrial lands from encroachment of incompatible or sensitive uses, such as residential or schools that could be impacted by industrial activity.	**Consistent**. Although the proposed project would include temporary patient living facilities, which is not allowed under the project site's General Plan designation, these facilities would not be typical residential uses because they would be designed to serve patients of the behavioral health campus and would be temporary. In addition, the temporary patient living facilities would not be substantially impacted by industrial activity in the area. No conflict with this policy would occur.

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LU 30.4: Concentrate industrial and business park uses in proximity to transportation facilities and utilities, and along transit corridors.	**Consistent**. The project site is bound by Placentia Avenue to the north, Water Street to the south, and Harvill Avenue to the east, and is located approximately 0.3 mile west of the I-215 transit corridor. Existing utilities are located within the surrounding streets, including Placentia Avenue, Harvill Avenue, and Water Street. Although no existing bicycle/pedestrian or transit facilities are in the immediate surrounding area, the proposed project would include a bicycle/pedestrian trail along the northern and eastern edges of the project site and a bus stop on Harvill Avenue. No conflict with this policy would occur.
LU 30.5: Allow for the inclusion of day care centers, public meeting rooms, and other community-oriented facilities in industrial districts.	**Consistent.** The proposed project would develop the site with a community-oriented behavioral health and wellness campus within an industrial district. No conflict with this policy would occur.
LU 30.7: Require that adequate and available circulation facilities, water resources, and sewer facilities exist to meet the demands of the proposed land use.	**Consistent.** As discussed in Section 4.19, Utilities and Services Systems, and Section 4.17, Transportation, the proposed project would be adequately served by circulation facilities and water resources. Although existing EMWD-owned sewer infrastructure in the surrounding area does not have the capacity to serve the proposed project, the proposed project would include off-site improvements to existing EMWD sewer infrastructure. The existing 8-inch-diameter sewer lines in Placentia Avenue, Water Street, and along West Frontage Road between Placentia Avenue and Water Street would be replaced with 10-inch-diameter sewer lines that would connect to the existing 10-inch-diameter sewer line in West Frontage Road. No conflict with this policy would occur.
Circulation Element	
Planned Circulation Systems	
C 1.4: Encourage and support the development of projects that facilitate and enhance the use of alternative modes of transportation, including pedestrian-oriented retail and activity centers, dedicated bicycle lanes and paths, and mixed-use community centers.	**Consistent**. Refer to LU 11.4. No conflict with this policy would occur.
C 1.8: Ensure that all development applications comply with the California Complete Streets Act of 2008 as set forth in California Government Code Sections 65040.2 and 65302.	**Consistent.** The proposed project would comply with the California Complete Streets Act of 2008 as set forth in California Government Code Sections 65040.2 and 65302 through the development of the proposed bicycle/pedestrian trail along the northern and eastern edges of the project site and the bus stop on Harvill Avenue. No conflict with this policy would occur.
C 2.1: The following minimum target levels of service have been designated for the review of development proposals in the unincorporated areas of Riverside County with respect to transportation impacts on roadways designated in the Riverside County Circulation Plan (Figure C-1) which are currently County maintained, or are intended to be accepted into the County maintained roadway system: a. LOS D shall apply to all development proposals located within any of the following Area Plans: Eastvale, Jurupa, Highgrove, Reche Canyon/Badlands, Lakeview/Nuevo, Sun City/Menifee Valley, Harvest Valley/Winchester, Southwest Area, The Pass, San Jacinto Valley, Western Coachella Valley, and those Community Development Areas of the Elsinore, Lake Mathews/Woodcrest, Mead Valley, and Temescal Canyon Area Plans.	**Consistent**. As discussed in Section 4.17, Transportation, because the project site is located within the Mead Valley area of Riverside County, LOS D has been considered as the LOS threshold for study intersections under the County's jurisdiction. As provided in the Transportation Analysis, restriping the northbound through left to northbound left through right, along with optimizing the signal timing, would eliminate the forecasted operational deficiency. With implementation of these improvements, the resulting LOS at I-215 Northbound Ramps/Placentia Avenue intersection would be LOS D or better, consistent with the County's LOS target standard for study intersections under the County's jurisdiction and the Caltrans LOS standard for State highways and freeway ramps. Pursuant to PRC Section 21099(b)(2), "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestions shall not be considered a significant impact on the environment." Accordingly, the proposed project's contribution towards delays at the I-215 Northbound Ramps/Placentia Avenue intersection do not result in a significant environmental impact. Moreover, the proposed project does not conflict with any General Plan policy concerning

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	LOS because the intersection is projected to operate at a LOS F with or without the project. Further, because the proposed project is being funded with grants under the State's Behavioral Health Continuum Infrastructure Program, "it is deemed consistent and in conformity with any applicable local plan, standard, or requirement" pursuant to Cal. Wel. & Inst. Code, §5960.3. Accordingly, the proposed project's contribution towards the deterioration of LOS at the subject intersection would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Final design plans would be subject to review and approval by County staff prior to issuance of building permits, and adherence to applicable County requirements would ensure the proposed project would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system. No conflict with this policy would occur.
C 2.2: Require that new development prepare a traffic impact analysis as warranted by the Riverside County Traffic Impact Analysis Preparation Guidelines or as approved by the Director of Transportation. Apply level of service targets to new development per the Riverside County Traffic Impact Analysis Preparation Guidelines to evaluate traffic impacts and identify appropriate mitigation measures for new development.	**Consistent.** As discussed, in Section 4.17, Transportation, traffic impacts were analyzed through the preparation of the Transportation Analysis. The report was prepared to satisfy the requirements established in the *Riverside County Transportation Analysis Guidelines for Levels of Service and Vehicle Miles Traveled*, dated December 2020. As discussed in Section 4.17, Transportation, because the project site is located within the Mead Valley area of Riverside County, LOS D has been considered as the LOS threshold for study intersections under the County's jurisdiction. As provided above in C 2.1, the proposed project would not conflict with a program, plan, ordinance, or policy pertaining to transit, bicycle, and pedestrian facilities. In addition, final design plans would be subject to review and approval by County staff prior to the issuance of building permits, and adherence to applicable County requirements would ensure the proposed project would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system. No conflict with this policy would occur.
C 2.4: The direct project related traffic impacts of new development proposals shall be mitigated via conditions of approval requiring the construction of any improvements identified as necessary to meet level of service targets.	**Consistent.** Refer to C 2.1, above. No conflict with this policy would occur.
C 2.5: The cumulative and indirect traffic impacts of development may be mitigated through the payment of various impact mitigation fees such as County of Riverside Development Impact Fees, Road and Bridge Benefit District Fees, and Transportation Uniform Mitigation Fees to the extent that these programs provide funding for the improvement of facilities impacted by development.	**Consistent.** Refer to C 2.1, above. No conflict with this policy would occur.
C 4.1: Provide facilities for the safe movement of pedestrians within developments, as specified in the Riverside County Ordinances Regulating the Division of Land of the County of Riverside.	**Consistent.** The proposed project would include internal pedestrian walkways for the safe movement of pedestrians within the project site. No conflict with this policy would occur.
C 4.3: Assure and facilitate pedestrian access from developments to existing and future transit routes and terminal facilities through project design.	**Consistent**. Refer to LU 13.4, above. No conflict with this policy would occur.
C 4.6: Consult the Riverside County Transportation Department as part of the development review process regarding any development proposals where pedestrian facilities may be warranted. The County of Riverside may require both the dedication and improvement of the pedestrian facilities as a condition of development approval.	**Consistent**. Refer to LU 11.4, above. No conflict with this policy would occur.

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C 4.7: Make reasonable accommodation for safe pedestrian walkways that comply with the Americans with Disabilities Act (ADA) requirements within commercial, office, industrial, mixed use, residential, and recreational developments.	**Consistent**. The proposed project would include internal pedestrian walkways and a pedestrian trail along the northern and eastern edges of the project site. These pedestrian facilities would comply with ADA requirements. No conflict with this policy would occur.
C 4.8: Coordinate with all transit operators to ensure that ADA compliant pedestrian facilities are provided along and/or near all transit routes, whenever feasible. New land developments may be required to provide pedestrian facilities due to existing or future planned transit routes even if demand for pedestrian facility may not be otherwise warranted.	**Consistent**. Refer to C 4.7, above. The proposed pedestrian trail along the northern and eastern edges of the project site would provide access to the proposed bus stop on Harvill Avenue.
C 5.3: Require parking areas of all commercial and industrial land uses that abut residential areas to be buffered and shielded by adequate landscaping.	**Consistent.** The project site is bounded by a small residential parcel to the west. The proposed project would develop the project site with a succulent garden, a butterfly/hummingbird garden, a meadow garden, and a shade/fern garden, resulting in approximately 180,599 square feet of landscaping (approximately 21% of the project site). In addition, 62,023 square feet of the project site, at the location of the future two-story, 20,000-square-foot administrative/office building, would be irrigated and hydroseeded; however, this landscaped area would be removed with development of the future building and associated parking. As such, the residential area to the west would be buffered and shielded from parking areas by landscaping. No conflict with this policy would occur.
C 6.1: Provide dedicated and recorded public access to all parcels of land, except as provided for under the statutes of the State of California.	**Consistent**. As previously discussed, vehicle access to the project site would be provided via five driveways, including one from Placentia Avenue, two from Harvill Avenue, and two from Water Street. No conflict with this policy would occur.
C 6.2: Require all-weather access to all new development	**Consistent.** The five proposed driveways would be designed to allow for all-weather access to the project site. No conflict with this policy would occur.
C 6.3: Limit access points and intersections of streets and highways based upon the road's General Plan classification and function. Require that access points be located so that they comply with Riverside County's minimum intersection spacing standards. Under special circumstances the Transportation Department may consider exceptions to this requirement.	**Consistent.** The proposed vehicle access points would comply with the General Plan classification and function of the surrounding roadways (including Placentia Avenue, Harvill Avenue, and Water Street) and would comply with the County's minimum intersection spacing standards. No conflict with this policy would occur.
C 6.7: Require that the automobile and truck access of commercial and industrial land uses abutting residential parcels be located at the maximum practical distance from the nearest residential parcels to minimize noise impacts.	**Consistent.** The project site is bounded by a small residential parcel to the west, and one of the proposed driveways from Placentia Avenue would abut this parcel. However, the driveway would be located at the maximum practical distance from this parcel in order to minimize noise impacts. Further, as discussed in Section 4.13, Noise, no significant noise impacts would occur during construction or operation of the proposed project. No conflict with this policy would occur.
Public Transportation System	
C 9.2: Support the expansion and enhancement of Metrolink service and transit operators' programs to increase transit usage to implement Bus Rapid Transit (BRT) services, and to make other express and local bus service improvements	**Consistent.** As previously discussed, the proposed project would include the development of a bus stop on Harvill Avenue. As such, implementation of the proposed project would support the expansion and enhancement of public transit in Riverside County. No conflict with this policy would occur.
Non-Motorized Transportation	
C 15.3: Develop a trail system which connects Riverside County parks and recreation areas while providing links to open space areas, equestrian communities, local municipalities, and regional recreational facilities (including	**Consistent.** As previously discussed, the proposed project would include a bicycle/pedestrian trail along the northern and eastern edges of the project site that would connect to the planned trail system in the surrounding area. No conflict with this policy would occur.

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other regional trail systems), and ensure that the system contains a variety of trail loops of varying classifications and degrees of difficulty and length.	
C 15.5: Compliance with the Americans with Disabilities Act (ADA) standards will be assured so as to make trails user-friendly, as much as reasonably feasible.	**Consistent.** Refer to C 4.7, above. No conflict with this policy would occur.
C 16.1: Implement the Riverside County trail system as depicted in the Bikeways and Trails Plan, Figure C-6.	**Consistent.** Figure C-6 depicts Placentia Avenue as planned urban/suburban regional trail. As such, the development of the proposed bicycle/pedestrian trail along the north edge of the project site would result in development of a planned trail as depicted in the Bikeways and Trails Plan. No conflict with this policy would occur.
C 16.4: Require that all development proposals located along a planned trail or trails provide access to, dedicate trail easements or right-of-way, and construct their fair share portion of the trails system. Evaluate the locations of existing and proposed trails within and adjacent to each development proposal and ensure that the appropriate easements are established to preserve planned trail alignments and trail heads. a. Require that all specific plans and other large-scale development proposals include trail networks as part of their circulation systems. b. Ensure that new gated communities, and where feasible, existing gated communities, do not preclude trails accessible to the general public from traversing through their boundaries. c. Provide buffers between streets and trails, and between adjacent residences and trails. d. Make use of already available or already disturbed land where possible for trail alignments. e. Require that existing and proposed trails within Riverside County connect with those in other neighboring city, county, state, and federal jurisdictional areas	**Consistent.** Refer to C 16.1, above. No conflict with this policy would occur.
Scenic Corridors	
C 19.1: Preserve scenic routes that have exceptional or unique visual features in accordance with Caltrans' Scenic Highways Plan.	**Consistent**. The closest eligible State Scenic Highway to the project site is the portion of SR-74 west of Perris, extending from the Perris/Riverside County line to the Elsinore Area Plan area, approximately 2.8 miles south of the project site. The project site is not visible from SR-74 due to intervening development. Therefore, the project will not affect any scenic resources within a State Scenic Highway. No conflict with this policy would occur.
Multipurpose Open Space Element	
Conservation	
OS 2.1: Implement a water-efficient landscape ordinance and corresponding policies that promote the use of water-efficient plants and irrigation technologies, minimizes the use of turf, and reduces water-waste without sacrificing landscape quality	**Consistent**. Refer to LU 18.1, above. No conflict with this policy would occur.

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OS 3.3: Minimize pollutant discharge into storm drainage systems, natural drainages, and aquifers	**Consistent.** As discussed in Section 4.10, Hydrology and Water Quality, the proposed project would be required to comply with the NPDES Construction General Permit, including the preparation of a SWPPP, Riverside County Ordinance Nos. 754 and 857, and the County MS4 Permit, including preparation of a Final WQMP. As such, compliance with existing regulatory requirements would ensure that implementation of the proposed project would not result in significant water quality impacts. No conflict with this policy would occur.
OS 3.4: Review proposed projects to ensure compliance with the National Pollutant Discharge Elimination System (NPDES) Permits and require them to prepare the necessary Stormwater Pollution Prevention Program (SWPPP).	**Consistent.** As discussed in Section 4.10, Hydrology and Water Quality, and detailed in Regulatory Compliance Measures HYD-1 and HYD-3, the proposed project would be required to comply with the NPDES Construction General Permit, including the preparation of a SWPPP, and the County MS4 Permit, including preparation of a Final WQMP. No conflict with this policy would occur.
OS 3.6: Design the necessary stormwater detention basins, recharge basins, water quality basins, or similar water capture facilities to protect water-quality. Such facilities should capture and/or treat water before it enters a watercourse. In general, these facilities should not be placed in watercourses, unless no other feasible options are available.	**Consistent.** As discussed in Section 4.10, Hydrology and Water Quality, the proposed project would also implement LID BMPs, including six bioretention basins, one modular wetland, and one underground detention basin to manage and treat stormwater flows from the project site before discharging flows into the surrounding storm drain system. No conflict with this policy would occur.
OS 11.2: Support and encourage voluntary efforts to provide active and passive solar access opportunities in new developments.	**Consistent**. As part of the proposed project, a 335 kW to 600 kW solar photovoltaic array would be incorporated via the carport roofs, totaling approximately 20,000 square feet of coverage. In addition, spectrally selective low-e glazing has been selected to significantly reduce solar heat gain through the windows, while providing ample daylight and views to the occupants. No conflict with this policy would occur.
OS 11.3: Permit and encourage the use of passive solar devices and other state-of-the-art energy resources.	**Consistent.** Refer to OS 11.2, above. No conflict with this policy would occur.
OS 11.4: Encourage site-planning and building design that maximizes solar energy use/potential in future development applications.	**Consistent.** Refer to OS 11.2, above. No conflict with this policy would occur.
OS 14.2: Restrict incompatible land uses within the impact area of existing or potential surface mining areas.	**Consistent**. As discussed in Section 4.12, Mineral Resources, no existing or potential surface mining operations are proposed for the project site. As such, implementation of the proposed project would not preclude existing or potential surface mining operations. No conflict with this policy would occur.
OS 15.2: Development of renewable resources should be encouraged	**Consistent.** Refer to OS 11.2, above. No conflict with this policy would occur.
OS 16.1: Continue to implement Title 24 of the California Code of Regulations (the "California Building Standards Code") particularly Part 6 (the California Energy Code) and Part 11 (the California Green Building Standards Code), as amended and adopted pursuant to County ordinance. Establish mechanisms and incentives to encourage architects and builders to exceed the energy efficiency standards of within CCR Title 24.	**Consistent.** As discussed in Section 4.6, Energy, the proposed project would be required to adhere to all federal, State, and local requirements for energy efficiency, including current CCR Title 24 and CALGreen Code standards, which establish minimum efficiency standards related to various building features, including appliances, water, and space heating and cooling equipment, building insulation and roofing, and lighting, which would reduce energy usage. In addition, the proposed project would be constructed using energy efficient modern building materials and construction practices, and the proposed project also would use new modern appliances and equipment in accordance with the Appliance Efficiency Regulations (CCR Title 20, Sections 1601 through 1608). The proposed project would also be LEED certified. No conflict with this policy would occur.

Table 4.11.A: Riverside County General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
OS 16.2: Specify energy efficient materials and systems, including shade design technologies, for county buildings.	**Consistent**. Because the proposed project would be County owned, the proposed project would utilize energy efficient materials and systems to reduce energy impacts. The proposed project would be designed to meet LEED-NC v4 Silver Standards, irrigation use would be reduced by over 50% for the site's peak watering month as calculated using the EPA's WaterSense Water Budget Tool, and the landscaping would be metered separately so that water use can be easily tracked. In addition, 5% of all parking spaces would be outfitted with EV charging stations, and an additional 15% of spaces would be EV ready. The buildings would be designed to provide user comfort and enhanced indoor environmental quality while simultaneously maximizing energy efficiency. They will be served by VRF mechanical systems and DOAs. Spectrally selective low-e glazing has been selected to significantly reduce solar heat gain through the windows while still providing ample daylight and views to the occupants. Proposed SRIs would exceed code requirements so that the roofs return the majority of solar energy to the atmosphere rather than allowing it to enter the structures. Plumbing fixtures would be selected to reduce restroom water use and water heating energy by implementing WaterSense-labeled fixtures. Further, residential clothes washers and dishwashers will be EnergyStar certified. In addition, a 335 kW to 600 kW solar photovoltaic array would be incorporated via carport roofs, totaling approximately 20,000 square feet of coverage. Interior materials (e.g., paints, coatings, floorings, ceilings, and acoustical treatments) would be selected to meet the California Department of Public Health requirements as well as SCAQMD VOC limits (where applicable). Many products would also hold Cradle-to-Cradle certifications for their holistic sustainability attributes, or have transparency documentation such as Declare labels, Environmental Product Declarations (EPDs) or Health Product Declarations (HPDs). Indoor air quality will be further supported by air handling units that employ MERV-8 prefilters and MERV-13 final filters to filter outdoor air being supplied to occupied spaces. Further, a minimum of 65% of nonhazardous demolition and construction waste would be recycled or salvaged during construction, and 100% of trees, stumps, rocks and associated vegetation would be collected for reuse. No conflict with this policy would occur.
OS 16.4: Undertake proper maintenance of County physical facilities to ensure that optimum energy conservation is achieved.	**Consistent**. The proposed project would be maintained throughout operations to ensure that optimum energy conservation is achieved. No conflict with this policy would occur.
OS 16.8: Promote coordination of new public facilities with mass transit service and other alternative transportation services, including bicycles, and design structures to enhance mass transit, bicycle, and pedestrian use.	**Consistent**. The proposed project is a public facility and would include a bicycle/pedestrian trail along the northern and eastern edges of the project site and a bus stop on Harvill Avenue in order to promote alternative transportation services and to enhance mass transit, bicycle, and pedestrian use. No conflict with this policy would occur.
OS 16.9: Encourage increased use of passive, solar design and day-lighting in existing and new structures.	**Consistent.** Refer to OS 11.2. No conflict with this policy would occur.
OS 16.14: Coordinate energy conservation activities with the County Climate Action Plan (CAP) as decreasing energy usage also helps reduce carbon emissions.	**Consistent.** Refer to LU 11.5. No conflict with this policy would occur.
Preservation	
OS 18.1: Preserve multi-species habitat resources in the County of Riverside through the enforcement of the provisions of applicable MSHCP's and through implementing related Riverside County policies.	**Consistent**. As discussed in Section 4.4, Biological Resources, the project site is located within the MSHCP area and the SKR HCP fee area; however, it is not within an SKR Reserve. Therefore, focused surveys for SKR will not be required for this project and payment of the appropriate SKR HCP fee would be required as a matter of law. Additionally, the proposed project would be required to pay

Table 4.11.A: Riverside County General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
	MSHCP Local Development Mitigation Fees. Payment of MSHCP Local Development Mitigation Fees provides habitat-based mitigation within the plan area for all wildlife and plant species impacted due to the loss of suitable habitat from covered projects. The proposed project would not conflict with local ordinances or the adopted MSHCP as described in the MSHCP Consistency and Biology Report or the SKR HCP. No conflict with this policy would occur.
OS 19.3: Review proposed development for the possibility of cultural resources and for compliance with the cultural resources program.	**Consistent.** As discussed in Section 4.5, Cultural Resources, potential impacts on cultural resources were analyzed in the Cultural Resources Assessment prepared for the project site. This assessment is consistent with the County's cultural resources program. Although no resources were documented within the project site, at least 69 were recorded within 1 mile, including 60 prehistoric resources, 1 multi-component site, 2 historic-period archaeological resources, and 6 built environment properties. Therefore, due to the density of prehistoric cultural resources in the vicinity of the project site and poor visibility during the survey, there is some potential for impacts to cultural resources. In addition, one resource (LSA-PMB2201A-S-1) was identified on the project site during the field survey. However, based on the four California Register criteria, this resource is not eligible for listing in the California Register. Because of the potential for impacts to cultural resources, MM CUL-1 requiring archaeological monitoring during earthmoving activities is prescribed to ensure impacts would be less than significant. No conflict with this policy would occur.
OS 19.5: Exercise sensitivity and respect for human remains from both prehistoric and historic time periods and comply with all applicable laws concerning such remains.	**Consistent.** As discussed in Section 4.5, Cultural Resources, no known human remains are present on the project site, and there are no facts or evidence to support the idea that Native Americans or people of European descent are buried on the project site. However, as described previously, due to the density of prehistoric cultural resources in the vicinity of the project site and poor visibility during the survey, buried and undiscovered archaeological remains, including human remains, have the potential to be present below the ground surface in portions of the project site. Implementation of Regulatory RCM CUL-1, which requires that work within 50 feet of the discovery be redirected and the County Coroner notified immediately consistent with the requirements of CCR Section 15064.5(e), would ensure less than significant impacts in the event that human remains are encountered on the project site. State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the NAHC, which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the County shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. No conflict with this policy would occur.

Table 4.11.A: Riverside County General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
OS 19.06: Whenever existing information indicates that a site proposed for development has high paleontological sensitivity as shown on Figure OS-8, a paleontological resource impact mitigation program (PRIMP) shall be filed with the County Geologist prior to site grading. The PRIMP shall specify the steps to be taken to mitigate impacts to paleontological resources.	**Consistent.** As discussed in Section 4.7, Geology and Soils, the Very Old Alluvial Fan Deposits located on the project site are considered to have high paleontological sensitivity. As detailed in MM PAL-1, a qualified, professional paleontologist who meets the standards set by the Society of Vertebrate Paleontology shall be retained to develop and implement a PRIMP for this project before commencement of ground-disturbing activities. No conflict with this policy would occur.
OS 21.2: Identify and conserve the skylines, view corridors, and outstanding scenic vistas within Riverside County.	**Consistent.** Refer to LU 14.1. No conflict with this policy would occur.
Safety Element	
Seismic and Geologic Hazards	
S 2.1: Minimize fault rupture hazards through enforcement of Alquist-Priolo Earthquake Fault Zoning Act provisions and the following: a. Require geologic studies or analyses for critical structures, lifelines, high-occupancy, schools, and high-risk structures, within 0.5 miles of all Quaternary to historic faults shown on the Earthquake Fault Studies Zones map. The County geologist shall review and make recommendations based on the results to reduce the potential risk. b. Request geologic trenching studies within all designated Earthquake Fault Studies Zones, unless adequate evidence, as determined by the Riverside County Geologist, is accepted. The County of Riverside may request geologic trenching of non-zoned faults for especially critical or vulnerable structures or lifelines. c. Require that infrastructure systems, such as energy, communications, and transportation infrastructure be designed to resist, without failure to the extent feasible, their crossing of a fault, should fault rupture occur. d. Support efforts by the California Department of Conservation, California Geological Survey, to develop geologic and engineering solutions in areas of ground deformation due to faulting and seismic activity, in those areas where a fault cannot be reliably located. e. Encourage and support efforts by the geologic research community to define better the locations and risks of Riverside County faults. Such efforts could include data sharing and database development with regional entities, other local governments, private organizations, utility agencies or companies, and local universities.	**Consistent.** As discussed in Section 4.7, Geology and Soils, a geotechnical feasibility investigation was prepared for the proposed project and indicated that the project site is not located within an Alquist-Priolo Earthquake Fault Zone and would not conflict with any provisions within the Alquist-Priolo Earthquake Fault Zoning Act. No conflict with this policy would occur.
S 2.2: Request geological and geotechnical investigations in areas with potential for earthquake-induced liquefaction, landslides, or settlement, for any building proposed for human occupancy and any structure whose damage would cause harm, except for accessory structures/buildings, as determined by County officials. Any studies or surveys should be prepared/completed by a state-licensed professional.	**Consistent.** As discussed in Section 4.7, Geology and Soils, a geotechnical feasibility investigation was prepared for the proposed project by a State-licensed professional. The results of the investigation indicated that the project site is not located within an area that has been mapped for liquefaction by the State of California and is characterized by flat topography and is not within an area potentially subject to earthquake-induced landslides. With planned site grading in accordance with SC GEO-1, no significant impacts from landslides, liquefaction, or slope instabilities at the project site are likely to occur. No conflict with this policy would occur.

Table 4.11.A: Riverside County General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
S 2.3: Require that a state-licensed professional investigate the potential for liquefaction in areas designated as underlain by "Susceptible Sediments" and "Shallow Groundwater" for all proposed critical facilities, except for accessory buildings. Any studies must be prepared/completed by a state-licensed professional.	**Consistent.** Refer to S 2.2, above. No conflict with this policy would occur.
S 3.1: All residential, commercial, and industrial structures should be flood-proofed, to the maximum extent possible and as required by law, from the mapped 100-year storm flow, or to an appropriate level determined by site-specific hydrological studies for areas not mapped by the Federal Emergency Management Agency. This may require that the finished floor elevation be constructed at such a height as to meet this requirement. Nonresidential (commercial or industrial) structures may be allowed with a "flood-proofed" finished floor below the Base Flood Elevation (i.e., 100- year flood surface) to the extent permitted by state, federal, and local regulations. New critical facilities should be constructed above-grade to the satisfaction of the Building Official, based on federal, state, or other reliable hydrologic studies. Residential commercial, and industrial structures shall meet these standards as a condition of approval.	**Consistent**. As discussed in Section 4.10, Hydrology and Water Quality, the entirety of the project site is located within an area of minimal flood hazard. As such, impacts related to flooding are expected to be less than significant. Further, the proposed project would adhere to the flood proofing, flood protection requirements, and Flood Management Review requirements of the County. No conflict with this policy would occur.
S 3.6: All projects in unincorporated Riverside County should address and mitigate where applicable, adverse impacts to the carrying capacity of local and regional storm drain systems.	**Consistent**. Refer to OS 3.6, above. With implementation of the LID BMPs, the flow and rate of stormwater would be managed to ensure that no adverse impacts to the carrying capacity of local and regional storm drain systems would occur. No conflict with this policy would occur.
S 3.9: Ensure that new development projects and retrofits to existing large-scale projects incorporate design strategies and features to reduce the area of impervious surfaces.	**Consistent.** Implementation of the proposed project would result in an increase in impervious surfaces on the project site from 0 acre to approximately 14.4 acres (approximately 74% of the project site). The pervious surface area of the project site would include LID BMPs, a succulent garden, a butterfly/hummingbird garden, a meadow garden, and a shade/fern garden, resulting in approximately 180,599 square feet of landscaping (approximately 21% of the project site). In addition, 62,023 square feet of the project site, at the location of the future two story, 20,000-square-foot administrative/office building, would be irrigated and hydroseeded; however, this landscaped area would be removed with development of the future building and associated parking. Although implementation of the proposed project would increase the imperviousness of the project site, landscaping and stormwater management facilities would provide adequate pervious surface area in order to reduce the effect of the new impervious surface area. No conflict with this policy would occur.
S 3.12: Public facilities and other facilities essential for emergencies and large public assembly within the County Regulatory Floodplain as mapped by the Federal Emergency Management Agency shall not be approved unless the project is adequately protected from flood hazards, incorporates all required flood protection specific to that area in accordance with County ordinances and guidelines, as feasible, and will not result in any increase in flood levels during the occurrence of a flood event. Such facilities that are new shall have at least two routes for emergency egress and ingress, and the project design shall minimize	**Consistent.** As discussed in Section 4.10, Hydrology and Water Quality, the entirety of the project site is located within an area of minimal flood hazard. As such, impacts related to flooding are expected to be less than significant. Further, the proposed project would adhere to the flood proofing, flood protection requirements, and Flood Management Review requirements of the County. In addition, the proposed project would develop an Emergency Action Plan in accordance with the County's EOP, which contains information including but not limited to emergency evacuation procedures, a map that shows the location of the building's emergency assembly areas, a building floor plan that shows emergency evacuation routes and the location of emergency

Table 4.11.A: Riverside County General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
the potential for debris or flooding to block emergency routes, either through the construction of dikes, bridges, or large-diameter storm drains under roads used for primary access.	equipment (e.g., fire extinguishers, fire alarm stations, emergency response kits), a list of pertinent safety personnel, including contact information, and department or building-specific emergency response procedure. Further, the proposed project would be designed to include multiple driveways that would allow for exit to what will be the primary evacuation route along Placentia Avenue east across the railroad right-of-way and I-15. On-ramps to I-15 are also located 1.5 miles north at the Cajalco Road/Ramona Expressway intersection and 1.5 miles to the south at the Harvill Avenue/Nuevo Road intersection. Evacuation of the project site would not exceed the capacity of the surrounding roadways such that those residences could not also evacuate the area to the east. In addition, emergency vehicles would not be obstructed from moving west through the project site to respond to a wildfire because Placentia Avenue is a two-way street that would be able to accommodate movement in both directions, including responders moving west and evacuees traveling east. No conflict with this policy would occur.
S 3.16: High-risk facilities should be required to maintain and rehearse inundation response plans.	**Consistent.** The proposed project would develop an Emergency Action Plan in accordance with the County's EOP, which contains information including but not limited to emergency evacuation procedures, a map that shows the location of the building's emergency assembly areas, a building floor plan that shows emergency evacuation routes and the location of emergency equipment (e.g., fire extinguishers, fire alarm stations, emergency response kits), a list of pertinent safety personnel, including contact information, and department or building-specific emergency response procedure. No conflict with this policy would occur.
S 4.8: Locate new critical public facilities outside of High or Very High Fire Hazard Severity Zones or other areas facing elevated risk of wildfire events. Critical facilities include emergency shelters, emergency command and communication facilities, and hospital and healthcare centers. If no feasible alternative site exists, ensure that these facilities incorporate all necessary protections to allow them to continue to serve community needs during and after disaster events.	**Consistent.** The project site and immediate adjacent area is located within a LRA; however, it is not located within a VHFHSZ. The closest SRA Fire Hazard Severity Zones are approximately 0.1 mile west of the project and are classified as a VHFHSZ. In addition, the closest LRA VHFHSZ is approximately 0.2 mile northwest of the project site. Although the project site is not located in a VHFHSZ, the project site is located near the eastern edge of a VHFHSZ, and therefore has been designed to include multiple driveways that would allow for exit to what will be the primary evacuation route along Placentia Avenue east across the railroad right-of-way and I-15, and would develop an Emergency Action Plan in accordance with the County's EOP. No conflict with this policy would occur.
S 4.9: Site all new public facilities in areas outside of identified fire hazard severity zones and wildland-urban interface or fire threat areas, as feasible	**Consistent**. Refer to S 4.8, above. No conflict with this policy would occur.
S 5.8: Ensure that the use and disposal of hazardous materials in the County complies with local, state, and federal safety standards.	**Consistent**. As discussed throughout Section 4.9, Hazards and Hazardous Materials, the transport, disposal, and use of hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations, including the County of Riverside Department of Environmental Health *Underground Storage Tank Guidelines to Closure by Removal*, Chapter 6.5 Division 20 of the Health and Safety Code, and CCR Title 22, Chapter 32, Section 67383.1. No conflict with this policy would occur.
S 7.9: Encourage new developments and existing property owners to incorporate sustainable, energy-efficient, and environmentally regenerative features into their facilities, landscapes, and structures to reduce energy demands and improve on-site resilience. Support financing efforts to increase community access to these features.	**Consistent**. Refer to OS 16.2, above. No conflict with this policy would occur.

Table 4.11.A: Riverside County General Plan Consistency Analysis

<table>
<tr><th>General Plan Policy or Goal</th><th>Project Consistency</th></tr>
<tr><td>S 7.11: Promote and expand the use of drought-tolerant green infrastructure, including street trees and landscaped areas, as part of cooling strategies in public and private spaces.</td><td>Consistent. The proposed project would develop the project site with a succulent garden, a butterfly/hummingbird garden, a meadow garden, and a shade/fern garden, resulting in approximately 180,599 square feet of landscaping (approximately 21% of the project site). In addition, 62,023 square feet of the project site, at the location of the future two-story, 20,000-square-foot administrative/office building, would be irrigated and hydroseeded; however, this landscaped area would be removed with development of the future building and associated parking. In addition, as discussed in Section 4.1, Aesthetics, the proposed project's landscaping palette would include a mixture of "California-friendly" trees, shrubs and ground cover to help integrate the new buildings into the existing setting and surrounding area, and implementation of the proposed project would be visually consistent with the surrounding development. No conflict with this policy would occur.</td></tr>
<tr><td colspan="2">Noise Element</td></tr>
<tr><td colspan="2">Noise Sensitive Land Uses</td></tr>
<tr><td>N 2.3: Mitigate exterior and interior noises to the levels listed in Table N-2 below to the extent feasible, for stationary sources.

Table N-2 Stationary Source Land Use Noise Standards
<table><tr><th>Land Use</th><th>Land Use</th><th>Interior Standards</th><th>Exterior Standards</th></tr><tr><td rowspan="2">Residential</td><td>10:00 PM to 7:00 AM</td><td>40 dBA L_{eq} (10 minutes)</td><td>45 dBA L_{eq} (10 minutes)</td></tr><tr><td>7:00 AM to 10:00 PM</td><td>55 dBA L_{eq} (10 minutes)</td><td>65 dBA L_{eq} (10 minutes)</td></tr></table>dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level</td><td>Consistent. As discussed in Section 4.13, Noise, adjacent off-site land uses would be potentially exposed to stationary-source noise impacts from the proposed on-site HVAC equipment, trash bin emptying activities, truck deliveries, and outdoor activities. However, the SoundPLAN graphic results show that project-generated noise levels will not exceed the residential use daytime and nighttime noise standards of 45 dBA L_{eq} and 65 dBA L_{eq} at the closest sensitive receptor to the west. Therefore, the impact would be less than significant, and no noise reduction measures are required. No conflict with this policy would occur.</td></tr>
<tr><td>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.</td><td>Consistent. Refer to N 2.3, above. No conflict with this policy would occur.</td></tr>
<tr><td>N 4.2: Develop measures to control non-transportation noise impacts.</td><td>Consistent. Refer to N 2.3, above. Because noise impacts would be less than significant, no noise reduction or control measures are required. No conflict with this policy would occur.</td></tr>
<tr><td>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.</td><td>Consistent. Refer to N 2.3, above. Because noise impacts would be less than significant, no noise reduction or control measures are required. No conflict with this policy would occur.</td></tr>
</table>

Table 4.11.A: Riverside County General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
N 7.1: New land use development within Airport Influence Areas shall comply with airport land use noise compatibility criteria contained in the corresponding airport land use compatibility plan for the area. Each Area Plan affected by a public-use airport includes one or more Airport Influence Areas, one for each airport. The applicable noise compatibility criteria are fully set forth in Appendix I-1and summarized in the Policy Area section of the affected Area Plan.	**Consistent.** As discussed in Section 4.13, Noise, the closest airport use to the project site is the March Air Reserve Base/Inland Port Airport (MARB/IPA) located approximately 2.8 miles north. According to the MARB/IPA Land Use Compatibility Plan, the project site located within the Compatibility Zone C2 (Flight Corridor Zone). Single-event noise levels in this area can be intrusive. However, at present, nearly all of the flight training activity takes place on weekdays during daylight hours, thus reducing the significance of the noise impact on sensitive land uses. Furthermore, Perris Valley Airport and Hemet-Ryan Airport are located approximately 3.6 miles south and 14 miles southeast, respectively. Based on Map PV-3 and Map HR-3 of the Riverside County ALUCP and Hemet-Ryan ALUCP, the project site is located beyond the 55 dBA CNEL impact zone from both airports. Therefore, the project would not expose people residing or working in the project area to excessive noise levels, and impact would be less than significant. No conflict with this policy would occur.
N 9.3: Require development that generates increased traffic and subsequent increases in the ambient noise level adjacent to noise-sensitive land uses to provide for appropriate mitigation measures.	**Consistent**. As discussed in Section 4.13, Noise, noise impacts associated with increased traffic would be less than significant. As such, no mitigation measures relating to noise are applicable. No conflict with this policy would occur.
Building and Design	
N 13.1: Minimize the impacts of construction noise on adjacent uses within acceptable practices.	**Consistent**. As discussed in Section 4.13, Noise, while construction noise will vary, it is expected that composite noise levels during construction at the nearest off-site sensitive uses west of the project would reach 69 dBA L_{max}. These predicted noise levels would only occur when all construction equipment is operating simultaneously and therefore are assumed to be rather conservative in nature. While construction-related, short-term noise levels have the potential to be higher than existing ambient noise levels in the project area under existing conditions, the noise impacts would no longer occur once project construction is completed. Although the noise generated by project construction activities would be higher than the ambient noise levels and may result in a temporary increase in the ambient noise levels, construction noise would stop once project construction is completed. Additionally, the project would be required to comply with the construction hours allowed under the County's Code of Ordinances, and best construction practices. Best construction practices include: (a) limiting construction activities to between the hours of 6:00 a.m. and 6:00 p.m. during the months of June through September and between the hours of 6:00 a.m. and 7:00 p.m. during the months of October through May, pursuant to Sections 9.52.020(H) and 9.52.020(I) of the County's Code of Ordinances; (b) equipping all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards; (c) locating equipment staging in areas that will create the greatest distance between construction-related noise sources and the noise-sensitive receptors nearest the project site during all project construction; and (d) placing all stationary construction equipment so that the emitted noise is directed away from the sensitive receptors nearest the project site. No conflict with this policy would occur.

Table 4.11.A: Riverside County General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
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 noise impacts on surrounding areas.	**Consistent**. Refer to N 13.1, above No conflict with this policy would occur.
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.	**Consistent**. Refer to N 13.1, above No conflict with this policy would occur.

Source 1: County of Riverside. 2021. *County of Riverside General Plan, Land Use Element.* September 28.
Source 2: County of Riverside. 2020. *County of Riverside General Plan, Circulation Element.* July 7.
Source 3: County of Riverside. 2015. *County of Riverside General Plan, Multipurpose Open Space Element.* December 8.
Source 4: County of Riverside. 2021. *County of Riverside General Plan, Safety Element.* September 28.
Source 5: County of Riverside. 2015. *County of Riverside General Plan, Noise Element.* December 8.

ADA = Americans with Disabilities Act
AFY = acre-feet per year
ALUCP = Airport Land Use Compatibility Plan
BHCIP = Behavioral Health Continuum Infrastructure Program
BP = Business Park
CALGreen Code = California Green Building Standards Code
California Register = California Register of Historical Resources
Caltrans = California Department of Transportation
CCR = California Code of Regulations
CNEL = Community Noise Equivalent Level
County = County of Riverside
dBA = A-weighted decibels
DOAs = dedicated outdoor air units
du/ac = dwelling units per acre
EMWD = Eastern Municipal Water District
EOP = Emergency Operations Plan
EPA = United States Environmental Protection Agency
EV = electric vehicle
gpy = gallons per year
HVAC = heating, ventilation, and air conditioning
I-15 = Interstate 15
I-215 = Interstate 215
IS/MND = Initial Study/Mitigated Negative Declaration
kW = kilowatts
LAFCO =
LEED = Leadership in Energy and Environmental Design
LEED-NC = Leadership in Energy and Environmental Design – New Construction
L_{eq} = equivalent continuous sound level
LID BMPs = Low Impact Development Best Management Practices
L_{max} = maximum instantaneous noise level
LOS = level of service
LRA = Local Responsibility Area
March ARB/IP = March Air Reserve Base/Inland Port
MAWA = maximum allowed water allowance
MRZ = Mineral Resource Zone
MS4 Permit = Municipal Separate Storm Sewer System Permit
M-SC = Manufacturing-Service Commercial
MSHCP = Western Riverside County Multiple Species Habitat Conservation Plan
NAHC = Native American Heritage Commission
NPDES = National Pollutant Discharge Elimination System
PRC = Public Resources Code
PRIMP = Paleontological Resources Impact Mitigation Program
RCFD = Riverside County Fire Department
RCIP = ???
SCAQMD = South Coast Air Quality Management District
SKR = Stephens' kangaroo rat
SKR HCP = Stephens' Kangaroo Rat Habitat Conservation Plan
SR-74 = State Route 74
SRA = State Responsibility Area
SRIs = solar reflectance indices
SWPPP = Storm Water Pollution Prevention Plan
VHFHSZ = Very High Fire Hazard Severity Zone
VOC = volatile organic compound
VRF = variable refrigerant flow
WQMP = Water Quality Management Plan

Table 4.11.B: Mead Valley Area Plan Consistency Analysis

Mead Valley Area Plan Policy or Goal	Project Consistency
Land Use	
MVAP 2.1: To provide for the orderly development of March Joint Air Reserve Base and the surrounding areas, comply with the 1984 Riverside County Airport Land Use Plan as fully set forth in Appendix L-1 and as summarized in Table 4, as well as any applicable policies related to airports in the Land Use, Circulation, Safety and Noise Elements of the Riverside County General Plan.	**Consistent**. As previously discussed, the population increase at the project site would result in an intensity of approximately 59 people per acre. This intensity is consistent with the Compatibility Zone C2 maximum intensity of 200 people per acre for nonresidential use. In addition, the proposed buildings on the projects site would range from one to four stories (approximately 45 feet) and would not exceed 70 feet. As such, the proposed project would be consistent with the March ARB/IP ALUCP. No conflict with this policy would occur.
MVAP 8.1: Adhere to the lighting requirements specified in Riverside County Ordinance No. 655 for standards that are intended to limit light leakage and spillage that may interfere with the operations of the Mount Palomar Observatory.	**Consistent.** Interior lighting would be designed to prevent direct illumination beyond the building envelope, and all on-site exterior lighting would be shielded and aimed toward specific areas to prevent direct illumination beyond the project site. Low-level exterior lights would also be located along pathways and near buildings to serve security and wayfinding purposes, as well as to accent signage, architectural features, and landscaping features. Because this lighting would be at low-levels, it is not anticipated to cause substantial light that would adversely affect day or nighttime views in the area. In addition, proposed lighting would have specialized optics and glare control to ensure compliance with regulations and guidelines, preventing adverse lighting impact on neighboring properties. Overall, the lighting design of the proposed project would prioritize on-site efficiency while minimizing light trespass, reducing sky-glow, and improving nighttime visibility through glare reduction. The proposed project would be consistent with Riverside County Ordinance No. 655, and no conflict with this policy would occur.
Circulation	
MVAP 9.1: Design and develop the vehicular roadway system per Figure 8, Circulation, and in accordance with the Functional Classifications section in the General Plan Circulation Element.	**Consistent**. The proposed project does not include any off-site improvements to the vehicular roadway system in the surrounding area. Furthermore, implementation of the proposed project would not preclude the design and development of the surrounding vehicular roadway system in accordance with the Functional Classifications section in the General Plan Circulation Element. No conflict with this policy would occur.
MVAP 9.2: Maintain Riverside County's roadway Level of Service standards as described in the Level of Service section of the General Plan Circulation Element.	**Consistent**. Refer to C 2.1, above. No conflict with this policy would occur.

Table 4.11.B: Mead Valley Area Plan Consistency Analysis

Mead Valley Area Plan Policy or Goal	Project Consistency
MVAP 10.1: Maintain and enhance existing railroad facilities in accordance with the Freight Rail section of the General Plan Circulation Element.	**Consistent**. The proposed project does not include any off-site improvements to railroad facilities in the surrounding area. Furthermore, implementation of the proposed project would not preclude the maintenance and enhancement of existing railroad facilities in accordance with the Freight Rail section of the General Plan Circulation Element. No conflict with this policy would occur.
MVAP 11.1: Maintain and improve the trails and bikeways system to reflect Figure 9, Trails and Bikeway System, and as discussed in the Non-motorized Transportation section of the General Plan Circulation Element.	**Consistent**. The proposed project would include a trail along the northern and eastern edge of the project site that would connect with existing and planned trails in the surrounding area. No conflict with this policy would occur.
MVAP 2.1: Protect the scenic highways in the Mead Valley planning area from change that would diminish the aesthetic value of adjacent properties in accordance with the Scenic Corridors sections of the General Plan Land Use, Multipurpose Open Space, and Circulation Elements.	**Consistent**. As discussed in Section 4.1, Aesthetics, the closest eligible State Scenic Highway is the portion of SR-74 west of Perris, extending from the Perris/ Riverside County line to the Elsinore Area Plan area, approximately 2.8 miles south of the project site. The project site is not visible from SR-74 due to intervening development. Therefore, the project will not affect any scenic resources within a State Scenic Highway. No conflict with this policy would occur.
MVAP 14.1: Accommodate the East-West CETAP Corridor in accordance with the General Plan Circulation Element.	**Consistent**. The CETAP was established to evaluate the need and the opportunities for the development of new or expanded transportation corridors in western Riverside County to accommodate increased growth and preserve quality of life. CETAP has identified four priority corridors for the movement of people and goods: Winchester to Temecula Corridor, East-West CETAP Corridor, Moreno Valley to San Bernardino Corridor, and Riverside County-Orange County Corridor. The East-West CETAP Corridor may pass through Mead Valley. The proposed project does not include any off-site improvements to the vehicular roadway system in the surrounding area. Furthermore, implementation of the proposed project would not preclude the development of the East-West CETAP Corridor. No conflict with this policy would occur.
Multipurpose Open Space	
MVAP 15.1: Protect the Santa Ana River watershed, its tributaries, and surrounding habitats, and provide flood protection through adherence to the Floodplain and Riparian Area Management, Wetlands, Multiple Species Habitat Conservation Plans, and Environmentally Sensitive Lands sections of the Multipurpose Open Space Element.	**Consistent**. As discussed in Section 4.10, Hydrology and Water Quality, compliance with applicable regulatory requirements during construction and operation would ensure that implementation of the proposed project would not result in significant water quality impacts. In addition, implementation of the proposed project would not result in increased flood hazard because the entirety of the project site is located in Zone X, area of minimal flood hazard. As discussed in Section 4.4, Biological Resources, the project site is located within the MSHCP area and the SKR HCP fee area; however, it is not within an SKR Reserve. Therefore, focused surveys for SKR will not be required for this project, and payment of the appropriate SKR HCP fee would be required as a matter of

Table 4.11.B: Mead Valley Area Plan Consistency Analysis

Mead Valley Area Plan Policy or Goal	Project Consistency
	law. Additionally, the proposed project would be required to pay MSHCP Local Development Mitigation Fees. Payment of MSHCP Local Development Mitigation Fees provides habitat-based mitigation within the plan area for all wildlife and plant species impacted due to the loss of suitable habitat from covered projects. The proposed project would not conflict with local ordinances or the adopted MSHCP as described in the MSHCP Consistency and Biology Report or the SKR HCP. No conflict with this policy would occur.
MVAP 16.1: Protect viable oak woodlands through adherence to the Oak Tree Management Guidelines adopted by Riverside County.	**Consistent**. The project site is not located within an oak woodland and no oak trees are present on the project site. No conflict with this policy would occur.
MVAP 17.1: Conserve existing intact upland habitat blocks between the Steele Peak Reserve and a portion of the Lake Mathews/Estelle Mountain Reserve located in the Lake Mathews/Woodcrest Area Plan to the west, and between Motte-Rimrock Reserve and Bureau of Land Management (BLM) lands north/northeast of the Steele Peak Reserve, focusing on conservation of coastal sage scrub and annual grassland habitat.	**Consistent.** As discussed in Section 4.4, Biological Resources, the project site does not contain any upland habitat blocks that would be affected during project implementation, including coastal sage scrub and annual grassland habitat. Furthermore, the project site is not located between Steele Peak Reserve and the portion of the Lake Mathews/Estelle Mountain Reserve located in the Lake Mathews/Woodcrest Area Plan or between the Motte-Rimrock Reserve and BLM lands north/northeast of the Steele Peak Reserve. As such, development of the project site would not preclude the conservation of habitat between those areas. No conflict with this policy would occur.
MVAP 17.2: Conserve clay soils in southern needlegrass grasslands and sandy-granitic soils within chaparral and coastal sage scrub habitats capable of supporting Payson's jewelflower and long-spined spineflower, known to exist within the planning area.	**Consistent.** As discussed in Section 4.4, Biological Resources, the project site does not contain any southern needlegrass grasslands, chaparral, or coastal sage scrub habitats capable of supporting Payson's jewelflower and long-spined spineflower. Further, neither Payson's jewelflower nor the long-spined spineflower is known to occur on the project site. No conflict with this policy would occur.
MVAP 17.3: Conserve existing populations of the California gnatcatcher and Bell's sage sparrow in the Mead Valley planning area, including locations at Steele Peak Reserve and undeveloped lands to the north of this reserve and along its eastern fringes.	**Consistent.** As discussed in Section 4.4, Biological Resources, neither the California gnatcatcher nor Bell's sage sparrow is known to occur on the project site. Furthermore, development of the project site would not preclude conservation of existing populations of the California gnatcatcher and Bell's sage sparrow in the Mead Valley planning area. No conflict with this policy would occur.

Table 4.11.B: Mead Valley Area Plan Consistency Analysis

Mead Valley Area Plan Policy or Goal	Project Consistency
MVAP 17.4: Provide for a connection of intact habitat between the North Peak Conservation Bank (located within the Elsinore planning area), the Steele Peak Reserve, and the Lake Mathews/Estelle Mountain Reserve (located within the Lake Mathews/Woodcrest Area Plan).	**Consistent**. The project site is not located between the North Peak Conservation Bank and the Steele Peak Reserve or between the Steele Peak Reserve and the Lake Mathews/Estelle Mountain Reserve. As such, development of the project site would not remove intact habitat between the North Peak Conservation Bank, the Steele Peak Reserve, and the Lake Mathews/Estelle Mountain Reserve. No conflict with this policy would occur.
MVAP 17.5: Conserve vernal pool complexes supporting thread-leaved brodiaea known to exist within Mead Valley.	**Consistent.** As discussed in Section 4.4, Biological Resources, the project site does not contain any vernal pools that would support the thread-leaved brodiaea. As such, development of the project site would not preclude the conservation of vernal pool complexes supporting thread-leaved brodiaea. No conflict with this policy would occur.
MVAP 17.6: Protect sensitive biological resources in Mead Valley Area Plan through adherence to policies found in the Multiple Species Habitat Conservation Plans, Environmentally Sensitive Lands, Wetlands, and Floodplain and Riparian Area Management sections of the General Plan Multipurpose Open Space Element.	**Consistent**. As indicated in Table 4.11.A, above, the proposed project would not conflict with the applicable policies detailed in the General Plan Multipurpose Open Space Element. No conflict with this policy would occur.
Hazards	
MVAP 18.01: Protect life and property from the hazards of flood events through adherence to the policies identified in the Flood and Inundation Hazards Abatement section of the General Plan Safety Element.	**Consistent**. As indicated in Table 4.11.A, above, the proposed project would not conflict with the applicable policies detailed in the General Plan Safety Element. No conflict with this policy would occur.
MVAP 18.2: Adhere to the flood proofing, flood protection requirements, and Flood Management Review requirements of Riverside County.	**Consistent**. As discussed in Section 4.10, Hydrology and Water Quality, the entirety of the project site is located within an area of minimal flood hazard. As such, impacts related to flooding are expected to be less than significant. Further, the proposed project would adhere to the flood proofing, flood protection requirements, and Flood Management Review requirements of the County. No conflict with this policy would occur.
MVAP 18.3: Require that proposed development projects that are subject to flood hazards, surface ponding, high erosion potential or sheet flow be submitted to the Riverside County Flood Control and Water Conservation District for review.	**Consistent**. As discussed in Section 4.10, Hydrology and Water Quality, under existing conditions, stormwater from the project site sheet flows to an existing catch basin at the corner of Placentia Avenue and Harvill Avenue (the northeast corner of the project site) where it enters storm drains. With implementation of the proposed project, the project site would be divided into five drainage areas (i.e., DA 1 through DA 5) to manage stormwater runoff. The proposed project would also implement LID BMPs, including six bioretention basins, one modular wetland, and one underground detention basin in order to treat and manage stormwater flows from the project site. In addition, the entirety of the project site is located within an area of minimal flood hazard. As such, no further review

Table 4.11.B: Mead Valley Area Plan Consistency Analysis

Mead Valley Area Plan Policy or Goal	Project Consistency
	by the Riverside County Flood Control and Water Conservation District would be required. No conflict with this policy would occur.
MVAP 19.1: All proposed development located within High or Very High Fire Hazard Severity Zones shall protect life and property from wildfire hazards through adherence to policies identified in the Fire Hazards (Building Code and Performance Standards), Wind-Related Hazards and General and Long-Range Fire Safety Planning sections of the General Plan Safety Element	**Consistent**. As indicated in Table 4.11.A, above, the proposed project would not conflict with any applicable policies detailed in the General Plan Safety Element. No conflict with this policy would occur.
MVAP 20.1: Protect life and property from seismic-related incidents through adherence to the policies in the Seismic Hazards and Geologic Hazards section of the General Plan Safety Element.	**Consistent**. As indicated in Table 4.11.A, above, the proposed project would not conflict with any applicable policies detailed in the General Plan Safety Element. No conflict with this policy would occur.
MVAP 21.1: Identify ridgelines that provide a significant visual resource for the Mead Valley planning area through adherence to the policies within the Hillside Development and Slope section of the General Plan Land Use Element.	**Consistent**. **Consistent**. As indicated in Table 4.11.A, above, the proposed project would not conflict with any applicable policies detailed in the General Plan Land Use Element related to visual resources. No conflict with this policy would occur.
MVAP 21.2: Protect life and property through adherence to the Hillside Development and Slope policies of the General Plan Land Use Element, the Slope and Instability section of the General Plan Safety Element and policies within the Rural Mountainous and Open Space Land Use Designations of the Land Use Element.	**Consistent**. As indicated in Table 4.11.A, above, the proposed project would not conflict with any applicable policies detailed in the General Plan Land Use Element and Safety Element related to slope hazards. No conflict with this policy would occur.

Source: County of Riverside. 2021. *Mead Valley Area Plan.* September 28.
ALUCP = Airport Land Use Compatibility Plan
BLM = Bureau of Land Management
CETAP = Community and Environmental Transportation Acceptability Process
County = County of Riverside
LID BMPs = Low Impact Development Best Management Practices
March ARB/IP = March Air Reserve Base/Inland Port
MSHCP = Western Riverside County Multiple Species Habitat Conservation Plan
SKR = Stephens' kangaroo rat
SKR HCP = Stephens' Kangaroo Rat Habitat Conservation Plan
State Route 74 = SR-74

The proposed project would generally be consistent with the applicable goals and policies of the County's General Plan and Mead Valley Area Plan as described in Tables 4.11.A and 4.11.B, above. Even if the proposed project may conflict with a distinct policy or goal, the proposed project is nonetheless consistent with the County's General Plan and Mead Area Plan because after considering all aspects of the proposed development, the proposed project would further the objectives and policies of the General Plan without obstructing their attainment. A given project need not be in perfect conformity with every general plan policy to be consistent, which is particularly applicable to vague, general polices that "encourage" actions.

Because the proposed project is not subject to the zoning and general plan designations of the project site due to County ownership and pursuant to the BHCIP and General Plan Policy LU 7.2, the proposed project is statutorily deemed to be consistent and in conformity with any applicable local plan, standard, or requirement. Therefore, the proposed project is consistent with all applicable land use plan, policy, or regulation adopted by the County As detailed throughout this Initial Study/Mitigated Negative Declaration (IS/MND), all impacts to the environment resulting from the proposed project are subject to applicable mitigation and local, State, and/or federal regulations, which would reduce those impacts to less than significant levels. In addition, the proposed project would not conflict with any goals, policies and objectives in the County's General Plan and Mead Valley Area Plan adopted for the purpose of avoiding or mitigation an environmental effect as detailed in Tables 4.11.A and 4.11.B. The proposed project would be consistent with the existing development in the area, including the commercial and light industrial lands uses located in the surrounding area. Therefore, impacts related to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed project adopted for the purpose of avoiding or mitigating an environmental effect are **less than significant**. No mitigation is required.

4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
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?	☐	☐	☒	☐

4.12.1 Impact Analysis

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

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?

Less Than Significant Impact. The Surface Mining and Reclamation Act (SMARA) of 1975 established a land classification system to identify areas that have the potential to generate mineral resources. SMARA's classification system for such lands was established as four Mineral Resource Zones (MRZs) as follows:

- **MRZ-1:** These are areas where the available geologic information indicates no significant mineral deposits or a minimal likelihood of significant mineral deposits.
- **MRZ-2:** These are areas where the available geologic information indicates there are significant mineral deposits or there is a likelihood of significant mineral deposits. However, the significance of the deposit is undetermined.
- **MRZ-3:** These are areas where the available geologic information indicates that mineral deposits are inferred to exist; however, the significance of the deposit is undetermined.
- **MRZ-4:** These are areas where there is not enough information available to determine the presence or absence of mineral deposits.

According to the County's General Plan, the project site and the immediate surrounding area is classified as MRZ-3 (significance of mineral deposit undetermined). However, an area classified as MRZ-2 (known or inferred significant mineral resources) is located approximately 0.5 mile southwest of the project site at the Motte-Rimrock Reserve.[86] No mineral extraction currently occurs at the project site or the Motte-Rimrock Reserve, and the project site has not be used historically for

[86] County of Riverside. 2015. *Riverside County General Plan, Multipurpose Open Space Element, Figure OS-6: Mineral Resource Zones.* December 8.

mineral extraction. The Motte-Rimrock Reserve is part of the University of California, Riverside natural reserve system, is conserved land with important archaeological and biological resources, and is not available for resource extraction.

According to the County's General Plan, Riverside County has extensive deposits of clay, limestone, iron, sand, and aggregates. Mineral deposits in the county are important to many industries, including construction, transportation, and chemical processing. The value of mineral deposits within the county is enhanced by their close proximity to urban areas. The County's Open Space-Mineral Resources (OS-MIN) land use designation is used to identify land for mineral extraction and processing facilities on the basis of the SMARA classifications. Areas held in reserve for future mining activities also fall under this designation.

The project site is currently undeveloped and surrounded by commercial/industrial land uses, undeveloped land, and paved roads, including Interstate 215 (I-215) to the east. According to the Mead Valley Area Plan of the Riverside County General Plan, the project site is designated as Business Park (BP) and zoned as Manufacturing-Service Commercial (M-SC). Table 2.A: On-Site and Adjacent Land Uses, in Chapter 2.0, Project Description, summarizes the existing surrounding land uses, General Plan land use designations, and zoning designations of properties in proximity to the project site. Neither the project site nor the surrounding area is designated as OS-MIN, and mineral resources extraction is not a use compatible with the General Plan and zoning designations for the project site or surrounding area. In addition, development of the project site would not preclude use of the Motte-Rimrock Reserve for mineral resource extraction. Therefore, implementation of the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. In addition, implementation of the proposed 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. Impacts would be **less than significant**, and mitigation is not required.

4.13 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. 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 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?	☐	☐	☒	☐

Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, or sleep. Several noise measurement scales exist that are used to describe noise in a particular location. A decibel (dB) is a unit of measurement that indicates the relative intensity of a sound. Sound levels in decibels are calculated on a logarithmic basis. An increase of 10 dB represents a ten-fold increase in acoustic energy, while 20 dB is 100 times more intense, and 30 dB is 1,000 times more intense. Each 10 dB increase in sound level is perceived as approximately a doubling of loudness; and similarly, each 10 dB decrease in sound level is perceived as half as loud. Sound intensity is normally measured through the A-weighted sound level (dBA), and this scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for 24-hour sound measurements which better represent how humans are more sensitive to sound at night.

As noise spreads from a source, it loses energy so that the farther away the noise receiver is from the noise source, the lower the perceived noise level would be. Geometric spreading causes the sound level to attenuate or be reduced, resulting in a 6 dB reduction[87] in the noise level for each doubling of distance from a single point source of noise to the noise sensitive receptor of concern.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. Equivalent continuous sound level (L_{eq}) is the total sound energy of time varying noise over a sample period. However, the predominant rating scales for human communities in the State of California are the L_{eq}, the Community Noise Equivalent Level (CNEL), and the day-night average noise level (L_{dn}) based on dBA. CNEL is the time varying noise over a 24-hour period, with weighted penalties included during more

[87] Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No. 0123. September. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed January 16, 2020).

noise-sensitive times. A 5 dBA weighting factor is applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and a 10 dBA weighting factor is applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale, but without the adjustment for events occurring during the evening relaxation hours. CNEL and L_{dn} are within 1 dBA of each other and are normally exchangeable.

Regulatory Framework. . The County addresses noise in its General Plan. The goals, objectives, and policies in the County's General Plan are designed to provide noise-compatible land use relationships by establishing noise standards utilized for design and siting purposes and minimizing noise impacts from significant noise generators. The following policies are applicable to the proposed project:

Policy N 2.3: Mitigate exterior and interior noises to the levels listed in Table 3.13.A to the extent feasible for stationary sources.

Table 3.13.A: Stationary Source Land Use Noise Standards

Land Use	Interior Standards	Exterior Standards
Residential		
10:00 p.m. to 7:00 a.m.	40 dBA L_{eq} (10 minutes)	45 dBA L_{eq} (10 minutes)
7:00 a.m. to 10:00 p.m.	55 dBA L_{eq} (10 minutes)	65 dBA L_{eq} (10 minutes)

Source: County of Riverside General Plan Noise Element, Table N-2 (December 2015).
Note: These are only preferred standards; final decision will be made by the Riverside County Planning Department and Office of Public Health.
dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level

Policy N 4.1: Prohibit facility-related noise received by any sensitive use from exceeding the following worst-case noise levels:

- 45 dBA—10-minute L_{eq} between 10:00 p.m. and 7:00 a.m.
- 65 dBA—10-minute L_{eq} between 7:00 a.m. and 10:00 p.m.

Policy N 4.2: Develop measures to control non-transportation noise impacts.

Policy 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.

Policy N 4.4: Require that detailed and independent acoustical studies be conducted for any new or renovated land uses or structures determined to be potential major stationary noise sources.

Policy N 7.1: New land use development within Airport Influence Areas shall comply with airport land use noise compatibility criteria contained in the corresponding airport land use compatibility plan for the area. Each Area Plan affected by a public-use airport includes one or more Airport Influence Areas, one for each airport. The applicable noise compatibility criteria are fully set forth in Appendix I-1 of the General Plan and summarized in the Policy Area section of the affected Area Plan.

Policy N 9.3: Require development that generates increased traffic and subsequent increases in the ambient noise level adjacent to noise-sensitive land uses to provide for appropriate mitigation measures.

Policy N 13.1: Minimize the impacts of construction on adjacent uses within acceptable practices.

Policy 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 noise impacts on surrounding areas.

Policy N 13.4: Require that all construction equipment utilize noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.

Section 9.52.020(H) of the County's Code of Ordinances exempts sound emanating from private construction projects located 0.25 mile or more from an inhabited dwelling. In addition, Section 9.52.020(I) limits the hours of private construction projects located within 0.25 mile from an inhabited dwelling. Construction shall not occur between the hours of 6:00 p.m. and 6:00 a.m. during the months of June through September, or between the hours of 6:00 p.m. and 7:00 a.m. during the months of October through May.

Neither the County's General Plan nor County Ordinance have established numeric maximum acceptable construction source noise levels at potentially affected receivers for CEQA analysis purposes. Therefore, a numerical construction threshold based on the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* is used for analysis of daytime construction impacts, as discussed below. According to the FTA, local noise ordinances are typically not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA L_{eq} as a reasonable threshold for noise sensitive residential land use with a nighttime exterior construction noise level of 70 dBA L_{eq}.

Section 9.52.020(L) of the County's Code of Ordinances exempts sound emanating from heating and air conditioning equipment.

Vibration standards have been developed by the FTA[88] and are used in this analysis to assess potential vibration building damage associated with construction activities. FTA guidelines show that a vibration level of up to 0.5 inch per second (in/sec) in peak particle velocity (PPV) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For non-engineered timber and masonry buildings, the construction building vibration damage criterion is 0.2 in/sec in PPV.

Summary of Significance Criteria. A project would normally have a significant effect on the environment related to noise if it would substantially increase the ambient noise levels for adjoining areas or conflict with the adopted environmental plans and the goals of the community in which the project is located. The following noise level increases were used to determine whether the project would result in a significant noise impact:

- For off-site transportation-related impacts:
    - Where the existing ambient noise level is less than 65 dBA and a project-related permanent increase in ambient noise levels of 3 dBA CNEL or greater occurs.
    - Where the existing ambient noise level is greater than 65 dBA and a project-related permanent increase in ambient noise levels of 1 dBA CNEL or greater occurs.
- For non-transportation-related stationary source impacts, including operations:
    - If current noise levels experienced at the surrounding sensitive uses are less than the hourly daytime noise level standards, then an exceedance of the standards listed in Table 3.13.A would constitute a potentially significant impact.
    - If current noise levels experienced at the surrounding sensitive uses are greater than the hourly daytime noise level standard listed in Table 3.13.A, then a perceptible increase of 3 dBA or more would constitute a potentially significant impact.
- For construction-related impacts:
    - Compliance with the hours established in the City's Municipal Code and exceedance of the FTA noise and vibration standards. (The daytime construction noise level standard is 80 dBA L_{eq} and the construction vibration threshold is 0.2 in/sec PPV.)

[88] Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No. 0123. September. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed January 16, 2020).

Existing Conditions. Certain land uses are considered more sensitive to noise than others. Examples of these include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. The project site is generally surrounded by a mix of commercial, industrial, and residential uses. The closest sensitive receptor is the residence located immediately to the west, adjacent to the project site boundary. This residence was recently acquired as part of an assemblage for a nearby non-residential development project. The residence is not expected to be used for residential occupancy purposes in the future, but is analyzed nevertheless to provide a conservative analysis. Existing noise sources at the project site are primarily associated with traffic on I-215, Placentia Avenue, and surrounding roadways, including Harvill Avenue and Water Street.

Three (3) long-term (96-hour) and one (1) short-term noise level measurements were conducted from September 8, 2023 through September 12, 2023, using three (3) Larson Davis Spark 706RC Dosimeters and a Larson Davis 824. Table 3.13.B provides a summary of the measured hourly noise levels and calculated L_{dn} level from the long-term noise level measurements. As shown in Table 3.13.B, the calculated daily levels range from 55.5 dBA L_{dn} to 72.4 dBA L_{dn}. Hourly noise levels at surrounding sensitive uses are as low as 44.4 dBA L_{eq} and as high as 70.9 dBA L_{eq} during daytime hours. Long-term noise monitoring survey sheets are provided in Appendix G-1. Figure 3.13-1 shows the long-term monitoring locations.

Table 3.13.B: Long-Term 24-Hour Ambient Noise Monitoring Results

Location		Daytime Noise Levels[1] (dBA L_{eq})	Nighttime Noise Levels[2] (dBA L_{eq})	Range of Day-Night Noise Levels (dBA L_{dn})	Average Day-Night Noise Levels (dBA L_{dn})
LT-1	Northeast corner along the border of the project site on a signal light.	58.0–70.0	53.1–68.1	65.4–71.5	68.5
LT-2	Northwest corner along the border of the project site on a utility pole.	53.2–64.0	48.6–63.2	60.5–66.6	63.1
LT-3	Southwest corner along the border of the project site on a tree.	44.4–59.7	44.4–57.4	55.5–61.2	58.2
ST-1[3]	Along the southeast border of the project site near the intersection of Water Street and Harvill Avenue.	55.6–70.9	55.6–68.6	66.7–72.4	69.4

Source: Compiled by LSA (2023).
Note: Noise measurements were conducted from September 8 through September 12, 2023, starting at 1:00 p.m.
[1] Daytime Noise Levels = noise levels from 7:00 a.m. to 10:00 p.m.
[2] Nighttime Noise Levels = noise levels from 10:00 p.m. to 7:00 a.m.
[3] Short-term measurement data estimated based on corresponding long-term.
dBA = A-weighted decibels
L_{dn} = day-night noise level
L_{eq} = equivalent continuous sound level

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LSA

FIGURE 3.13-1

LEGEND

Project Site Boundary

ST-1 Short-term Noise Monitoring Location

LT-1 Long-term Noise Monitoring Location

0 220 440

FEET

SOURCE: Google Earth 2023

I:\PMB2201\G\Noise_Locs.ai (12/11/2023)

Mead Valley Wellness Village Project

Noise Monitoring Locations

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4.13.1 Impact Analysis

a. Would the project result in 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?

Less than Significant Impact.

Construction Noise. Construction of the proposed project would include construction activities that would result in a temporary increase in ambient noise levels in the project site vicinity. Maximum construction noise levels would be short term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of noise impacts generally would be from 1 day to several days depending on the phase of construction. Construction is expected to last approximately 31 months total. The County does not have any quantitative thresholds or standards related to construction noise. The level and types of noise impacts that would occur during construction are described below.

Two types of short-term noise impacts could occur during the construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the site for the proposed project would incrementally increase noise levels on access roads leading to the site. Although there would be a relatively high single-event noise-exposure potential causing intermittent noise nuisance, the effect on longer-term ambient noise levels would be small when compared to existing daily traffic volumes on Placentia Avenue and Harvill Avenue. In addition to heavy truck deliveries, worker, vendor, and hauling trips would occur as part of construction. The highest level of traffic generated during construction would occur when building construction, architectural coating, and utility trenching overlap. The average daily traffic (ADT) of construction activities would be approximately 549 vehicles (466 worker trips and 83 heavy-truck vendor trips). Existing traffic volumes on Placentia Avenue and Harvill Avenue range from 3,920 to 5,180. Due to logarithmic addition, a doubling of traffic volume results in a 3 dBA increase. Because construction-related vehicle trips would not approach existing daily traffic volumes, traffic noise would not increase by 3 dBA L_{dn}. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. The negligible increase of noise caused by construction workers would not be perceptible to the human ear and would not substantially increase existing ambient noise levels. Additionally, construction-related trips are not expected to pass by any sensitive uses between the project site and the nearby freeway. Therefore, short-term construction-related impacts associated with worker commute, heavy-truck vendor trips, and equipment transport to the project site would be **less than significant**. No mitigation measures are required.

The second type of short-term noise impact is related to noise generated during construction, which includes site preparation, grading, building construction, paving, and architectural coating on the project site. Construction is completed in discrete steps, each of which has its own mix of equipment and consequently its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and therefore the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table 3.13.C lists typical construction equipment noise

Table 3.13.C: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor (%)[1]	Maximum Noise Level (L_{max}) at 50 Feet[2]
Auger Drill Rig	20	84
Backhoes	40	80
Compactor (ground)	20	80
Compressor	40	80
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Forklift	20	85
Front-end Loaders	40	80
Graders	40	85
Impact Pile Drivers	20	95
Jackhammers	20	85
Paver	50	77
Pickup Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85
Scrapers	40	85
Tractors	40	84
Trencher	50	80
Welder	40	73

Source: Table 1, *FHWA Roadway Construction Noise Model User's Guide* (FHWA 2006).
Note: Noise levels reported in this table are rounded to the nearest whole number.
[1] Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.
[2] Maximum noise levels were developed based on Specification 721.560 from the Central Artery/ Tunnel program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.
FHWA = Federal Highway Administration
L_{max} = maximum instantaneous sound level

levels recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, taken from the Federal Highway Administration's *FHWA Roadway Construction Noise Model*.[89]

Each piece of construction equipment operates as an individual point source. Using the following equation, a composite noise level can be calculated when multiple sources of noise operate simultaneously:

$$Leq\ (composite) = 10 * \log_{10}\left(\sum_{1}^{n} 10^{\frac{Ln}{10}}\right)$$

[89] Federal Highway Administration (FHWA). 2006. *FHWA Roadway Construction Noise Model User's Guide*, HEP-05-054, DOT-VNTSC-FHWA-05-01. January. Website: https://www.fhwa.dot.gov/ENVIRonment/noise/construction_noise/rcnm/index.cfm (accessed October 25, 2023).

Using the equations from the methodology above, the reference information in Table 3.13.A, and the construction equipment list provided, the composite noise level of each construction phase was calculated. The project construction composite noise levels at a distance of 50 feet would range from 77 to 91 dBA L_{eq} with the highest noise levels occurring during the grading phase.

Once composite noise levels are calculated, reference noise levels can then be adjusted for distance using the following equation:

$$Leq\ (at\ distance\ X) = Leq\ (at\ 50\ feet) - 20 * \log_{10}\left(\frac{X}{50}\right)$$

In general, this equation shows that doubling the distance would decrease noise levels by 6 dBA while halving the distance would increase noise levels by 6 dBA.

Table 3.13.D shows the nearest sensitive uses to the project site, their average distance from construction activities, and composite noise levels expected during construction for the grading phase, which taken together is expected to result in the greatest noise level as compared to other phases. These noise level projections do not take into account intervening topography or barriers. Construction equipment calculations are provided in Appendix G-2.

Table 3.13.D: Potential Construction Noise Impacts at the Nearest Receptor

Receptor (Location)	Composite Noise Level (dBA L_{eq}) at 50 feet	Distance (feet)	Composite Noise Level (dBA L_{eq})
Residences (West)	91	580	69
Industrial (Southeast)		1,030	64
Residences (Southwest)		1,090	64
Industrial (Northeast)		1,090	64

Source: Compiled by LSA (2023).
dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level

While construction noise will vary, it is expected that composite noise levels during construction at the nearest off-site sensitive uses west of the project would be 69 dBA L_{eq}. These predicted noise levels would only occur when all construction equipment is operating simultaneously and would therefore be conservative in nature. A noise level of 69 dBA L_{eq} would also remain below the FTA construction daytime noise level standard of 80 dBA L_{eq}. While construction-related, short-term noise levels have the potential to be higher than existing ambient noise levels in the project area under existing conditions, the noise impacts would no longer occur once project construction is completed.

Additionally, the project would be required to comply with the construction hours allowed under the County's Code of Ordinances, and the best construction practices listed below would minimize construction noise:

- The construction contractor shall limit construction activities to between the hours of 6:00 a.m. and 6:00 p.m. during the months of June through September and between the hours of 6:00 a.m. and 7:00 p.m. during the months of October through May, pursuant to Sections 9.52.020(H) and 9.52.020(I) of the County's Code of Ordinances. Construction is prohibited outside these hours. Should construction occur outside of the specified hours, approval from the County Director would be required.

- During all project site excavation and grading, the project contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.

- The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and the noise-sensitive receptors nearest the project site during all project construction.

- The construction contractor shall place all stationary construction equipment so that the emitted noise is directed away from the sensitive receptors nearest the project site.

- The idling of construction equipment shall be limited to the extent feasible, specifically when located near sensitive uses.

Therefore, noise impacts from construction activities would be **less than significant**. No noise reduction measures are required.

Long-Term Mobile Noise. Traffic noise is the primary noise source in the vicinity of the project site. Other sources of noise in the area surrounding the project site would be low or intermittent and would not contribute to or reach the levels of noise generated by traffic. The FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) was used to evaluate highway traffic-related noise conditions along roadway segments in the project site vicinity. This model requires various parameters, including traffic volumes, vehicle mix, vehicle speed, and roadway geometry to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resultant noise levels are weighted and summed over 24-hour periods to determine the L_{dn} values.

The without and with project scenario traffic volumes were obtained from the Transportation Analysis prepared for the proposed project and provide in Appendix H. Appendix G-3 provides the specific assumptions used in developing these noise levels and model printouts. Table 3.13.E shows an increase of 11.5 dBA on Water Street west of Harvill Avenue. This increased noise level is due to Water Street being a lightly trafficked dirt road. Although this could constitute a significant increase in noise, there are no sensitive uses in the vicinity of the road segment. Furthermore, the result of 53.3 dBA L_{dn} is well below the standard of 65 dBA L_{dn}. For all other road segments in the vicinity of the project site, Table 3.13.E shows that the increase in project-related traffic noise would be no greater than 1.6 dBA. Noise level increases less than 3.0 dBA are not perceptible to the human ear. Therefore, traffic noise impacts from project-related traffic on off-site sensitive receptors would not cause a substantial increase in ambient noise beyond applicable standards. As such, impacts would be less than significant, and no mitigation measures are required.

Table 3.13.E: Traffic Noise Levels Without and With Proposed Project

Roadway Segment	Existing		Existing With Project			Opening Year 2027 Without Project		Opening Year 2027 With Project		
	ADT	L_{dn} (dBA) 50 ft from Centerline of Nearest Lane	ADT	L_{dn} (dBA) 50 ft from Centerline of Nearest Lane	Increase from Existing Conditions (dBA)	ADT	L_{dn} (dBA) 50 ft from Centerline of Nearest Lane	ADT	L_{dn} (dBA) 50 ft from Centerline of Nearest Lane	Increase from Existing Conditions (dBA)
Placentia Avenue West of Harvill Avenue	3,920	60.7	4,380	61.2	0.5	4,220	61.0	4,680	61.5	0.5
Placentia Avenue East of Harvill Avenue	4,340	60.1	6,260	61.7	1.6	4,670	60.4	6,590	61.9	1.5
Harvill Avenue North of Placentia	8,150	62.8	8,530	63.0	0.2	8,800	63.2	9,180	63.4	0.2
Harvill Avenue South of Placentia	5,180	60.9	6,010	61.5	0.6	5,580	61.2	6,860	62.1	0.9
Harvill Avenue South of Water Street	4,990	60.7	5,240	60.9	0.2	5,380	61.0	6,080	61.6	0.6
Water Street East of Harvill Avenue	290	48.7	290	48.7	0.0	300	48.8	300	48.8	0.0
Water Street West of Harvill Avenue	60	41.8	840	53.3	11.5	60	41.8	840	53.3	11.5

Source: Compiled by LSA (2023).
Note: Shaded cells indicate roadway segments adjacent to the project site.
ADT = average daily traffic
L_{dn} = day-night noise level
dBA = A-weighted decibels
ft = foot/feet

Long-Term Off-Site Stationary Noise. Adjacent off-site land uses would be potentially exposed to stationary-source noise impacts from on-site heating, ventilation, and air conditioning (HVAC) equipment, trash bin emptying activities, truck deliveries, and outdoor activities proposed as part of the project. The potential noise impacts to off-site sensitive land uses from the proposed operations are discussed below. HVAC equipment could run continuously for the duration of a 24-hour period, and trash activities are expected to occur no more than once a day at each location. It should be noted that HVAC operations are specifically exempt from the Municipal Code noise standards; however, to assess the overall impact of project operations, they have been included in the noise analysis below. Operations from activities such as ambulances are also specifically exempt from the Municipal Code but are not included in the assessment below due to the irregular nature of the potential impacts and the emergency nature associated with the noise generated. To determine the future noise impacts from project operations to the noise sensitive uses, a 3-D noise model (SoundPLAN) was used to incorporate the site topography as well as the shielding from the proposed building on site. A graphic representation of the operational noise impacts is presented in Appendix G-4.

The project is estimated to have 29 rooftop HVAC units on the proposed buildings to provide ventilation to the proposed interior uses. The HVAC equipment could operate 24 hours per day and would generate sound power levels (SPLs) of up to 87 dBA SPL or 72 dBA L_{eq} at 5 feet, based on manufacturer's data.[90]

The project is estimated to have four (4) dumpsters near the corners of the proposed buildings of the project site. The trash emptying activities would occur for a period of less than 1 minute on a given day and would generate SPLs of up to 118.6 dBA SPL or 84 dBA L_{eq} at 50 feet, based on reference information within SoundPLAN.

Noise levels generated by delivery trucks would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA L_{eq} at 20 feet based on measurements taken by LSA.[91]

The SoundPLAN graphic results show that when the abovementioned sources operate at their expected locations, project-generated noise levels will not exceed the County's Municipal Code residential use daytime and nighttime noise standards of 65 dBA L_{eq} and 45 dBA L_{eq}, respectively, at the closest sensitive receptor to the west. Therefore, the impact would be **less than significant**, and no noise reduction measures are required.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact. A vibration level of 94 vibration velocity decibels (VdB) (0.2 PPV in/sec) is the threshold used to evaluate construction vibration impacts because this vibration level has the

[90] Trane. Fan Performance – Product Specifications RT-PRC023AU-EN.

[91] LSA Associates, Inc. 2016. *Operational Noise Impact Analysis for Richmond Wholesale Meat Distribution Center*. May.

potential to damage residential structures made of non-engineered timber.[92] The greatest levels of vibration are anticipated to occur during the site preparation phase, during which a large bulldozer and a loaded truck are expected to be used. All other phases are expected to result in lower vibration levels.

The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project site boundary (assuming the construction equipment would be used at or near the project site boundary) because vibration impacts normally occur within the buildings. Table 3.13.F shows the PPV and VdB values at a distance of 25 feet from the construction vibration source. As shown in Table 3.13.F, bulldozers and loaded trucks would generate a ground-borne vibration level of 87 VdB and 86 VdB, respectively, when measured at a distance of 25 feet,

Table 3.13.F: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/Lv at 25 feet	
	PPV (in/sec)	Lv (VdB)[1]
Pile Driver (Impact), Typical	0.644	104
Pile Driver (Sonic), Typical	0.170	93
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large Bulldozer	**0.089**	**87**
Caisson Drilling	0.089	87
Loaded Trucks	**0.076**	**86**
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
Note: Equipment shown in **bold** is expected to be used on site. Pile drivers and vibratory rollers are not expected to be used.
[1] RMS VdB is 1 µin/sec.
µin/sec = microinches per second
FTA = Federal Transit Administration
in/sec = inches per second
Lv = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity decibels

based on the FTA *Transit Noise and Vibration Impact Assessment Manual*.[93] Pile drivers and vibratory rollers are not expected to be used during construction of this project.

92 Federal Transit Administration (FTA). September 2018. *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No. 0123. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed January 16, 2020).

93 Federal Transit Administration (FTA). September 2018. *Transit Noise and Vibration Impact Assessment Manual*. FTA Report No. 0123. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed January 16, 2020).

The formula for vibration transmission is provided below. Table 3.13.G provides a summary of off-site construction vibration levels.

$$L_vdB\ (D) = L_vdB\ (25\ feet) - 30\ Log\ (D/25)$$

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$$

Table 3.13.G: Potential Construction Vibration Damage Impacts at Nearest Receptor

Receptor (Location)	Reference Vibration Level (PPV) at 25 ft[1]	Distance (ft)[2]	Vibration Level (PPV)
Residence (West)	0.089	30	0.068
Industrial (Southeast)		340	0.002
Residence (Southwest)		390	0.001
Industrial (Northeast)		360	0.002

Source: Compiled by LSA (2023).
[1] The reference vibration level is associated with a large bulldozer, which is expected to be representative of the heavy equipment used during construction.
[2] The reference distance is associated with the peak condition, identified by the distance from the perimeter of construction activities to surrounding structures.
ft = foot/feet
PPV = peak particle velocity

As discussed above, the FTA guidelines indicate that for a non-engineered timber and masonry building, the construction vibration damage criterion is 0.2 PPV in/sec.

Based on the information provided in Table 3.13.G, vibration levels are expected to approach 0.068 PPV in/sec at the nearest surrounding structures and would be below the 0.2 PPV in/sec damage threshold. Other building structures surrounding the project site are farther away and would experience further reduced vibration. Therefore, the impact would be considered **less than significant**. No mitigation measures are required.

Short-Term Construction Related Vehicular and Long-Term Operational Vibration. The proposed uses on the project site are generally limited to building mechanical equipment and vehicle circulations and would be limited to the immediate vicinity of the project site. In addition, vibration levels generated from project-related traffic on the adjacent roadways (Placentia Avenue, Harvill Avenue, and Water Street) are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Therefore, no vibration generated from project-related traffic on the adjacent roadways would occur, and no vibration reduction measures are required. Vibration generated from project-related traffic on the adjacent roadways would be **less than significant**. No mitigation is required.

c. 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 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?

Less Than Significant Impact. The closest airport use to the project site is the March Air Reserve Base/Inland Port Airport (MARB/IPA), which is located approximately 2.8 miles north of the project site. According to the MARB/IPA Land Use Compatibility Plan,[94] the project site is located within the boundaries of Compatibility Zone C2 (Flight Corridor Zone). Single-event noise levels in this area can be intrusive. However, at present, nearly all of the flight training activity takes place during daylight hours on weekdays, thus reducing the significance of the noise impact on sensitive land uses. Project land use compatibility, including noise considerations, are discussed in Section 3.11(b) Land Use and Planning. Furthermore, the Perris Valley Airport and Hemet-Ryan Airport are located approximately 3.6 miles south and 14 miles southeast of the project site, respectively. Based on Map PV-3 and Map HR-3 of the Riverside County Airport Land Use Compatibility Plan[95] and Hemet-Ryan Airport Land Use Compatibility Plan,[96] the project site is located beyond the 55 dBA CNEL impact zone from both airports. Therefore, the project would not expose people residing or working in the project area to excessive noise levels, and impacts would be **less than significant**. No mitigation measures are required.

94 March Air Reserve Base/Inland Port Airport (MARB/IPA). 2014. *Airport Land Use Compatibility Plan*. November 13.

95 County of Riverside. 2010. *Riverside County Airport Land Use Compatibility Plan*. July.

96 County of Riverside. 2017. *Hemet-Ryan Airport Land Use Compatibility Plan*. February 9.

4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☐	☒

4.14.1 Impact Analysis

a. 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)?

Less Than Significant Impact. The proposed project includes the construction and operation of a Wellness Village consisting of five public health buildings, one future administrative building, surface parking, landscaping, and walkways set in a campus setting. The proposed project includes some short-term residential uses for patients for stays ranging from less than 24 hours for outpatient services to up to 415 days for those unable to live by themselves but do not require 24-hour nursing care. Although temporary residential uses are proposed, temporary residents would likely come from within Riverside County rather than inducing new population growth from outside the county as the campus is intended to provide behavioral health services to Riverside County residents. Nevertheless, the project site does not currently contain any residential uses. As such, implementation of the proposed project could potentially result in a small, localized increase in the project area's population.

The proposed project would induce minor population growth in the project vicinity by adding approximately 605 employees and 538 temporary residents (those who would remain at the project site for longer than 30 days). The addition of 1,143 people at the project site represents less than 0.1 percent[97] of Riverside County's 2022 population of 2,473,902.[98] As previously discussed, given that the project is intended to provide behavioral health services to Riverside County residents, it can be reasonably assumed that a large portion, if not all, of the campus's 605 employees and 538 temporary residents would be comprised of individuals who already live in the county, and that a population increase of less than 0.1 percent represents a conservative scenario. Moreover, local zoning would ensure that the intensity of growth in the area would occur as planned.

[97] 1,143 / 2,473,902 = 0.000462

[98] United States Census Bureau. n.d. QuickFacts, Riverside County, California. Website: https://www.census.gov/quickfacts/fact/dashboard/riversidecountycalifornia/PST045223 (accessed May 8, 2023).

During project operation, it is anticipated the project would be staffed by 605 employees. According to the Mead Valley Area Plan, the plan area consists of approximately 29,683 employment opportunities.[99,100] As such, implementation of the proposed project would result in an approximately 2 percent increase in employment opportunities in the plan area. However, the statistical calculation for employment in the plan area contained in the Mead Valley Area Plan is based on the midpoint for the theoretical range of buildout projects based on the General Plan land use designation and zoning district. Because a portion of the proposed project's expected increase in employees at the project site has been included in the statistical calculation for employment for the plan area contained in the Mead Valley Area Plan, the increase in employment opportunities of approximately 2 percent represents a conservative, worst-case scenario. Moreover, this employment increase is minimal relative to the plan area's overall employment estimates.

The project site is located within an urbanized area of Riverside County and is surrounded by improved streets and existing utility infrastructure. Although the proposed project would include infrastructure improvements (e.g., connections to off-site utility infrastructure and the extension of utility services throughout the project site), the proposed project does not propose to expand surrounding utility infrastructure in the project vicinity, nor does the proposed project include roadway expansions or improvements that would indirectly induce unplanned population growth. As such, the proposed project would not result in substantial unplanned population growth, nor would the proposed project indirectly induce population growth through utility or circulation improvements. Therefore, potential impacts related to inducement of unplanned population growth, either directly or indirectly, would be **less than significant**. No mitigation would be required.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed project includes the construction and operation of a Wellness Village consisting of five public health buildings, one future administration building, surface parking, short-term residential uses for patients, landscaping, and walkways set in a campus setting. No housing is currently present on the project site; therefore, there are no people living on the project site that would be displaced with development of the proposed project. Therefore, there would **no impacts** related to the displacement of substantial numbers of people or housing units, and no mitigation is required.

99 County of Riverside. 2021c. *County of Riverside General Plan, Mead Valley Area Plan, Table 2: Statistical Summary of Mead Valley Area Plan*. September 28. Website: https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-GPA-2022-Compiled-MVAP-4-2022-rev.pdf (accessed December 2023).

100 Statistical calculations for population were based on the midpoint for the theoretical range of buildout projections. Refer to Appendix E-1 of the General Plan for assumptions and methodology used.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

4.15.1 Impact Analysis

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered 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:

i. Fire protection?

Less Than Significant Impact. Fire protection services in the Mead Valley Plan Area are provided by the RCFD in cooperation with CAL FIRE. The RCFD operates 101 fire stations[101] and provides fire and emergency services to residents of unincorporated areas of Riverside County as well as 20 partner cities.[102] The RCFD is divided into 15 Battalions, including Perris Battalion 1, which would serve the project site. Perris Battalion 1 consists of 8 fire stations, including Fire Station Nos. 1, 3, 4, 8, 9, 59, 90, and 101. In 2021, Perris Battalion 1 responded to 14,591 calls, including 10,635 medical calls, 23 hazmat calls, 1,394 traffic collisions, 109 vehicle fires, 175 wildland fires, 89 residential structure fires, 205 standby calls, 22 rescue calls, 333 public assist calls, 989 false alarm calls, and 617 other calls.[103]

The nearest fire station to the project site is Fire Station No. 59, Mead Valley, within Perris Battalion 1, which is located at 21510 Pinewood Street, approximately 2.3 mile northwest of the project site. The most recent data provided by RCFD indicates that in 2021, Fire Station No. 59

[101] Riverside County Fire Department. *Fire Stations.* Website: https://www.rvcfire.org/resources/fire-stations. (Accessed August 2, 2023).
[102] Riverside County Fire Department. *Riverside County Fire Department Service Area.* Website: https://www.rvcfire.org/about-us/service-area. (Accessed August 2, 2023).
[103] Riverside County Fire Department. 2021. *2021 Annual Report, Perris Battalion 1*.

responded to 2,878 calls including 2,173 medical calls, 3 hazmat calls, 249 traffic collisions, 22 vehicle fires, 26 wildland fires, 16 residential structure fires, 48 standby calls, 3 rescue calls, 71 public assist calls, 167 false alarm calls, and 101 other calls.[104] The RCFD has adopted National Fire Protection Association (NFPA) Standard 1710 as a guideline for response times, which calls for an engine company response within 4 minutes of travel time to fire incidents and Emergency Medical Services (EMS) calls and a full-fire-alarm group within 8 minutes of travel time for a minimum of 90 percent of annual incidents.[105] Average travel time between the project site and the nearest fire station to the project site, Fire Station No. 59, is approximately 9 minutes. Through compliance with California Vehicle Code 21806(A)(1), which requires all vehicles to yield to emergency vehicles, travel time between Fire Station No. 59 and the project site is expected to be meet the NFPA Standard 1710 guideline for response time.

The project would include entry and exit points for emergency access from six driveways, including one from Placentia Avenue, two from Harvill Avenue, and two from Water Street. Fire department access locations and design would be in accordance with the California Fire Code, Riverside County Ordinance 787 (which requires an automatic residential fire sprinkler system) and Riverside County Fire Department Standards to ensure, among other requirements, proper roadway turning radii and fire lane widths. Additionally, the proposed project's site plan includes provisions for emergency vehicle access, which also would be reviewed for adequacy by the RCFD. In addition, EMWD indicated there is sufficient flow in the 24-inch-diameter water line located in Harvill Avenue. As such, no additional physical improvements are anticipated to be necessary for fire flow purposes. Furthermore, design and construction of the project would be in accordance with the current CBC, which includes design features such as ignition-resistant materials and the incorporation of fire sprinklers that would minimize any risk of exposure of persons or property to fire.

The proposed project would develop a Wellness Village on the project site that would consist of five public health buildings, surface parking, short-term residential uses, associated landscaping, and site circulation improvements. The project site is located within an urbanized area of Riverside County that is already served by the RCFD. As discussed in Section 4.14, Population and Housing, implementation of the proposed project is anticipated to result in an incremental increase of 1,143 persons on the project site, including 605 employees and 538 temporary residents of the facility (longer than 30 days). The addition of 1,143 people at the project site represents less than 0.1 percent[106] of the County's 2022 population of 2,473,902,[107] which is already served by the RCFD. In addition to the increase in the population at the project site, operation of the campus would result in staff and visitors traveling to and from the project site, which could incrementally increase in calls for fire protection services. In addition, the proposed project would develop the site with a behavioral health campus that would be staffed with doctors, nurses, and other health care professionals who could further reduce the need for paramedic-related calls.

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104 Riverside County Fire Department. 2021. *2021 Annual Report, Perris Battalion 1*.

105 County of Riverside. 2002. *General Plan Environmental Impact Report, Volume I, SCH# 2002051143, Public Services.* August 8.

106 1,143 / 2,473,902 = 0.000462

107 United States Census Bureau. n.d. *QuickFacts, Riverside County, California.* Website: https://www.census.gov/quickfacts/riversidecountycalifornia (accessed May 8, 2023).

The Riverside County standard for the establishment of a new fire station is the development of 2,000 dwelling units or 3.5 million square feet of commercial or industrial uses.[108] Because the proposed project would develop the project site with a total of 450,361 square feet of building space and 436 beds, implementation of the proposed project itself would not require the construction of a new first station. However, as indicated in the County's General Plan Environmental Impact Report (EIR), build out of the County's General Plan would require approximately 379 new fire stations to accommodate projected growth in Riverside County. The RCFD's ability to support the needs of future growth is dependent upon its ability to secure sites for, construct, and equip new fire stations in a timely manner. In order to achieve fire protection for all the residents of Riverside County, the General Plan includes policies (e.g., the enforcement of fire standards during the review of building plans and building inspections) that are intended to address the effects of fire hazards on future residents and habitable structures. These policies reduce the effects of fire hazards by both reducing the fire threat and by maintaining adequate fire protection plans. With implementation of the General Plan policies and County requirements, the General Plan EIR determined that potential impacts related to the effects of future development on fire protection services would be reduced to a less than significant level. Because the proposed project is an employee-intensive use that is allowed within the Business Park (BP) General Plan designation for the site, and the proposed project's uses are anticipated and considered within the General Plan, the development of the project site was included in the General Plan's evaluation of fire protection facilities with buildout of the General Plan. Therefore, the proposed project's minimal increase in demand for fire protection services would be covered under the County's future plans for construction of additional fire stations and facilities.

The proposed project would not impair emergency response vehicles or increase response times and would not substantially increase calls for service to the project site. As such, construction and operation of the proposed project would not trigger the need for new or altered fire facilities, the construction of which could cause significant environmental impacts. In addition, based on the project site's distance from the nearest fire station, the RCFD is anticipated be able to maintain appropriate response times and current levels of service to the project site following project implementation. The proposed project would be required to comply with all applicable Fire Code requirements, and the proposed project's site plan would require approval by the RCFD prior to project implementation. Therefore, potential impacts related to fire protection services would be **less than significant**, and no mitigation is required.

ii. Police protection?

Less Than Significant Impact. The Riverside County Sheriff's Department provides law enforcement and crime prevention services to the unincorporated areas of Riverside County and contract cities, including the project site. The Riverside County Sheriff's Department is the second largest sheriff's office in California and operates 10 Sheriff's Stations spread across the region, which serve approximately 1,400,000 residents of the county's population of 2,473,902.[109] The Riverside County

[108] County of Riverside. 2002. *General Plan Environmental Impact Report, Volume I, SCH# 2002051143, Public Services*. August 8.

[109] Riverside County Sheriff's Department. n.d. 911 Dispatch Communications. Website: https://www.riversidesheriff.org/772/911-Dispatch-Communications (accessed August 2, 2023).

Sheriff's Department has three communication centers, including Central Dispatch, which is located in Riverside.[110] The nearest sheriff's station is the Perris Sheriff's Station, which is located at 137 North Perris Boulevard, approximately 3 miles southeast of the project site. This station also provides police protection services to Perris and various unincorporated Riverside County communities, including Mead Valley.[111] The Sheriff's Department has established a service ratio of 1.5 officers per 1,000 Riverside County residents.[112] With 2,147 full-time sworn officers,[113] the Sheriff's Department has a current officer-to-resident ratio of 1.53.[114]

Construction of the proposed project would temporarily increase the population at the project site during the construction period, which could result in a slight increase in calls for police protection services. However, this increase in the on-site population would be temporary (approximately 1 year), and construction-related impacts on police protection services would cease once construction was completed. As such, any temporary increase in calls for police protection services would not result in permanent impacts on services post-construction.

The proposed project would develop a Wellness Village on the project site that would consist of five public health buildings, surface parking, short-term residential uses, associated landscaping, and site circulation improvements. The project site is located within an unincorporated area of Riverside County that is already served by the Riverside County Sheriff's Department. As discussed above, operation of the proposed project is anticipated to result in an incremental increase of 1,143 persons on the project site and represents less than 0.1 percent of the 1,400,000 residents already served by the RCFD[115], and would not change the current officer-to-resident ratio of 1.53.[116]

In addition to the increase in the population at the project site, operation of the project would result in staff and visitors traveling to and from the project site, which could also contribute to an increase in calls for sheriff protection services. However, under existing conditions, the project site is currently undeveloped and does not preclude or discourage unlawful activity, including trespassing and illegal trash disposal. Development of the site with a Wellness Village that would include Crime Prevention Through Environmental Design features, such as well-lit and well-maintained walkable spaces with good visibility, would not only deter trespassing through the presence of staff and the public, but would also help keep police service demand increases to a minimum. In addition, the proposed project would include state-of-the-art security measures, including private security and law enforcement partnerships with the Riverside County Sheriff's Department to provide a safe and

110 Riverside County Sheriff's Department. n.d. 911 Dispatch Communications. Website: https://www.riversidesheriff.org/772/911-Dispatch-Communications (accessed August 2, 2023).

111 Riverside County Sheriff's Department. n.d. Perris Station. Website: https://www.riversidesheriff.org/746/Perris-Station (accessed August 2, 2023).

112 County of Riverside. 2002. *General Plan Environmental Impact Report, Volume I, SCH# 2002051143, Public Services*. August 8.

113 County Office.org. n.d. Riverside County Sheriff in Riverside, California. Website: https://www.countyoffice.org/riverside-county-sheriff-riverside-ca-d5f/#:~:text=Riverside%20County%20Sheriff%20Details%20Precincts,17%20Full%20Time%20Sworn%20Officers%202%2C147 (accessed November 9, 2023).

114 (2,147 officers / 1,400,000 residents)* 1,000 = 1.53

115 1,143 / 1,400,000 – 0.000816

116 (2,147 officers / 1,401,143 residents)* 1,000 = 1.53

secure environment for employees, visitors, and patients. The proposed project would also include advanced security technology with surveillance cameras throughout the campus to monitor all activities. The implementation of these security measures at similar healthcare campuses within the Riverside University Health System (RUHS) has been well-received by clients, staff, and the community.

In addition, the proposed project would provide critical behavioral health services to individuals who may have severe emotional disorders or substance abuse issues. Law enforcement officers are often the first and only responders to calls regarding mental health or substance abuse when individuals or their caretakers have nowhere else to go for help or support. These calls can be among the most complex and time-consuming for law enforcement officers to resolve, redirecting them from addressing other public safety concerns and violent crime.[117] It is estimated that at least 20 percent of police calls for service involve a mental health or substance use crisis.[118] With access to services such as mental health urgent care and a sobering center (which would be provided by the proposed project), it is likely that service calls to Riverside County Sheriff's Department relating to mental health and substance abuse could decrease, thereby reducing police service demand in the community, offsetting any increase in calls for police protection services to the site that would occur from implementation of the project.

Therefore, the project would not impair police response times or increase response times and would not substantially increase calls for service. As such, construction and operation of the proposed project would not trigger the need for new or altered police facilities, the construction of which could cause significant environmental impacts. Consequently, the Riverside County Sheriff's Department would be able to maintain the current levels of service provided to the project site following project implementation. Therefore, potential impacts related to police protection services would be **less than significant**, and no mitigation is required.

iii. Schools?

Less Than Significant Impact. The project site is served by the Val Verde Unified School District (VVUSD), which consists of 13 elementary schools, 4 middle schools, 4 high schools, 2 adult schools, and the Val Verde Academy.[119] The project site would be served by Columbia Elementary School (located at 21350 Rider Street, approximately 2.4 miles northwest of the project site), Thomas Rivera Middle School (located at 21675 Martin Street, approximately 2.5 miles northwest of the project site), and Citrus Hill High School (located at 18150 Wood Road, approximately 5 miles northwest of the project site). Any students generated by the project would reside within the attendance boundaries of these three schools.

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117 Council of State Governments, Justice Center. 2019. *Police-Mental Health Collaborations: A Framework for Implementing Effective Law Enforcement Responses for People Who Have Mental Health Needs*. April.

118 American Psychological Association. n.d. Building Mental Health into Emergency Responses. Website: https://www.apa.org/monitor/2021/07/emergency-responses (accessed May 11, 2023).

119 Val Verde Unified School District. n.d. *Schools.* Website: https://www.valverde.edu/en-US/schools (accessed January 2024).

The proposed project would develop a Wellness Village, which can also be described as a behavioral health campus, on the project site that would consist of five public health buildings, surface parking, short-term residential uses, associated landscaping, and site circulation improvements. The Wellness Village would include services and programs for school-aged children, including Supportive Housing for children and their families with severe emotional disorders, a Children's Crisis Residential Program, and a Children's Intensive Mental Health Treatment Program, which could increase the population of school-aged children at the project site. School-aged children participating in the Children's Crisis Residential Program and Children's Intensive Mental Health Treatment Program would not leave the facility to attend school while residing on campus.[120] As such, children enrolled in these programs will not increase the demand on schools in the vicinity of the Wellness Village. Once they leave the facility, these students would attend schools in the school district that serves their permanent residence.

Ten of the supportive residential units would be designed to accommodate families. Given the small amount of family housing included in the proposed project, the project is expected to generate a minimal number of new school-aged children that would attend schools in the VVUSD. In addition, because the proposed project is anticipated to serve residents from the surrounding area, the minimal number of new school-aged children are expected to already be served by school districts within Riverside County.

A School Facilities Needs Analysis was prepared for the VVUSD in January 2018 [121] to provide the factual basis for the VVUSD to adopt alternative school facility fees that may be collected from residential development. This analysis was partially based on the VVUSD's enrollment capacity and student enrollment data. In the 2017/2018 school year, the VVUSD had a capacity of 22,016 seats, including 11,482 seats at the elementary school level, 3,094 seats at the middle school level, and 7,440 seats at the high school level. Student enrollment data for the same school year was 20,304 students, including 10,565 students at the elementary school level, 3,181 students at the middle school level, and 6,558 students at the high school level. As such, the VVUSD's enrollment capacity exceeded the student enrollment for elementary and middle/high school levels in the 2017/2018 school year. The analysis determined that the VVUSD would have the capacity to accommodate additional students from future residential developments; however, VVUSD would not have the capacity or funds to accommodate all of anticipated additional students. The number of anticipated additional students was determined by using historical student generation rates and information obtained from the planning departments of the cities of Moreno Valley, Perris, and Riverside regarding the number of anticipated future residential units. Because of the inadequate capacity, the analysis found the VVUSD eligible to use Alternative Fees to fund new school sites and receive new construction funding for school facilities under the School Facilities Program (SFP) established by Section 17070.10 of the Education Code in order to expand and improve school facilities to accommodate additional students.

120 Personal communication with Mila Volkova, Senior Associate at Boulder Associates on May 16, 2023.

121 Cooperative Strategies. 2018. *Val Verde Unified School District School Facilities Needs Analysis*. January 31.

Between the 2017/2018 and 2021/2022 school years, enrollment in VVUSD decreased from 20,304 students to 19,216 students.[122] Enrollment sightly increased to 19,379 students during the 2022/2023 school year;[123] however, the 2022/2023 enrollment is still 925 students less than the 2017/2018 school year enrollment. Overall, the 2018 School Facilities Needs Analysis determined that VVUSD's enrollment capacity is exceeding its current enrollment, and the district's enrollment has decreased since 2018. In addition, funding is available for the VVUSD to expand and improve school facilities. As such, the minimal increase in school-aged children at the project site with development of the proposed project is not expected to substantially affect the VVUSD's ability to serve its existing student population.

Given the small amount of school-aged children that would be generated from the 10 supportive residential units, the proposed project would not have a significant impact on schools related to the provision of new or physically altered governmental facilities, or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. Therefore, potential impacts related to schools would be **less than significant**, and no mitigation is required.

iv. Parks?

Less Than Significant Impact. Refer to responses to Checklist Questions 3.16(a) and 3.16(b) in Section 4.16, Recreation. Impacts would be less than significant, and mitigation is not required.

v. Other public facilities?

Less Than Significant Impact. The Riverside County Library System (RCLS) is a public library system with 35 locations, two Mobile Resource Vans, two museums, and a Creation Station in Riverside County. The RCLS serves a population of approximately 1,400,000 residents over approximately 7,303 square miles. The RCLS includes a collection of over 1,300,000 books, materials, and electronic resources, as well as programs relating to education, literacy, jobs and career development, and life enrichment.[124] The nearest RCLS facility is the Perris Library, which is located at 163 East San Jacinto, approximately 2.6 miles southeast of the project site.

Although the proposed project would increase the population at the project site by 1,143 persons, the Wellness Village is anticipated to serve existing Riverside County residents and, as such, the increase in population at the project site would not generate new patrons to be served by the Perris Library. In addition, the Outpatient Urgent Care Programs building within the proposed project would include a library and resource center, which would further reduce the impact on the surrounding libraries because residents of the proposed project would likely utilize on-site library resources. Therefore, the proposed project would not increase demand for library facilities in the

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122 California Department of Education. n.d. DataQuest, Enrollment Multi-Year Summary by Grade, Val Verde Unified Report (33-75241). Website: https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdYears.aspx?cds=3375242&agglevel=district&year=2022-23 (accessed August 2, 2023).

123 Ibid.

124 Riverside County Library System. n.d. About Us. Website: https://www.rivlib.net/about/about-us (accessed August 2, 2023).

project vicinity, and impacts to library facilities would be **less than significant**. No mitigation would be required.

4.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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?	☐	☐	☒	☐
b. 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?	☐	☐	☒	☐

4.16.1 Impact Analysis

a. 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?

Less Than Significant Impact. The Riverside County Regional Park and Open-Space District manages 7 regional parks, 7 regional open space areas, 10 wildlife areas or reserves, and several trail systems, including the multi-county Santa Ana River Trail. Regional parks in Riverside County include Lake Cahuilla Veterans Regional Park, Ranch Jurupa Regional Park, Lake Skinner Recreation Area, Hurkey Creek Park, Mayflower Regional Park, Idyllwild Regional Park, and McCall Equestrian Compound.[125] Riverside County also includes recreational open-space areas, including the Santa Rosa Plateau Ecological Reserve, Box Springs Mountain Reserve, Hidden Valley Wildlife Area, Sylvan Meadows Multi-Use Area, Harford Springs Reserve, Southwestern Riverside County Multi-Specific Reserve, and Kabian Park.[126]

The nearest County park to the project site is Harford Springs Reserve, which is located south of Riverside, near Lake Matthews, approximately 6.4 miles west of the project site. Harford Springs Reserve is approximately 325 acres, 2,000 feet above sea level, and supports a diverse habitat including oaks, eucalyptus trees, and ample amounts of wildlife. The reserve contains a unique trail system for all levels of hikers and equestrian trails.[127]

Although the project site is located within an unincorporated area of Riverside County, it is located approximately 0.3 mile west of Perris. As such, temporary residents and visitors could use parks under the jurisdiction of the City of Perris. The City of Perris Parks Department operates 25 parks. The nearest City park is Paragon Park, located at 264 Spectacular Bid Street approximately 1.4 miles

[125] Riverside County Regional Park and Open Space District. n.d. About Us. Website: https://www.rivcoparks.org/ (accessed August 2, 2023).
[126] Ibid.
[127] Riverside County Regional Park and Open Space District. n.d. *Harford Springs Reserve*. Website: https://rivcoparks.org/open-space-areas-and-reserves/harford-springs-reserve (accessed October 25, 2023).

east of the project site. The approximately 14.1-acre park contains basketball courts, fitness equipment, picnic tables, playground equipment, public restrooms, and a skate park.[128]

As discussed in Section 4.14, Population and Housing, implementation of the project is estimated to result in a population increase of approximately 1,143 people at the project site. However, the behavioral health campus is anticipated to predominantly serve existing Riverside County residents and as such, the increase in population at the project site would likely come from surrounding county residents (Mead Valley, Perris, Menifee area) who may already utilize City of Perris and Riverside County parks and recreational facilities. The proposed project may treat individuals outside of the Riverside County, such as youth of homeless veterans; however, this would be a rare occurrence and would not result in substantial deterioration of County recreational facilities.

In addition, the proposed project would include 140,620 square feet of various private indoor and outdoor recreational spaces to be used by patients and visitors. These recreational spaces would not be open to the public. The proposed Supportive Housing apartments, Recovery Residence, Residential Substance Use Treatment, and Outpatient Urgent Care Programs would each include an outdoor recreation space that offers playgrounds and outdoor seating. The Mental Health Rehabilitation Center, Crisis Recovery Treatment, Children's Mental Health Urgent Care, and Outpatient Urgent Care Programs would also each include indoor recreational areas and common spaces. Additionally, the proposed project includes a landscaped walking path in the interior of the site. Temporary residents of the Wellness Village are not anticipated to use off-site parkland and recreational facilities because the campus is intended to contain all-inclusive on-site services and amenities for the daily needs of the proposed project's temporary residents. Nevertheless, some project employees, residents, or their visitors may use other public recreational facilities. As a result, the proposed project would create an incremental increase in the use of area parks. However, this increase would be negligible given on-site recreational amenities and would not result in the substantial deterioration of recreational facilities. In addition, it is unlikely that construction workers would use surrounding recreational facilities during construction of the proposed project. Therefore, potential impacts related to parks and recreational facilities would be **less than significant**, and no mitigation is required.

b. 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?

Less Than Significant Impact. As previously stated above, the proposed project would include 140,620 square feet of shared indoor and outdoor recreational spaces. On-site recreational amenities are anticipated to include outdoor recreation areas (including playgrounds, outdoor seating, and sports courts), indoor recreation areas, common spaces, and a walking path. These amenities would be used by patients and visitors and would not be open to the public. Residents of the Wellness Village are not anticipated to use off-site parkland and recreational facilities because the campus is intended to contain on-site services and amenities for the daily needs of the proposed project's residents. Nevertheless, some project employees, residents, or their visitors may use other public recreational facilities. As a result, the proposed project would create an incremental increase

[128] City of Perris. n.d. *Paragon Park.* Website: https://www.cityofperris.org/Home/Components/FacilityDirectory/FacilityDirectory/28/88 (accessed August 2, 2023).

in the use of area parks. However, this increase would be negligible given the access to on-site recreational amenities and would not result in the substantial deterioration of recreational facilities.

The construction of shared recreational areas is part of the proposed project, and the potential adverse effects associated with implementation of the proposed project on aesthetics, air quality, agricultural and forestry resources, biological resources, GHG emissions, hazards and hazardous materials, hydrology and water quality, mineral resources, noise, population and housing, public services, transportation, and wildfire have been considered through the analysis in this IS/MND.

The proposed project is inherently designed to provide services to the public in a supportive environment with appropriate recreational amenities. Therefore, the construction of the proposed project would be in accordance with applicable County policies and would not require new or physically altered park and recreation facilities, the construction of which could cause significant environmental impacts. Therefore, potential impacts related to parks and recreation would be **less than significant**, and no mitigation is required.

4.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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 §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. Result in inadequate emergency access?	☐	☐	☒	☐

The information and analysis in this section is based on the Transportation Analysis[129] prepared by LSA in January 2024 and provided in **Appendix H.** The Transportation Analysis includes a VMT analysis, project trip generation, trip distribution, study area, and analysis methodologies, and has been approved by County staff via the Scoping Agreement process.

4.17.1 Impact Analysis

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

Less Than Significant Impact. The proposed project would develop the project site with the Wellness Village, which consists of five public health buildings, 633 surface parking spaces, landscaping, and walkways set in a campus setting. In addition to the Wellness Village, the proposed project includes potential buildout of a conceptual future building that would include up to 20,000 square feet of administrative/office uses on the project site independent from the Wellness Village. The five public health buildings would range in size from one to four stories and would include: (1) a 99,250-square-foot Community Wellness and Education Center building, (2) a 40,854-square-foot Children and Youth Services building, (3) a 50,989-square-foot Urgent Care Services building, (4) a 192,495-square-foot Supportive Transitional Housing building for those receiving treatment, and (5) a 66,773-square-foot Extended Residential Care building for those receiving treatment. A 2,793-square-foot market is proposed as part of the project in the Community Wellness and Education Center building. The market would likely sell produce, grab-and-go meals, and other food and drink items. The market would be operated by a third party and is intended to primarily serve the occupants and visitors of the site, not the general public. However, a small percentage of customers could be members of the general public. Given the scope of this use, the market is assumed as an amenity to the Community Wellness and Education Center building instead of as a separate, stand-alone use.

[129] LSA Associates, Inc. 2024. *Transportation Analysis, Mead Valley Wellness Village Project*. January.

The five public health buildings would total approximately 450,361 square feet. In addition, the project includes consideration of a future 20,000-square-foot administrative building. Among these buildings, the Children and Youth Services building would include approximately 24 beds associated with the children and youth services crisis residential component and approximately 6 beds associated with the short-term residential therapeutic program, for a total of approximately 30 beds. The Urgent Care Services building would include approximately 16 beds associated with the crisis residential component and approximately 40 beds associated with the substance use disorder residential component, for a total of approximately 56 beds. This building would also include approximately 12 "non-bed" spots associated with adult mental health urgent care services, approximately 12 spots associated with the children's mental health urgent care services, and approximately 15 spots associated with the sobering center. The Supportive Transitional Housing building would provide approximately 296 beds (76 beds for the recovery residence and 220 beds for supportive housing). The Extended Residential Care building would provide approximately 140 beds (50 beds for mental health rehabilitation and 90 beds for adult residences). The proposed project would develop approximately 522 total beds. Overall, the proposed project would develop the project site with approximately 522 beds. Of the 522 beds, approximately 442 are expected to be used by those patients staying and receiving treatment for more than 30 days. The Wellness Village would provide an entire continuum of behavioral health and wellness care ranging from urgent treatment to supportive housing, including outpatient care, education, and social services.

It should be noted that as part of the approved Scoping Agreement for the Transportation Analysis, the trip generation was estimated by considering a 97,781-square-foot Community Wellness and Education Center building and a 30,000-square-foot future administrative/office building. As stated above, the scope of the project has been slightly modified. The Community Wellness and Education Center building has been increased to 99,250 square feet, and the administrative building has decreased to 20,000 square feet. The overall square footage of the project has decreased by 8,531 square feet from the project contemplated in the approved scoping agreement. As such, the trip generation of the approved Scoping Letter provides a more conservative estimate than the modified project, and the Transportation Analysis utilizes the trip generation from the approved scoping letter throughout.

The Transportation Analysis examined the traffic operations in the vicinity of the project site under the existing (2023) conditions, project completion (2027) plus project conditions, and cumulative (2027) plus project conditions. The future administrative building would be constructed adjacent to Placentia Avenue as part of the future development of the proposed project. However, full buildout of the proposed project, including the future administrative building, was considered in a single phase for the Transportation Analysis. The Transportation Analysis was prepared to satisfy the requirements established in the *Riverside County Transportation Analysis Guidelines for Levels of Service and Vehicle Miles Traveled* (Riverside TA Guidelines), dated December 2020. The Transportation Analysis includes a VMT analysis per CEQA requirements and a level of service (LOS) analysis for General Plan consistency purposes only, as recommended in the Riverside Transportation Analysis Guidelines.

The proposed project is anticipated to generate 2,862 daily vehicle trips to and from the project site, including 281 trips during the a.m. peak hour and 252 trips during the p.m. peak hour. Because the

proposed project would generate more than 100 peak-hour trips and would add more than 50 peak-hour trips, the Transportation Analysis analyzed the proposed project's impact on Riverside County and California Department of Transportation (Caltrans) intersections in the surrounding area under the existing (2023) conditions, project completion (2027) plus project conditions, and cumulative (2027) plus project conditions scenarios. Per the County's General Plan, LOS D shall apply to all development proposals located within any of the following Area Plans: Eastvale, Jurupa, Highgrove, Reche Canyon/Badlands, Lakeview/Nuevo, Sun City/Menifee Valley, Harvest Valley/Winchester, Southwest Area, The Pass, San Jacinto Valley, Western Coachella Valley, and those Community Development Areas of the Elsinore, Lake Mathews/Woodcrest, Mead Valley, and Temescal Canyon Area Plans. Because the project site is located within the Mead Valley area of Riverside County, LOS D has been considered as the LOS target standard for study intersections under the County's jurisdiction. Per the Caltrans District 8 Office of Intergovernmental Review, Community and Regional Planning, LOS D is considered the LOS standard for State highways and freeway ramps within the District's jurisdiction.

Under existing conditions, all study intersections operate at an overall satisfactory LOS except for the I-215 Northbound Ramps/Placentia Avenue intersection, which operates at LOS F in the a.m. peak hour. Under project completion (2027) plus project conditions and cumulative (2027) plus project conditions scenarios, the LOS of this intersection is forecasted to deteriorate further. As such, the proposed project would add to the existing deficiency at this location. As provided in the Transportation Analysis, restriping the northbound through left to northbound left through right, along with optimizing the signal timing, would eliminate the forecasted operational deficiency. With implementation of these improvements, the resulting LOS at I-215 Northbound Ramps/Placentia Avenue intersection would be LOS D or better, consistent with the County's LOS target standard for study intersections under the County's jurisdiction and the Caltrans LOS standard for State highways and freeway ramps.

Pursuant to PRC Section 21099(b)(2), "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestions shall not be considered a significant impact on the environment." Accordingly, the proposed project's contribution towards delays at the I-215 Northbound Ramps/Placentia Avenue intersection do not result in a significant environmental impact. Moreover, the proposed project does not conflict with any General Plan policy concerning LOS because the intersection is projected to operate at a LOS F with or without the project. Further, because the proposed project is being funded with grants under the State's Behavioral Health Continuum Infrastructure Program, "it is deemed consistent and in conformity with any applicable local plan, standard, or requirement" pursuant to Cal. Wel. & Inst. Code, §5960.3. Accordingly, the proposed project's contribution towards the deterioration of LOS at the subject intersection would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

The proposed project would include the construction of a regional bicycle/pedestrian trail along the northern and eastern edges of the project site that would assist with the implementation of the planned trails in the vicinity of the project site. The County's General Plan designates Placentia Avenue, which bounds the project site to the north, as a planned urban/suburban regional trail. As such, implementation of the proposed project would develop a regional trail consistent with the

County's planned trail network and would enhance the non-motorized transportation network in Riverside County. In addition, the proposed project would construct a bus stop on Harvill Avenue, expanding the County's public transit network into a previously underserved area of Riverside County. As such, the proposed project would further the transit goals of the County's General Plan and would not conflict with any program, plan, ordinance, or policy addressing the non-motorized transportation of public transit network in Riverside County.

In addition, as discussed further in Section 4.11, Land Use and Planning, the proposed project would be consistent with all applicable goals and policies contained in the County's General Plan Circulation Element and the Mead Valley Area Plan Circulation Element. Moreover, as discussed above, because the proposed project is being funded with grants under the State's Behavioral Health Continuum Infrastructure Program, "it is deemed consistent and in conformity with any applicable local plan, standard, or requirement" pursuant to Cal. Wel. & Inst. Code, §5960.3. As such, the proposed improvements are not mitigation measures required to reduce, eliminate, or avoid a significant environmental impact.

Based on the foregoing, the proposed project would not conflict with a program, plan, ordinance, or policy pertaining to transit, bicycle, and pedestrian facilities; therefore, impacts would be **less than significant**. No mitigation is required.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. As part of the *State CEQA Guidelines* 2019 updates, Section 15064.3 was added and codifies that project-related transportation impacts are typically best measured by evaluating the project's VMT. Specifically, subdivision (b) focuses on specific criteria related to transportation analysis and is divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. Subdivision (b)(1) provides guidance on determining the significance of transportation impacts of land use projects using VMT and states that projects located within 0.5 mile of high-quality transit should be considered to have a less than significant impact. Subdivision (b)(2) addresses VMT associated with transportation projects and states that projects that reduce VMT (e.g., pedestrian, bicycle, and transit projects) should be presumed to have a less than significant impact. Subdivision (b)(3) acknowledges that Lead Agencies may not be able to quantitatively estimate VMT for every project type. In these cases, a qualitative analysis may be used. Subdivision (b)(4) stipulates that Lead Agencies have the discretion to formulate a methodology that would appropriately analyze a project's VMT. The County adheres to the Riverside County Transportation Analysis Guidelines, which include the project screening criteria, VMT analysis methodology, recommended VMT metrics, and VMT impact thresholds. Therefore, the County's VMT guidelines were used in the evaluation of the proposed project's VMT impacts.

The County's VMT guidelines provide multiple screening criteria for land use projects within Riverside County. Projects that cannot be screened out by the screening criteria should conduct further VMT analysis to identify project-related VMT impacts. Two of the screening criteria included in the County's VMT guidelines are for Local Essential Services and Map-Based Screening. The County's VMT guidelines state the following:

(1) 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.

(2) Projects located in low VMT zones could be screened out from a detailed VMT analysis using the map-based screening tool using the Riverside County Transportation Model (RIVCOM) for projects within the County developed by the Western Riverside Council of Governments (WRCOG).

Local Essential Service. The proposed project is a local essential service that will provide behavioral care and related services to the local population in the Mead Valley-Perris-Menifee area of Riverside County. Although these services are currently available at different facilities located throughout western Riverside County, the integrated nature of the proposed project would provide these services locally to residents at a single location. Currently, residents in this area are required to travel approximately 10.5 miles, on average, to receive services at regional facilities in other locations within Riverside County (including Riverside and Hemet). Figure 2-1 provided in the Transportation Analysis (**Appendix H**) illustrates the locations of similar existing Riverside County facilities in Riverside, Hemet, San Jacinto, and Indio that local residents currently travel to for services that the Wellness Village will provide. Similarly, based on information from the Project Applicant about the existing residential programs and recovery residences, only one recovery residence is within the Mead Valley area, and one mental health urgent care unit is within 5 miles of the Mead Valley area. The majority of the trips and VMT for the proposed project would be visits from healthcare consumers utilizing the proposed medical facilities. By developing the proposed project in an area without such existing facilities and roughly equidistant to existing facilities, trips would be rerouted from other similar regional facilities farther away, resulting in shorter trip lengths for local residents to receive behavioral health care services. In addition, outpatient services on site will be primarily for those staying at the Wellness Village because there are two other community health centers in close proximity.

As mentioned above and described further in the Transportation Analysis, the proposed project would provide multiple behavioral health services currently available at different locations within Riverside County within a single campus. This means that patients will be able to receive a variety of behavioral health and related services in just one trip to the Wellness Village, rather than the current condition that requires patients to travel to multiple different locations to receive various services. Further, many patients at the Wellness Village will temporarily reside at the project site while receiving services, eliminating the need for routine travel between a residence and various medical appointments. The Wellness Village will provide a full continuum of behavioral health services. Once patients arrive at the Wellness Village, many will remain on site for up to 30 days without the need to travel off site at all. RUHS carefully designed the project site with necessary on-site services on the campus, so that consumers would not have to leave the project site during their stay. For example, various levels of outpatient services have been provided on site for consumer efficiency and to eliminate the need for traveling to multiple locations. In addition, food services would be provided for all residential programs, including the apartments, each of which are equipped with a kitchenette. Residents of the apartments are anticipated to visit the market on site for groceries and the cafeteria to purchase meals. Further, the proposed project would provide on-site vocational training, a Giving Store for consumers to obtain donated items (e.g., clothing), on-site haircut

facilities, a pet motel, and a gym. All of these services eliminate the need for off-site travel and would further reduce the overall VMT for the project.

In addition, patients from the Perris-Menifee-Mead Valley area who had to travel farther away to access care and treatment would instead use the proposed project. With the lack of local facilities currently available, residents need to drive to distant facilities to obtain necessary services.

Finally, based on the data at other similar Riverside County facilities (e.g., Arlington Recovery Community, Lago Crisis Residential Treatment Facility, and the Mental Health Rehabilitation Center), the majority of those staying at the proposed project will not have a personal vehicle; many are dropped-off at the facility and/or take public transit. A bus stop will be added on Harvill Avenue to support such transportation options, which will be served by the Riverside Transit Agency. Many Riverside County residents seeking healthcare services at the project will utilize the bus to access services. The project will also provide on-site transportation services for consumers via electrified golf carts to provide access to other buildings on campus as necessary. Additionally, given the proximity of the project to existing transit along Perris Boulevard, the Riverside Transit Agency may further extend/expand the existing regional transit network for better access to the project in the future. The project is approximately 0.6 mile from a High Quality Transit Area, which is defined by the SCAG as an area within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.

As such, with the integrated campus providing a multitude of services on site and the ability for patients to reside temporarily on site while receiving those services, the proposed project would reduce regional VMT by shortening trip lengths. As such, since the proposed project would provide services closer to the community, it is considered a Local Essential Service. Therefore, the proposed project is eligible to be screened out from any further VMT analysis pursuant to the Riverside Transportation Analysis Guidelines and would not result in a significant VMT impact.

Map Based Screening. The Riverside Transportation Analysis Guidelines state that projects located in low VMT zones could be screened out from a detailed VMT analysis. The Western Riverside Council of Governments (WRCOG) has developed a map-based screening tool using the Riverside County Transportation Model (RIVCOM) for projects within Riverside County. As such, by virtue of using the screening tool, the project could be evaluated whether it is within a low VMT zone. The low VMT zone is defined as an area where the average VMT is lower than the average VMT for the region. The input parameters include project location (parcel number), appropriate VMT metric, and VMT threshold. The output of the tool exhibits whether a project is within a low VMT zone.

As described further in the Transportation Analysis, the screening tool includes an option of using the VMT per service population metric, which accounts for all project-related trips, including employees and the customer base. The service population metric considers residents and commuters for any particular project. Additionally, currently the tool is configured to account for all project-related trips, including employees and the customer base for using the service population metric. This metric could also be used to evaluate the customer/patron-based projects, including the proposed project. The VMT per service population metric was used to evaluate the project location against the County threshold within the WRCOG Screening tool, as described in the Transportation Analysis. Figure 2-2 in the Transportation Analysis (**Appendix H**) illustrates the output of the tool and

indicates that the project is located within a low VMT zone using a VMT per service population metric. As such, the project could also be eligible to be screened out from a detailed VMT analysis by virtue of being located within a low VMT zone.

Because the proposed project would develop a Local Essential Service that would provide behavioral health care and facilities to the local population in the Mead Valley, Perris, and Menifee areas of Riverside County, the proposed project would be considered a Local Essential Service. In addition, the proposed project would be located within a low VMT zone. As such, the proposed project is eligible to be screened out from further VMT analysis. Therefore, based on the County's VMT guidelines, the proposed project would not result in any significant VMT impacts. Impacts would be **less than significant**, and no mitigation is required.

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

Less Than Significant Impact. Vehicle access to the project site would be provided via five driveways, including one from Placentia Avenue, two from Harvill Avenue, and two from Water Street. As part of the Transportation Analysis, a sight distance analysis, including stopping sight distance and corner sight distance analysis, was conducted at the project driveways along Placentia Avenue, Water Street, and Harvill Avenue. Sight distance is the length of the visible roadway from which a driver can see approaching vehicles before their line of sight is blocked by any object. According to the Caltrans Highway Design Manual (HDM), the stopping sight distance is the minimum sight distance along a roadway required to allow a driver to decrease their speed from the design speed to a complete stop. The corner sight distance is the minimum sight distance in which a driver at a stop-controlled approach can see oncoming traffic on the major street to safely maneuver onto the roadway.

The stopping sight distance was evaluated on the major roadways abutting the project site (i.e., Placentia Avenue, Water Street, and Harvill Avenue). The posted speed limit on Harvill Avenue is 50 mph, but there is currently no posted speed limit on Water Street and Placentia Avenue. A 25 mph speed limit was assumed for local streets with no posted speed limits; therefore, for the purpose of the analysis, a 25 mph speed limit has been assumed as the design speed for Water Street. Placentia Avenue is designated as a secondary roadway west of Harvill Avenue and as an arterial roadway east of Harvill Avenue in the County General Plan. For the purposes of the analysis, a design speed of 35 mph was assumed for Placentia Avenue. The minimum stopping sight distance is 430 feet for a design speed of 50 mph, 250 feet for a design speed of 35 mph, and 150 feet for a design speed of 25 mph. Therefore, the minimum stopping sight distance has been considered as 250 feet for the driveway along Placentia Avenue (Driveway 1), 150 feet for the two driveways along Water Street (Driveways 2 and 3), and 430 feet for the two driveways along Harvill Avenue (Driveways 4 and 5).

Although the HDM states that corner sight distance requirements are not applicable for urban driveways unless they are signalized, as a conservative approach, corner sight distances were also evaluated for the proposed driveways. The minimum corner sight distance was based on design speed, time gap, and type of vehicles from the minor roads (proposed driveways) to enter the major roads (Placentia Avenue, Water Street, and Harvill Avenue). Based on the requirements established in the HDM, it was determined that a minimum corner sight distance of 390 feet would be required

for left-turn maneuvers, and a minimum corner sight distance of 335 feet would be required for right-turn maneuvers coming out of Driveway 1. For Driveway 2 and Driveway 3, a minimum corner sight distance of 280 feet would be required for left-turn maneuvers, and a minimum corner sight distance of 240 feet would be required for right-turn maneuvers. Additionally, for Driveway 4 and Driveway 5, a minimum corner sight distance of 555 feet would be required for left-turn maneuvers, and a minimum corner sight distance of 480 feet would be required for right-turn maneuvers.

According to the Transportation Analysis, Driveway 1 would provide a sight distance of 390 feet for left- and right-turn maneuvers, Driveways 2 and 3 would provide a sight distance of 280 feet for left- and right-turn maneuvers, and Driveways 4 and 5 would provide a sight distance of 555 feet for left- and right-turn maneuvers. As such, all proposed driveways would provide adequate sight distances for left- and right-turn maneuvers and would not represent a hazard due to geometric design.

In addition, the Transportation Analysis analyzed driveway spacing to ensure there would be sufficient spacing between all existing and future intersections, including the proposed driveway intersections. Driveway 1 would be approximately 615 feet west of the Harvill Avenue/Placentia Avenue intersection, and Driveways 2 and 3 would be approximately 625 feet and 274 feet west of the Harvill Avenue/Water Street intersection, respectively. Driveways 4 and 5 would be approximately 305 feet and 660 feet south of the Harvill Avenue/Placentia Avenue intersection, respectively, and 930 feet and 585 feet north of the Harvill Avenue/Water Street intersection, respectively. As such, none of the proposed driveways would be within proximity of any existing and future intersections, and there would be sufficient spacing between all existing and future intersections, including the proposed driveway intersections.

All roadway frontage improvements in and around the project site would be designed and constructed to satisfy all County requirements for street widths, corner radii, and intersection control, as well as incorporate design standards tailored specifically to site access requirements. In addition, all final site plans would be subject to review and approval by the County's Engineering Department prior to issuance of building permits, and adherence to applicable requirements would ensure that the proposed development would not include any sharp curves, dangerous driveway intersections, or visual obstructions for drivers negotiating roadway curves. Therefore, impacts related to a substantial increase in hazards due to a design feature or incompatible use would be **less than significant**. No mitigation is required.

d. Result in inadequate emergency access?

Less Than Significant Impact. The proposed project would be required to design, construct, and maintain structures, roadways, and facilities that would provide for adequate emergency access and evacuation. Construction activities, which may temporarily restrict vehicular traffic, would be required to implement adequate and appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. Construction activities that could temporarily restrict vehicular traffic would incorporate appropriate measures, as described below, to facilitate the passage of persons and vehicles through/around any temporary road closures or lane closures in accordance with the California Fire Code as adopted by the County of Riverside Zoning Code and Regulations. As detailed in **SC TRA-1**, during construction, standard traffic control devices consistent with County requirements such as warning signs, warning lights, and flaggers would be utilized as

applicable to minimize obstructions and ensure the safe passage of emergency vehicles as necessary for the purposes of coordinating efforts during local, State, and/or federal emergency events, including response to hazardous materials incidents. Implementation of these traffic control measures will include guidance and navigational tools throughout the vicinity of the project site in order to maintain traffic flow and safety during construction.

During operation of the proposed project, vehicle access to the project site would be provided via five driveways, including one from Placentia Avenue, two from Harvill Avenue, and two from Water Street. Fire department access locations and design would be in accordance with the California Fire Code, Riverside County Ordinance 787, which sets dimensions for fire apparatus access roads, and Riverside County Fire Department standards to ensure proper roadway turning radii, fire lane widths, etc. Additionally, the proposed project's site plan includes provisions for emergency vehicle access, which also would be reviewed for adequacy by the County Fire Department.

New County facilities, including the proposed project, are required to develop an Emergency Action Plan, which contains information including but not limited to emergency evacuation procedures, a map that shows the locations of the building's emergency assembly areas, a building floor plan that shows emergency evacuation routes and the location of emergency equipment (e.g., fire extinguishers, fire alarm stations, emergency response kits), a list of pertinent safety personnel, including contact information, and department or building-specific emergency response procedures. Each facility is responsible for preparing site-specific evacuation plans. Although the project site is not located in a VHFHSZ, the project site is located near the eastern edge of a VHFHSZ; therefore, the project site has been designed to include multiple driveways that would allow for exit to what will be the primary evacuation route along Placentia Avenue east across bridges that traverse the railroad right-of-way and I-15. On-ramps to I-15 are also located 1.5 miles north of the project site at the Cajalco/Ramona Expressway and 1.5 miles to the south at the Harvill Avenue/Nuevo Road intersection. Evacuation of the project site would not exceed the capacity of the surrounding roadways such that those residences could not also evacuate the area to the east. In addition, emergency vehicles would not be obstructed from moving west through the project site to respond to a wildfire because Placentia Avenue is a two-way street that would be able to accommodate movement in both directions, including responders moving west and evacuees traveling east.

The proposed project would also be required to comply with all applicable codes and ordinances for emergency vehicle access, which would ensure adequate access to, from, and on site for emergency vehicles. Adherence to these codes and ordinances would ensure that construction and operation of the proposed project would not impair implementation of or physically interfere with the County's adopted Emergency Management Department's Emergency Operations Plan (EOP). Furthermore, because the proposed project would develop an Emergency Action Plan in accordance with the County's EOP, it would not substantially impair an adopted emergency response plan or emergency evacuation plan in the event of wildfire. Final site plans would be subject to review and approval by the County's Fire Department to ensure adequate emergency vehicle access to and within the project site prior to the issuance of building permits. With implementation of **SC TRA-1**, impacts related to inadequate emergency access would be **less than significant,** and no mitigation is required.

SC TRA-1 During construction activities that would temporarily restrict vehicular traffic (e.g., lane closures or partial lane closures) would be required to implement adequate and appropriate measures consistent with County of Riverside (County) requirements to facilitate the passage of persons and vehicles through/around any required road closures. Standard traffic control devices consistent with County requirements include, but are not limited to, warning signs, warning lights, and flaggers. These measures would be utilized as applicable to minimize obstructions and ensure the safe passage of emergency vehicles as necessary for the purposes of coordinating efforts during local, State, and/or federal emergency events, including response to hazardous materials incidents.

4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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:				
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	☐	☒	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant €suant 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

4.18.1 Impact Analysis

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:

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
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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant with Mitigation Incorporated. AB 52, PRC Section 21080.3.1, requires Lead Agencies to evaluate a project's potential to impact tribal cultural resources. Tribal cultural resources include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following: (a) [i]ncluded or determined to be eligible for inclusion in the California Register of Historical Resources [or] (b) [i]ncluded in a local register of historical resources as defined in subdivision (k) of [PRC] Section 5020.1." AB 52 also gives Lead Agencies the discretion to determine, as supported by substantial evidence, whether a

resource qualifies as a tribal cultural resource pursuant to the criteria set forth in PRC Section 5024.1(c). In applying the criteria set forth in Section 5024.1(c), the lead agency must consider the significance of the resource to a California Native American tribe. In addition, a cultural landscape that meets the criteria in subdivision (a), above, is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Finally, a historical resource described in PRC Section 21084.1, a unique archaeological resource as defined in PRC Section 21083.2(g), or a "nonunique archaeological resource" as defined in Section PRC 21083.2(h) may also be a tribal cultural resource if it conforms with the criteria of subdivision (a), above. AB 52 requires Native American consultation upon request by a California Native American tribe that has previously requested that the County provide it with notice of development projects.

At the direction of the County, LSA requested a Sacred Lands File search from the NAHC on August 30, 2023. On October 16, 2023, the NAHC responded indicating positive search results and requested that the County contact the Pechanga Band of Indians for more information. The response from the NAHC also included a list of Native American tribes who may also have knowledge of cultural resources in the vicinity of the project site.

Pursuant to AB 52, Riverside County Facilities Management maintains a database of interested Native American tribes and territorial maps that are used to provide notification based on the site location. The County notified the following tribes of the project on August 23, 2023 and again on July 21, 2023:

- Pala Band of Mission Indians
- Pechanga Band of Indians
- Ramona Band of Cahuilla
- Rincon Band of Luiseno Indians
- Soboba Band of Luiseno Indians

Michael Sullivan, Senior Environmental Planner with the County of Riverside coordinated the AB 52 notification. Of the tribes contacted, only the Pechanga Band of Indians (Pechanga) requested consultation. On October 17, 2023, the County began consultation with Pechanga. Although no specific tribal cultural resources were identified on the project site, Pechanga indicated the project site is very sensitive for tribal cultural resources with the potential for unidentified subsurface tribal cultural resources because there is a large area containing documented resources located west of the project site, extending to Lake Matthews. Pechanga also indicated there is a mapped resource in proximity to the project site. During consultation, Pechanga provided suggestions on mitigation measures in order to reduce potential impact on tribal cultural resources to less than significant levels. As a result, mitigation measures have been incorporated into the project. The County had an additional meeting with Pechanga on December 8, 2023, to verify the mitigation measures and to identify a path for completion of consultation prior to the circulation of the IS/MND. The County will continue to coordinate with the tribe during the circulation of the IS/MND to develop a monitoring and treatment agreement, and during construction of the project.

No other information or evidence has been provided to the County regarding any known or likely occurrence of tribal cultural resources on the project site. As previously discussed, Pechanga

provided suggestions on mitigation measures in the event of any inadvertent discoveries. Given there is the potential for the proposed project to inadvertently discover or unearth previously undocumented Native American tribal cultural resources during ground-disturbing activities, **MM TCR-1** through **MM TCR-9** are proposed.

Mitigation Measures. With implementation of **MM TCR-1** through **TCR-9** in accordance with PRC 21080.3.1 and PRC 21080.3.2, impacts to tribal cultural resources would be reduced to **less than significant** with mitigation incorporated.

MM TCR-1 Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all grading and trenching activities that may impact native soils on the project site. The Project Archaeologist shall have the authority to temporarily halt and redirect earthmoving activities within a minimum of 100 feet of the affected area in the event that suspected archaeological resources are unearthed during project construction. The project archeologist and the Consulting Tribes shall attend a pre-grading meeting with the County, the construction manager, and any contractors, and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The training will include: (a) a brief review of the cultural sensitivity of the project and the surrounding area; (b) what resources could potentially be identified during earthmoving activities; (c) the requirements of the monitoring program; (d) the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new construction personnel that will conduct earthwork or grading activities that begin work on the project following the initial training must take the Cultural Sensitivity Training prior to beginning work, and the Project Archaeologist and Consulting Tribe shall make themselves available to provide the training on an as-needed basis.

MM TCR-2 Prior to the issuance of a grading permit, the Developer shall secure agreements with the Pechanga Band of Indians (Pechanga) for tribal monitoring. The County of Riverside (County) is also required to provide a minimum of 30 days advance notice to Pechanga of all grading and trenching activities that may impact native soils. The Pechanga Tribal Representatives shall have the authority to temporarily halt and redirect earthmoving activities within a minimum of 100 feet of the affected area in the event that suspected archaeological resources are unearthed during project construction. Upon discovery of in situ archaeological resources, the parties shall promptly meet and confer, limit the closure area to the smallest reasonable area (including the possibility of reducing the stop-work radius to 50 feet after initial evaluation), and engage in good faith collaboration to execute the protocols outlined in the Cultural Resource Monitoring Plan (CRMP) for handling such unearthed resources.

MM TCR-3 Prior to the issuance of the grading permit, a CRMP is to be developed and provided to the Consulting Tribe for review. The Project Archaeologist, in consultation with the Consulting Tribe, the Contractor, and the County, shall develop a CRMP to

address the details, timing, and responsibility of all activities on the project site that may impact archaeological and tribal cultural resources. A Consulting Tribe is defined as a Tribe that initiated the Assembly Bill (AB) 52 tribal consultation process for the project, has not opted out of the AB 52 consultation process, and has completed AB 52 consultation with the County as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB 52. Details in the Plan shall include:

a. Project description and location;

b. Project grading and development scheduling;

c. Roles and responsibilities of individuals on the project;

d. The pre-grading meeting and Cultural Resources Worker Sensitivity Training details;

e. The protocols and stipulations that the Contractor, County, Consulting Tribe(s) and Project Archaeologist will follow in the event of inadvertent cultural resource discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resource's evaluation;

f. The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items;

g. Contact information of relevant individuals for the project.

MM TCR-4 The County shall verify that the following note is included on the Grading Plan:

> "If any suspected archaeological resources are discovered during ground-disturbing activities and the Project Archaeologist or Pechanga Tribal Representative are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Pechanga Tribal Representative to the site to assess the significance of the find."

MM TCR-5 If during ground-disturbance activities, unanticipated unique archaeological resources are inadvertently discovered that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to project approval, the following procedures shall be followed. This mitigation shall apply to inadvertent discoveries of resources, including those with multiple artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance as determined in consultation with the Consulting Tribe.

a. All ground disturbance activities within 100 feet of the discovered resources shall be halted until a meeting is convened between the Developer, the Project Archaeologist, the Pechanga Tribal Representative, and the County of Riverside Facilities Management to discuss the significance of the find.

b. At the meeting, the significance of the discover(ies) shall be discussed and, after consultation with the Pechanga Tribal Representative and the Project Archaeologist, a decision shall be made with the concurrence of the County, as to the appropriate process (documentation, recovery, avoidance, etc.) for the resources, including whether the stop-work radius from the discovered resource can be reduced to 50 feet.

c. Further ground disturbance, including but not limited to grading and trenching, shall not resume within the determined stop-work radius area of the discovery until the protocols for handling the resources has been established by all parties pursuant to the CRMP. Work shall be allowed to continue outside of the stop-work radius area and shall be monitored by Pechanga Tribal Monitors, if needed.

d. Treatment and avoidance protocols for the newly discovered resources shall be consistent with the CRMP and Monitoring Agreements entered into with Pechanga. These protocols may include avoidance of the resources through project design, in-place preservation of resources located in native soils, and/or re-burial on the project site with procedures so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/ Mitigation Measures.

e. If the find is determined to be unique and significant and avoidance of the area cannot be feasibly achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Consulting Tribe, and shall be submitted to the County for their review and approval prior to implementation of the said plan.

f. Pursuant to Calif. Pub. Res. Code § 21083.2(b), avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the Developer, Project Archaeologist, and the Consulting Tribe cannot agree on the significance of or the treatment for the archaeological or cultural resources, these issues shall be presented to the County of Riverside for decision. The County of Riverside shall make the determination based on the provisions of the California Environmental Quality Act (CEQA) with respect to archaeological resources, recommendations of the Project Archeologist, and shall consider the cultural and religious principles and practices of the Consulting Tribe. Notwithstanding any other rights available under the law, the decision of the County of Riverside shall be appealable to the County Board of Supervisors. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment finding.

MM TCR-6 In the event that Native American tribal cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:

a. One or more of the following treatments, in order of preference, shall be employed with Pechanga. Evidence that these procedures have been followed shall be provided to the County of Riverside:

1. **Preservation in place of the tribal cultural resources, if feasible.** Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.

2. **Reburial of the resources on the project property.** The measures for reburial shall include, at least, measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods, and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to Public Records Request.

3. **If preservation in place or reburial is not feasible then the resources shall be curated in a culturally appropriate manner at a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines.** The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial goods, and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV monitoring report. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment finding.

MM TCR-7 If human remains are discovered, no further disturbance shall occur within a minimum of 100 feet of the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California NAHC shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the Most Likely Descendant (MLD). The MLD shall then make recommendations and engage in consultations concerning the treatment of the remains (Calif. Pub. Res. Code § 5097.98). (GP Objective 23.3, CEQA).

MM TCR-8 It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 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).

MM TCR-9 Upon completion of ground-disturbing activities that impact native soils, the Project Archeologist shall submit two (2) copies of the Phase IV Cultural Resources Monitoring Report that complies with County of Riverside requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. Portions of the Phase IV Report may be confidential. The County shall review the reports to determine adequate treatment compliance. Provided the reports are adequate, the County shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the Eastern Information Center (EIC) at the University of California Riverside, and one (1) copy shall be submitted to the Pechanga Cultural Resources Department.

4.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. 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?	☐	☐	☒	☐
d. 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?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐		☐	☒

4.19.1 Impact Analysis

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

Water. Water service for the proposed project would be provided by the EMWD. EMWD provides potable water and recycled water services to an area of approximately 555 square miles in western Riverside County. The service area includes seven incorporated cities in addition to unincorporated areas of Riverside County, including the project site. The project site is located in a rapidly developing area of Riverside County with existing EMWD-owned water lines in the surrounding roads, including Placentia Avenue and Water Street. Development of the proposed project would require two water line connections, one to each of the respective existing water lines located in Placentia Avenue and Water Street. As indicated by EMWD, the existing water lines in Placentia Avenue, Water Street, and the surrounding area are sufficiently sized to serve the proposed project's expected water demand. Proposed improvements and interconnections to water lines in Placentia Avenue and Water Street would be installed simultaneously with grading activities and required roadway frontage improvements for the project site. As a result, interconnection to the existing utilities surrounding the site would not result in substantial disturbance of native habitat or soils, or existing roadways or utilities. There would be no significant environmental effects specifically related to the installation of utility interconnections that are not encompassed within the project's construction and operational footprint, and therefore already identified, disclosed, and subject to all

applicable mitigation measures, as well as local, State, and federal regulations, as part of this IS/MND.

Because the proposed project could be served by existing water supplies and no additional supply would be required, as discussed in further detail in Response 3.19(b), below, and the existing water infrastructure in the surrounding area is adequately sized to serve the proposed project, the proposed project would not require upgraded or expanded infrastructure, the construction of which would result in significant environmental effects. Therefore, the proposed project would result in less than significant impacts associated with water facilities, and no mitigation would be required.

Wastewater. The EMWD would also provide wastewater services to the project site. The EMWD has five active regional water reclamation facilities, which treat approximately 49 million gallons per day (mgd) of wastewater. EMWD's water reclamation facilities include the San Jacinto Valley, Moreno Valley, Perris Valley, Sun City, and Temecula Valley Regional Water Reclamation Facilities.[130] Wastewater generated by the proposed project likely would be treated at the Perris Valley Regional Water Reclamation Facility, which is the closest wastewater treatment facility to the project site (approximately 4.8 miles southeast). Table 4.19.A provides the typical daily flows, current capacity, and ultimate capacity of the five reclamation facilities. According to Table 4.19.A, the Perris Valley Regional Water Reclamation Facility currently has an available daily capacity of approximately 6.5 mgd of wastewater.

Table 4.19.A: Summary of Riverside County's Regional Water Reclamation Facilities (mgd)

Regional Water Reclamation Facility	Typical Daily Flow	Current Capacity	Typical Available Daily Capacity
San Jacinto Valley	7	14	7
Moreno Valley[1]	11.5	16	4.5
Perris Valley	15.5	22	6.5
Sun City	2.4	3	0.6
Temecula Valley	14	23	9
Total	**50.4**	**78**	**27.6**

Source 1: San Jacinto Valley Regional Water Reclamation Facility Fact Sheet (EMWD 2021).
Source 2: Moreno Valley Regional Water Reclamation Facility Fact Sheet (EMWD 2021).
Source 3: Perris Valley Regional Water Reclamation Facility Fact Sheet (EMWD 2021).
Source 4: Sun City Regional Water Reclamation Facility Fact Sheet (EMWD 2021).
Source 5: Temecula Valley Regional Water Reclamation Facility Fact Sheet (EMWD 2021).
[1] With the ability to divert approximately 2 million gallons per day to the Perris facility.
EMWD = Eastern Municipal Water District
mgd = million gallons per day

The project site is located in a rapidly developing area of Riverside County with existing wastewater lines in the surrounding streets. Existing EMWD-owned sewer infrastructure in the surrounding area does not have the capacity to serve the proposed project based on the existing sewer lines. As such, the proposed project would include off-site improvements to EMWD sewer infrastructure.

[130] Eastern Municipal Water District (EMWD). n.d. Wastewater Service. Website: https://www.emwd.org/wastewater-service (accessed September 18, 2023).

Specifically, the existing 8-inch-diameter sewer lines in Placentia Avenue, Water Street, and along West Frontage Road between Placentia Avenue and Water Street would be replaced with 10-inch-diameter sewer lines that connect to the existing 10-inch-diameter sewer line in West Frontage Road. This upgrade would accommodate the proposed project as well as other development in the area. The upgraded sewer lines would require trenching on Placentia Avenue and Water Street to place the lines below the surface, and minor off-site work along West Frontage Road to connect the sewer lines to existing connections on West Frontage Road. The upgrades would occur predominantly within existing right-of-ways, with one segment within an EMWD beneficial easement on private property. These areas have been previously disturbed during construction of the existing pipelines, and would not result in any new disturbance that may cause a significant environmental impact. In addition, construction activities associated with these off-site wastewater line improvements have been analyzed as part of the proposed project. As discussed throughout this IS/MND, construction of the proposed project, which includes the upgrades to sewer infrastructure in the area, would not result in any significant environmental impacts with incorporation of mitigation. Construction in the roadways would temporarily impact access on Placentia Avenue, Water Street, and West Frontage Road. However, any lane or partial road closures associated with construction would be properly noticed by the County and would require the implementation of traffic management practices, such as signage for directing through traffic and flagging to warn, detour, or direct traffic consistent with the County of Riverside requirements for temporary lane closures. The upgrades to the sewer lines would be the only infrastructure improvement required by EMWD. Once constructed, EMWD would have sewer infrastructure capacity to serve the Project.

The proposed project is anticipated to generate approximately 46,966,217 gpy (128,675 gallons per day [gpd]) of wastewater,[131] which represents less than 1 percent[132] of the typical daily wastewater flow that is received by the Perris Valley Regional Water Reclamation Facility and approximately 2 percent of that facility's currently available daily capacity (i.e., 6.5 mgd).[133] In addition, because the Perris Valley Regional Water Reclamation Facility is not operating at full capacity (i.e., 22 mgd), the facility is anticipated to be able to meet future wastewater treatment demands in addition to the proposed project without the need for additional sewer infrastructure upgrades or a new facility. As such, the project impacts related to the construction of wastewater treatment or collection facilities would be less than significant, and no mitigation would be required.

Stormwater Drainage. Under existing conditions, stormwater from the project site sheet flows to an existing catch basin at the corner of Placentia Avenue and Harvill Avenue (i.e., the northeast corner of the project site), where it then enters storm drains that flow into the San Jacinto River and discharges into Canyon Lake. Canyon Lake ultimately discharges into Lake Elsinore.[134]

The project site is currently undeveloped. Development of the proposed project would result in an increase in impervious surfaces on the project site from approximately 0 acre to approximately 14.4 acres (approximately 74 percent of the project site), which could decrease on-site infiltration and

131 In the absence of an official wastewater generate rate, wastewater can be reasonably assumed to be 90 percent of indoor water use (52,184,686 gpy x 0.9 = 46,966,217.4 gpy).
132 128,675 gpd / 15.5 mgd = 0.0083 percent
133 128,675 gpd / 6.5 mgd = 0.0198 percent
134 Personal communication with Kyle Koivuniemi, P.E. at Kimley-Horn on October 17, 2023.

increase the amount of stormwater entering the surrounding stormwater drainage system. With implementation of the proposed project, the project site would be divided into five drainage areas (i.e., DA 1 through DA 5) to manage stormwater runoff. The proposed project would also implement LID BMPs, including six bioretention basins, one modular wetland, and one underground detention basin. Flows from the bioretention basins, modular wetland, and underground detention basin would be directed off site via a storm drain pipe and discharged into an existing storm drain pipe in Placentia Avenue. The proposed drainage facilities would be designed in compliance with the MS4 Permit as detailed in **RCM HYD-3**. As discussed further in Section 4.10, Hydrology and Water Quality, the proposed drainage facilities and BMPs needed to accommodate stormwater runoff would be appropriately sized such that drainage facility capacity would not be exceeded during a design storm. In addition, construction activities associated with the proposed drainage facilities and BMPs have been analyzed as part of the proposed project. As discussed throughout this IS/MND, construction of the proposed project, which includes the proposed drainage facilities and BMPs, would not result in any significant environmental impacts with incorporation of mitigation. Therefore, the proposed project would not result in an exceedance of planned or existing stormwater drainage systems, and impacts would be **less than significant**. No mitigation would be required.

Electric Power. Electric power would be supplied to the project site by SCE. SCE provides electricity to more than 15 million people in a 50,000-square-mile area of Central, Coastal, and Southern California.[135] As discussed in Section 4.6, Energy, construction of the proposed project would require site preparation, grading, building construction, paving, and architectural coating activities. Construction of the proposed project would require energy for the manufacture and transportation of construction materials, preparation of the site for grading and building activities, and construction of the behavioral health campus. All or most of this energy would be derived from non-renewable resources. Energy consumption related to project operations would include transportation energy demands (energy consumed by service, employee, and resident vehicles), and building energy. In addition, the proposed project would include four emergency generators that would supply power to the project site in the event of a power shut off. According to the CEC, total electricity consumption in the SCE service area in 2021 was 81,129 gigawatt-hours (GWh)[136] and total electricity consumption in Riverside County in 2021 was 16,767 GWh (8,511 GWh for the residential sector and 8,257 GWh for the non-residential sector).[137] According to the CalEEMod estimates prepared for the project and included in **Appendix A**, the proposed project is anticipated to use approximately 6,430,037 kWh per year. Therefore, operation of the proposed project would increase annual electricity consumption in the SCE service area and Riverside County by less than 0.01 percent and less than 0.1 percent, respectively. Consequently, the proposed project's anticipated electricity consumption would be negligible (less than 1 percent) compared to the total consumption of the SCE service area and Riverside County. As such, the proposed project would not require the

135 Southern California Edison (SCE). 2021. Fact Sheets. Website: https://newsroom.edison.com/fact-sheets/fs (accessed September 2023).

136 California Energy Commission (CEC). n.d. Electricity Consumption by Entity. Website: http://www.ecdms.energy.ca.gov/elecbyutil.aspx (accessed September 2023).

137 California Energy Commission (CEC). n.d. Electricity Consumption by County. Website: http://www.ecdms.energy.ca.gov/elecbycounty.aspx (accessed September 2023).

relocation or construction of new or expanded electrical facilities or infrastructure, and impacts would be less than significant.

Electrical service to the project site would be facilitated through underground feeds through the site, and no overhead lines would be necessary. Two of the buildings would be serviced from Placentia Avenue via existing underground electrical infrastructure. In order to service the remaining buildings, the proposed project would include the construction of a new underground dry utility backbone in Harvill Avenue. With the exception of the Placentia Avenue connection and the Harvill Avenue backbone, most of the joint trench work would occur within the property site and be completed during the initial grading and utility phase of the project. In addition to electrical service, the joint trench would also incorporate all telecommunications and gas service provisions where applicable. As a result, interconnection to the existing electric power facilities surrounding the site would not result in substantial disturbance of native habitat or soils, or existing roadways or utilities. There would be no significant environmental effects specifically related to the installation of utility interconnections that are not encompassed within the project's construction and operational footprint, and therefore already identified, disclosed, and subject to all applicable mitigation measures, as well as local, State, and federal regulations, as part of this IS/MND. No mitigation is required.

Natural Gas. Natural gas in Riverside County is provided by SoCalGas. Riverside County does not have any natural gas storage facilities, and natural gas is provided through a network of gas transmission pipelines and distributed through existing mains that can be extended to serve new projects. Natural gas consumed in California is used for electricity generation (45 percent), residential uses (21 percent), industrial uses (25 percent), and commercial uses (9 percent). California continues to depend on out-of-state imports for nearly 90 percent of its natural gas supply.[138] SoCalGas provides natural gas to approximately 21.1 million people in a 24,000-square-mile service area throughout Central and Southern California, from Visalia to the Mexican border.[139] According to the CEC, total natural gas consumption in the SoCalGas service area in 2021 was 5,101 million therms (2,261 million therms for the residential sector).[140] Total natural gas consumption in Riverside County in 2021 was 430.8 million therms (144.2 million therms for the non-residential sector).[141]

The proposed project would include connections to the existing 2-inch-diameter gas lines located in the surrounding streets in order to provide natural gas for domestic hot water and kitchen cooking functions. All five buildings would utilize natural gas, with gas-fired boilers for domestic hot water (i.e., large water heater) being the primary demand. Three commercial kitchens would also require

138 California Energy Commission (CEC). 2023. Supply and Demand of Natural Gas in California. Website: https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california (accessed September 2023).

139 Southern California Gas Company (SoCalGas). 2020a. About SoCalGas. Website: https://www.socalgas.com/about-us/company-profile (accessed September 2023).

140 California Energy Commission (CEC). n.d. Gas Consumption by Entity. Website: https://ecdms.energy.ca.gov/gasbyutil.aspx (accessed September 2023).

141 California Energy Commission (CEC). n.d. Gas Consumption by County. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed September 2023).

natural gas usage for operation of stoves, ovens, fryers, and griddles. According to the CalEEMod estimates prepared for the project and included in **Appendix A**, the proposed project's total natural gas demand would be approximately 11,720,482 kBTU per year or approximately 117,233 therms per year. Therefore, operation of the proposed project would increase annual natural gas consumption in the SoCalGas service area and Riverside County by less than 0.01 percent and less than 0.1 percent, respectively. Consequently, the proposed project's anticipated natural gas usage would be negligible (less than 1 percent) compared to Riverside County's current natural gas usage. In addition, as previously discussed, the joint trench required for connection to electrical infrastructure would also incorporate all telecommunications and gas service provisions where applicable. As a result, interconnection to the existing natural gas facilities surrounding the site would not result in substantial disturbance of native habitat or soils, or existing roadways or utilities. There would be no significant environmental effects specifically related to the installation of utility interconnections that are not encompassed within the project's construction and operational footprint, and therefore already identified, disclosed, and subject to all applicable mitigation measures, as well as local, State, and federal regulations, as part of this IS/MND. Impacts would be less than significant, and no mitigation would be required.

Telecommunications. Cable, internet, and telephone services are provided to the Riverside County residents by major third-party purveyors. Cellular services provided by all major cellular networks are available in Riverside County. Construction activities associated with the proposed project would not increase the demand for telecommunications facilities. In addition, the proposed project would not involve the construction or relocation of new or expanded telecommunications facilities. In addition, as previously discussed, the joint trench required for connection to electrical infrastructure would also incorporate all telecommunications and gas service provisions where applicable. As a result, interconnection to the existing telecommunication facilities surrounding the site would not result in substantial disturbance of native habitat or soils, or existing roadways or utilities. There would be no significant environmental effects specifically related to the installation of utility interconnections that are not encompassed within the project's construction and operational footprint, and therefore already identified, disclosed, and subject to all applicable mitigation measures, as well as local, State, and federal regulations, as part of this IS/MND.

As discussed in Section 4.14, Population and Housing, the project is anticipated to result in a population increase of approximately 1,143 persons at the project site. This increase in population resulting from the proposed project comprises less than 0.1 percent of the County's 2022 population and does not represent a substantial increase in population. Further, the proposed project would be located in a rapidly developing area of Riverside County where the surrounding commercial and residential uses are currently served by telecommunications services. Therefore, implementation of the proposed project would result in no impact related to the construction or relocation of existing telecommunications facilities, and no mitigation would be required.

Overall, all proposed improvements and interconnections to drainage, electric power, water, and wastewater facilities would be installed simultaneously with grading activities and required roadway frontage improvements for the project site. Potential environmental impacts associated with grading and construction activities are discussed throughout this IS/MND and have been determined to be less than significant with the incorporation of mitigation. As a result, interconnection to the existing

utilities surrounding the site would not result in substantial disturbance of native habitat or soils, or existing roadways or utilities beyond what has been analyzed during project construction. There would be no significant environmental effects specifically related to the installation of utility interconnections that are not encompassed within the project's construction and operational footprint, and therefore already identified, disclosed, and subject to all applicable mitigation measures, as well as local, State, and federal regulations, as part of this IS/MND. Therefore, impacts related to relocation of utilities would be **less than significant**, and no additional mitigation is required.

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?

Less Than Significant Impact. As previously stated in Response 3.19(a), above, water service for the proposed project would be provided by the EMWD. EMWD water supplies consist of both local and imported water. Local supplies include groundwater and desalination efforts while imported water is purchased from the Metropolitan Water District of Southern California (MWD) through its Colorado River Aqueduct and its connections to the State Water Project. Operation of the proposed project would likely involve the use of both surface and groundwater sources for potable water. As previously discussed in Section 4.10, Hydrology and Water Quality, approximately 39 percent of the San Jacinto Groundwater Basin is adjudicated under three separate adjudications. EMWD would rely on existing groundwater entitlements to serve the proposed project's water needs and would not contribute to a substantial depletion of groundwater supplies. EMWD's 2020 UWMP indicates that it has sufficient water supplies to meet water demands through 2045, including during multiple dry years. In order to meet water demands for single and multiple dry years, EMWD has developed programs such as the planned Enhanced Recharge and Recovery Program (ERRP) project, which would allow EMWD to rely more heavily on groundwater supplies to meet demand in dry years. Additionally, EMWD could import more water from the MWD to meet increases in demand.

According to the 2020 UWMP, Riverside County's actual water supply and use (not including groundwater recharge or sales/transfers/exchanges to other agencies) in 2020 was 124,314 acre-feet and 84,673 acre-feet, respectively. The County's projected water supply and demand (not including groundwater recharge or sales/transfers/exchanges to other agencies) through 2045 is presented in Table 4.19.B. As shown in Table 4.19.B, the County's projected water supply is expected to increase through 2045. This increase in supply is attributed to EMWD's increased planning efforts for wastewater, water, and recycled water supplies and facilities. EMWD's expected future water supply projects and programs that have a quantifiable increase in supply are reasonably expected to be implemented over the next 25 years.[142] The County's projected water supply through 2045 during single and multiple dry years is presented in Table 4.19.C.

[142] Eastern Municipal Water District (EMWD). 2021a. *2020 Eastern Municipal Water District Urban Water Management Plan*. July.

Table 4.19.B: County Projected Water Use and Supply 2025-2045, Normal Year (acre-feet)

	2025	2030	2035	2040	2045
Total Projected Water Use	102,600	108,300	114,400	118,900	123,000
Total Projected Water Supply (Normal Year)	145,930	157,320	168,900	178,700	187,100

Source: Tables 4-3 and 6-15, *2020 Eastern Municipal Water District Urban Water Management Plan* (EMWD 2021a).

Table 4.19.C: County Projected Water Use and Supply 2025-2045, Single and Multiple Dry Years (acre-feet)

	2025	2030	2035	2040	2045
Total Projected Water Use	102,600	108,300	114,400	118,900	123,000
Total Projected Water Supply (Single Dry Year)	151,130	162,820	174,700	184,700	193,300
Total Projected Water Supply (Multiple Dry Years)					
Year 1	151, 130	162,820	174,700	184,700	193,300
Year 2	132,700	143,300	153,700	162,500	170,300
Year 3	134, 900	145,500	155,500	164,100	171,900
Year 4	137,100	147,600	157,400	165,700	173,500
Year 5	140,200	150,800	160,000	168,000	175,800

Source: Tables 4-3 and 6-15, *2020 Eastern Municipal Water District Urban Water Management Plan* (EMWD 2021).

As discussed previously, implementation of the proposed project would require utility connections to existing water lines in the surrounding area. According to the CalEEMod estimates prepared for the proposed project and included in **Appendix A**, the proposed project is anticipated to require approximately 52,184,686 gpy of indoor water use. EMWD also provided a preliminary domestic water consumption estimate for the proposed project of 20,342,780 gpy,[143] which is less than half of the estimate determined by CalEEMod. As such the proposed project's anticipated indoor water use determined by CalEEMod is a conservative estimate and represents a worst-case-scenario. The estimate determined by CalEEMod is predominantly based on default factors in the model that are intended to be applied to a variety of development types and uses. As such, the default factors are conservative and may not take into account project-specific water conservation practices that may be implemented during project operation that would reduce the anticipated water demand. In order to fully analyze the proposed project's potential impact on water supply, this analysis is based on the more conservative estimate of 52,184,686 gpy of indoor water use provided by CalEEMod.

In order to demonstrate that the proposed project's outdoor water use (e.g., for landscaping irrigation) does not exceed the State's Model Water Efficient Landscape Ordinance (MWELO), the MAWA for the proposed landscaping irrigation was calculated. The MAWA is the total amount of water usage allowed for landscaping irrigation use based on the project site's evapotranspiration

[143] Personal communication from Corey Wallace, PE, Director of Development Services at EMWD via email on December 13, 2023.

rate, the irrigation efficiency of the proposed irrigation system, and the water-use requirements of the proposed planting material. The MAWA for outdoor water use was determined to be approximately 4,397,086 gpy. EMWD also provided a preliminary irrigation estimate for the proposed project of 3,977,724 gpy,[144] which is slightly less than the MAWA estimate. As such, the proposed project's anticipated outdoor water use determined by the MAWA is a conservative estimate and represents a worst-case-scenario. In order to fully analyze the proposed project's potential impact on water supply, this analysis is based on the more conservative estimate of 4,397,086 gpy of outdoor water use.

In order to ensure that outdoor water use would not exceed this amount, the landscaping irrigation system would comply with the 2015 California MWELO Mandates per the Governor's EO B-29-15 for water efficient landscaping and all County of Riverside and EMWD specifications. The irrigation system will feature two dedicated irrigation water meters (1.5-inch water meters with 2-inch-diameter service lines) and correspondingly sized backflow preventors, flow sensors, and normally closed master valves as a part of its point of connection equipment. In addition, the irrigation system will be connected to a "smart" irrigation controller that will maximize efficiency with the capability to make real-time adjustments to the irrigation schedule to correspond with hourly weather updates. The controller will be equipped with a rain sensor device for automatic shut off when sufficient precipitation is detected. Shrub and groundcover landscape areas will utilize high-efficiency dripline irrigation to provide water directly to the plant's root zones with minimal water loss. Turf areas and water quality basins will feature pop-up spray irrigation utilizing the most efficient "matched-precipitation-rate" nozzles with even water distribution. Further, trees will utilize their own, stand-alone valves and be irrigated separately from shrub and groundcover areas using high efficiency pop-up bubblers and deep-root bubbler systems. The system and emitters will ensure delivery of water directly to the tree's root system with minimal water loss.

Based on the anticipated water demand for indoor and outdoor use, the total anticipated water usage at the project site is approximately 56,581,772 gpy, or 174 AFY. Based on EMWD's preliminary water demand calculations for the proposed project, the total anticipated water usage at the project site would be 24,320,504 gpy. Although EMWD anticipates less water demand for the proposed project than provided by CalEEMod and the MAWA, this analysis is based on the more conservative estimate of 56,581,772 gpy to analyze the most conservative scenario. The total anticipated water usage of 56,581,772 gpy accounts for approximately 0.1 percent of the projected water use and less than 0.1 percent of the projected water supply for Riverside County for 2045. As noted in Table 4.19.B, during normal dry years, the EMWD's projected water supply is expected to be between 151,130 AFY in 2025 and 193,300 AFY in 2045. In multiple dry years, the projected water supply is expected to be between 132,700 AFY in 2025 and 170,300 AFY in 2045. Because the proposed project's water use is consistent with the water demand that was contemplated in the General Plan and therefore in the 2020 UWMP, and the 2020 UWMP demonstrates that EMWD will have sufficient water supplies to meet projected water demands in normal, single dry and multiple dry years, the proposed project would have a less than significant impact on the availability of water supplies to

[144] Personal communication from Corey Wallace, PE, Director of Development Services at EMWD via email on December 13, 2023.

serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

Therefore, the proposed project's water demand would be within the EMWD's current and projected water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Further, the 2020 UWMP indicated that the EMWD has the ability to meet current and projected water demands through 2045 during normal, single-dry, and multiple-dry years using imported water from MWD with existing supply resources. Planned local supplies would complement imported supplies and improve reliability for the EMWD and the region.

Impacts related to water supplies would be **less than significant**, and no mitigation is required.

c. Would the project 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?

Less Than Significant Impact. As previously stated in Response 4.19(a), above, although the proposed project is anticipated to generate 128,675 gpd of wastewater, this total represents less than 1 percent of the daily treatment capacity at the wastewater treatment plant that would likely serve the project site. Consequently, the proposed project's anticipated wastewater generation would be negligible (less than 1 percent) compared to the treatment facility's available capacity, and the proposed project's wastewater flows can be accommodated within the existing design capacity of the wastewater treatment plant serving Riverside County. Additionally, wastewater generated from the proposed project would be typical of commercial wastewater flows in Riverside County.

In 2014, the EMWD completed the most recent expansion of the Perris Valley Regional Water Reclamation Facility and increased the facility's ultimate capacity to 100 mgd. With an ultimate capacity of 100 mgd, the facility is anticipated to meet the current and future demands of the region as well as help to meet the increasing demand for recycled water throughout EMWD's service area.

As previously discussed, existing EMWD-owned sewer infrastructure in the surrounding area does not have capacity to serve the proposed project based on the existing sewer lines. As such, the proposed project would include off-site improvements to EMWD sewer infrastructure. The existing 8-inch-diameter sewer lines in Placentia Avenue, Water Street, and along West Frontage Road between Placentia Avenue and Water Street would be replaced with 10-inch-diameter sewer lines that connect to the existing 10-inch-diameter sewer line in West Frontage Road. This upgrade would accommodate the proposed project as well as other development in the area. With these proposed improvements, the EMWD would have adequate capacity to serve the project's projected demand in addition to the providers' existing commitments. The proposed project would not result in the wastewater treatment plant exceeding wastewater treatment requirements. Therefore, impacts related to wastewater generation are less than significant, and no mitigation would be required.

d. 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?

Less Than Significant Impact. Solid waste generated within Riverside County is collected by the Riverside County Department of Waste Resources and delivered to one of Riverside County's five sanitary landfills: Badlands, Blythe, Desert Center, Lamb Canyon, and Oasis. Table 4.19.D summarizes the permitted maximum throughput, maximum permitted capacity, and remaining capacity of these landfill facilities. The closest landfills to the project site are the Badlands Sanitary Landfill (approximately 11.5 miles northeast of the project site) and the Lamb Canyon Sanitary Landfill (approximately 14 miles east of the project site). Solid waste generated at the project site is expected to be delivered to either the Badlands or Lamb Canyon Sanitary Landfill.

Table 4.19.D: Summary of the Riverside County Sanitary Landfills

Landfill	Location	Permitted Maximum Throughput (tpd)	Maximum Permitted Capacity (cy)	Remaining Capacity (cy)	Anticipated Closure Date
Badlands	31125 Ironwood Avenue Moreno Valley, CA 92555	5,000	82,300,000	7,800,000 as of 12/2020	01/01/2059
Blythe	1000 Midland Road Blythe, CA 92225	400	6,003,343	3,271,203 as of 07/2022	11/01/2052
Desert Center	17-991 Kaiser Road Desert Center, CA 92239	60	409,112	127,414 as of 11/2018	08/01/2107
Lamb Canyon	16411 Lamb Canyon Road Beaumont, CA 92223	5,000	39,681,513	19,242,950 as of 01/2015	04/01/2032
Oasis	84-505 84th Avenue Oasis, CA 92274	400	1,097,152	433,779 as of 10/2012	09/01/2055

Source 1: SWIS, Badlands Sanitary Landfill (33-AA-0006) (CalRecycle n.d.).
Source 2: SWIS, Blythe Sanitary Landfill (33-AA-0017) (CalRecycle n.d.).
Source 3: SWIS, Desert Center Sanitary Landfill (33-AA-0016) (CalRecycle n.d.).
Source 4: SWIS, Lamb Canyon Sanitary Landfill (33-AA-0007) (CalRecycle n.d.).
Source 5: SWIS, Oasis Sanitary Landfill (33-AA-0015) (CalRecycle n.d.).
CalRecycle = California Department of Resources Recycling and Recovery
cy = cubic yards
SWIS = Solid Waste Information System
tpd = tons per day

Construction of the proposed project would temporarily generate solid waste typical of construction sites including construction debris and solid waste generated by construction workers. As such, the solid waste generated at the project site during construction is anticipated to be minimal and is not anticipated to exceed State or local standards or the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals. Further, because the project site is undeveloped, there would be minimal amounts of demolition debris that would need to be hauled off site. As such, impacts associated with solid waste generation during construction would be less than significant.

Solid waste generated at the site would be typical of employee intensive developments and healthcare facilities, including food waste, plastic, glass, metals, paper, yard waste, and minimal amounts of biomedical waste. According to the CalEEMod estimates prepared for the project and included in **Appendix A**, operation of the proposed project would generate approximately 1,434 tons

per year or approximately 3.9 tons of solid waste per day during project operation. This represents less than 0.01 percent of the daily permitted maximum throughput for both the Badlands and Lamb Canyon Sanitary Landfills. In addition, as provided in Table 4.19.D, none of the County landfills are at or exceeding their permitted capacities, and a 0.01 percent increase in daily throughput for the Badlands and Lamb Canyon Sanitary Landfills is not anticipated to cause the landfills to exceed their permitted capacities. Therefore, solid waste generated by the proposed project would not cause the capacity of any of the landfills within Riverside County to be exceeded. The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure.

Moreover, the proposed project would be LEED-certified and would comply with Title 24 requirements, as well as applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), AB 939 (California Integrated Waste Management Act), AB 341, and other local, State, and federal solid waste disposal standards. Both AB 1327, Chapter 18 and AB 939 require the diversion of 50 percent of solid waste, including solid waste generated from residential, commercial, industrial, and public facility uses. AB 341 requires mandatory commercial recycling and focuses on increasing commercial waste diversion as a method of reducing GHG emissions. AB 341 is designed to achieve a reduction of 5 million MT CO_2e, which would require an additional 2 to 3 million tons of solid waste materials to be recycled from the commercial section by 2020 and beyond. With compliance with AB 1327, AB 939, AB 341, and all other applicable local, State, and federal solid waste disposal standards, implementation of the proposed project would not otherwise impair the attainment of California solid waste reduction goals. Therefore, the proposed project would result in a **less than significant impact** to solid waste and landfill facilities, and no mitigation would be required.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. Please refer to response to Response 3.19(d) above. **No impact** regarding conflict with federal, State, and local management reduction statutes and regulations related to solid waste would occur, and mitigation would not be required.

4.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
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?	☐	☐	☒	☐

4.20.1 Impact Analysis

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. According to CAL FIRE, the project site and immediate adjacent area is located within an LRA; however, it is not located within a VHFHSZ.[145] The closest SRA FHSZs are approximately 0.1 mile west of the project and are classified as VHFHSZ.[146] In addition, the closest LRA VHFHSZ is approximately 0.2 mile northwest of the project site.[147] Explosive fires can cast embers several miles ahead of the actual fire location. Design and construction of the project in accordance with the CBC and California Fire Code, which include design features such as ignition-resistant materials and incorporation of fire sprinklers, would minimize risk of exposure of persons or property to wildland fires. In addition, as discussed in Section 4.15, Public Services, the nearest fire station to the project site is Fire Station No. 59, Mead Valley, within Perris Battalion 1, which is located at 21510 Pinewood Street, approximately 2.3 miles northwest of the project site. The RCFD has adopted the NFPA Standard 1710 as a guideline for response times, which calls for an engine company response within 4 minutes of travel time to fire incidents and EMS calls and a full-fire-alarm group within 8 minutes of travel time for a minimum of 90 percent of annual incidents. Average travel time between the project site and the nearest fire station to the project site (i.e., Fire Station No. 59) is approximately 9 minutes. Through compliance with California Vehicle Code 21806(A)(1), which requires all vehicles to yield to emergency vehicles, travel time between Fire Station No. 59 and the project site is

[145] California Department of Forestry and Fire Protection (CAL FIRE). n.d. FHSZ Viewer. Website: https://egis.fire.ca.gov/FHSZ/ (accessed August 1, 2023).
[146] Ibid.
[147] Ibid.

expected to meet the NFPA Standard 1710 guideline for response time. Therefore, the RCFD is anticipated to be able to maintain appropriate response times and current levels of service provided to the project site following project implementation.

Construction activities that could temporarily restrict vehicular traffic would incorporate appropriate measures to facilitate the passage of persons and vehicles through/around any temporary road closures or lane closures in accordance with the California Fire Code as adopted by the County of Riverside Zoning Code and Regulations. During construction, standard traffic control devices such as warning signs, warning lights, and flaggers would be utilized as applicable to minimize obstructions and ensure the safe passage of emergency vehicles as necessary for the purposes of coordinating efforts during local, State, and/or federal emergency events, including response to hazardous materials incidents. Implementation of these traffic control measures will include guidance and navigational tools throughout the vicinity of the project site in order to maintain traffic flow and safety during construction.

The proposed project would include entry and exit points for emergency access from all perimeter streets. Fire department access locations and design would be in accordance with the California Fire Code, Riverside County Ordinance 787 (which sets dimensions for fire apparatus access roads), and Riverside County Fire Department Standards to ensure proper roadway turning radii, fire lane widths, etc. Additionally, the proposed project's site plan includes provisions for emergency vehicle access, which also would be reviewed for adequacy by the RCFD.

In August 2019, the Riverside County Board of Supervisors adopted the Riverside County Emergency Management Department's Emergency Operations Plan (EOP),[148] which includes critical elements of the Standardized Emergency Management System, the National Incident Management System, the Incident Command System, and the National Response Framework. The EOP is designed as a reference tool for local and regional agencies coordinating emergencies and serves as the foundation for response and recovery operations for Riverside County by establishing roles and responsibilities, assigning tasks, and specifying policies and general procedures. The plan includes critical elements of the Standardized Emergency Management System, the National Incident Management System, the Incident Command System, and the National Response Framework. The EOP provides a consistent framework for emergency management and includes management staff and employees, federal, State, and city governments, tribal governments, partner agencies, special districts, and school districts that serve County residents, and private and volunteer organizations involved in emergencies. In the event of an emergency that requires evacuation, the County uses alert systems, including Alert RivCo and Wireless Emergency Alerts (WEA), to notify the public and provide instructions on evacuation, including evacuation routes.[149] The proposed project would not interfere with the established roles and responsibilities, tasks, policies, and general procedures for management staff and employees, federal, State and city governments, tribal governments, partner agencies, special districts, and school districts that serve Riverside County residents, and private and volunteer organizations involved in emergencies as detailed in the EOP. In addition, employees,

148 Riverside County Emergency Management Department. 2019. *Emergency Operations Plan (EOP), Riverside County Operational Area (OA).* August.

149 Riverside County Emergency Management Department. n.d. Evacuations, Evacuation Planning. Website: https://rivcoready.org/disaster-preparedness/have-plan/evacuations (accessed November 9, 2023).

visitors, patients, and temporary residents would adhere to County emergency response and evacuation instructions in the event of an emergency. As such, the proposed project would not substantially impair an adopted emergency response plan or evacuation plan.

New County facilities, including the proposed project, are required to develop an Emergency Action Plan, which contains information including but not limited to emergency evacuation procedures, a map that shows the location of the building's emergency assembly areas, a building floor plan that shows emergency evacuation routes and the location of emergency equipment (e.g., fire extinguishers, fire alarm stations, emergency response kits), a list of pertinent safety personnel, including contact information, and department or building-specific emergency response procedure. Each facility is responsible for preparing site-specific evacuation plans. Although the project site is not located in a VHFHSZ, the project site is located near the eastern edge of a of a VHFHSZ, and therefore has been designed to include multiple driveways that would allow for exit to what will be the primary evacuation route along Placentia Avenue east across bridges that traverse the railroad right-of-way and Interstate 15 (I-15). On-ramps to I-15 are also located 1.5 miles north at Cajalco/Ramona Expressway and 1.5 miles to the south at Harvill Avenue/Nuevo Road. Evacuation of the project site would not exceed the capacity of the surrounding roadways such that those residences could not also evacuate the area to the east. In addition, emergency vehicles would not be obstructed from moving west through the project site to respond to the wildfire because Placentia Avenue is a two-way street that would be able to accommodate movement in both directions, including responders moving west and evacuees traveling east. In addition, the proposed project would include street improvements to Placentia Avenue, Harvill Avenue, and Water Street, including the paving of Water Street along the project frontage, which would improve vehicle access for employees, visitors, patients, and emergency vehicles.

The proposed project would also be required to comply with all applicable codes and ordinances for emergency vehicle access, which would ensure adequate access to, from, and on site for emergency vehicles. Adherence to these codes and ordinances would ensure that construction and operation of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Furthermore, because the proposed project would develop an Emergency Action Plan in accordance with the EOP, it would not substantially impair an adopted emergency response plan or emergency evacuation plan in the event of wildfire. **No impacts** would occur, and no mitigation is required.

b. 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?

Less Than Significant Impact. The project site is flat, and the surrounding area does not contain significant natural or manufactured slopes. The project site is generally surrounded by existing development; however, undeveloped land is located adjacent to the project site to the west, south, and east. In compliance with County Ordinances 695 and 772, which require abatement of hazardous vegetation, the adjacent vacant properties are managed to reduce risk and uncontrolled spread of wildfire.

Development of the proposed project at the project site would result in the reduction of vegetation and combustible materials necessary for the uncontrolled spread of wildfire because the proposed project would include vegetation removal and the construction of a behavioral health campus in accordance with the CBC and California Fire Code. In addition, similar to the project site, the adjacent undeveloped properties are mowed and/or disced for weed abatement, which reduces the amount of combustible vegetation that could help the spread of wildfire. Further, some of the existing surrounding development has been constructed in recent years and therefore has been designed and constructed in compliance with the CBC and California Fire Code, and likely include design features that reduce the risk of fire at those sites. As such, implementation of the proposed project would reduce the likelihood of a wildfire or the uncontrolled spread of a wildfire at the project site. Although the increase in on-site population at the project site could potentially increase the likelihood of a fire occurring at the site, the proposed project would be designed in accordance with the CBC and California Fire Code and include design features such as non-combustible materials, inclusive of structural steel, composite concrete decks and load-bearing metal studs, and incorporation of fire sprinklers, which would help reduce risk of fire at the project site. Furthermore, no wood framing would be utilized anywhere on the project site.

The proposed project itself would not exacerbate wildfire risks as compared to existing conditions because it would be similar to the scale of existing development in the area. Furthermore, the project site is not located in an SRA or classified as a VHFHSZ. Although the proposed project is approximately 0.1 mile east of an SRA VHFHSZ and approximately 0.2 mile southeast of an LRA VHFHSZ, due to the lack of slopes on site, the vegetation removal proposed as part of the proposed project and the development of the project site in accordance with the CBC and California Fire Code, the proposed project is not expected to exacerbate wildfire risks and thereby would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. In addition, buildings proposed as part of the project would be equipped with 95 percent efficient MERV-13 level air filters that would scrub the air coming into the building of pollutants. Employees, visitors, patients, and temporary residents would adhere to County emergency response and evacuation instructions in the event of a wildfire emergency. In the event of a wildfire emergency requiring evacuation, employees, visitors, patients, and temporary residents would be directed to the primary evacuation route along Placentia Avenue east across the railroad right-of-way and I-15. On-ramps to I-15 are also located 1.5 miles north at Cajalco/Ramona Expressway and 1.5 miles to the south at Harvill Avenue/Nuevo Road. Evacuation of the project site would not exceed the capacity of the surrounding roadways such that those residences could not also evacuate the area to the east. In addition, emergency vehicles would not be obstructed from moving west through the project site to respond to the wildfire because Placentia Avenue is a two-way street that would be able to accommodate movement in both directions, including responders moving west and evacuees traveling east. Therefore, impacts would be **less than significant**, and no mitigation is required.

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. The project is proposed with access driveways off perimeter streets that would provide entry and exit points for emergency access. Entrances and exits to and from the site would be clearly marked with appropriate directional signage. These driveways would facilitate additional access to the site for emergency fire apparatus. The project does require the minor extension of utilities for interconnection on site, but this is not expected to result in temporary or ongoing impacts to the environment beyond those identified, disclosed, and mitigated as necessary throughout this IS/MND. Further, the project site is not located in an SRA or classified as a VHFHSZ. Although the proposed project is approximately 0.1 mile east of an SRA VHFHSZ and approximately 0.2 mile southeast of an LRA VHFHSZ, due to the lack of slopes on site, the vegetation removal proposed as part of the proposed project and the development of the behavioral health campus in accordance with the CBC and California Fire Code, the proposed project is not expected to exacerbate wildfire risks. In addition, the EMWD indicated there is sufficient water flow in the 24-inch-diameter water line located in Harvill Avenue. As such, no additional physical improvements are anticipated to be necessary for fire flow purposes. Furthermore, design and construction of the project in accordance with the current CBC, which includes design features such as ignition-resistant materials and incorporation of fire sprinklers that would minimize any risk of exposure of persons or property to wildfires, would ensure that impacts remain less than significant. **Less than significant** impacts would occur, and no mitigation is required.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. The project site is not located within a Very High, High, or Moderate FHSZ, as designated by CAL FIRE.[150] Although the proposed project is approximately 0.1 mile east of an SRA VHFHSZ and approximately 0.2 mile southeast of an LRA VHFHSZ, due to the lack of slopes on site, the vegetation removal proposed as part of the proposed project and the development of the project site in accordance with the CBC and California Fire Code, the proposed project is not expected to exacerbate wildfire risks. The general topography of the project site and surrounding area is flat and not within an area potentially subject to earthquake-induced landslides.[151] Therefore, the risk of downslope or downstream flooding or landslides from wildfires during project construction and operation is expected to be minimal. The proposed project is not anticipated to result in substantial adverse impacts related to the risk of downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. **Less than significant** impacts would occur, and no mitigation is required.

[150] California Department of Forestry and Fire Protection (CAL FIRE). n.d. FHSZ Viewer. Website: https://egis.fire.ca.gov/FHSZ/ (accessed August 1, 2023).

[151] United States Geological Survey. n.d. *U.S. Landslide Inventory.* Website: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d. (Accessed August 22, 2023).

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

4.21.1 Impact Analysis

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant with Mitigation Incorporated. The proposed project's impacts to biological resources and cultural resources were analyzed in this IS/MND, and all direct, indirect, and cumulative impacts were determined to have no impact, a less than significant impact, or reduced to a less than significant impact with mitigation incorporated.

As discussed in Section 3.4, Biological Resources, the vegetation on the project site consists of nonnative grassland, and the project site does not contain any native habitat. No special-status plant species or special-status vegetation communities were observed within the project site during the field survey. However, the project site does provide suitable habitat for burrowing owl (*Athene cunicularia*) in the form of sparse, ruderal vegetation. Four surveys were conducted from July 12 to August 4, 2023, to look for burrowing owls, potential burrows (burrows greater than 11 centimeters in diameter and 150 centimeters deep), and signs of burrowing owls. The one burrow detected during the survey contained no burrowing owl or their sign. Therefore, no suitable burrowing owl burrows were observed during the focused surveys. Even though the focused burrowing owl surveys indicated the burrowing owl is currently absent from the site and habitat on the site is poor and isolated, there is a possibility that burrowing owl could visit the site from better habitat in the vicinity, or that conditions on the site could improve and burrowing owl could subsequently occupy

the site. As such, **MM BIO-1**, which requires a preconstruction survey within 30 days prior to the beginning of project-related ground disturbance, is prescribed and would ensure avoidance of any potential impact to burrowing owls. If burrowing owl is found during the preconstruction survey, the project proponent would need to inform the CDFW and USFWS immediately prior to initiating ground disturbance. With implementation of **MM BIO-1**, impacts to burrowing owl would be reduced to a less than significant level, and no additional mitigation is required. In addition, potential impacts to migratory and nesting birds would be reduced to a less than significant level with implementation of **MM BIO-2**.

As discussed in Section 3.5, Cultural Resources, development of the proposed project would not affect known historic archaeological resources. Although one resource consisting of a concrete foundation footing, an abandoned well, and landscaping trees was identified on the project site during the field survey, subsequent analysis determined that the resource would not meet the definition of a "historical resource" pursuant to CEQA. In addition, there are no known unique ethnic or cultural values associated with the project site, nor are known religious or sacred uses associated with the project site. Implementation of **MM CUL-1**, which requires an exclusionary buffer of 100 feet around any previously undocumented archaeological resources encountered during earthmoving activities, would reduce impacts to known, unknown, or potential cultural resources that may be located within the project site to less than significant levels.

Furthermore, as discussed in Section 3.18, Tribal Cultural Resources, the Pechanga indicated the project site is very sensitive for tribal cultural resources with the potential for unidentified subsurface tribal cultural resources because there is a large area containing documented resources located west of the project site, extending to Lake Matthews. The Pechanga also indicated there is a mapped resource approximately 840 feet from the project site. As such, the Pechanga provided suggestions on mitigation measures in the event of any inadvertent discoveries, including tribal monitoring of all grading and trenching activities, the development of a CRMP, and procedures to be followed if there is an inadvertent discovery at the site. Implementation of **MM TCR-1** through **MM TCR-9** in accordance with PRC 21080.3.1 and PRC 21080.3.2 would reduce impacts to previously unknown tribal cultural resources that may be located within the project site to less than significant levels.

Additionally, the Applicant is required to comply with CCR Section 15064.5(e), California Health and Safety Code Section 7050.5, and PRC Section 5097.98 as a matter of policy in the event human remains are encountered at any time. To ensure an exclusionary buffer of 50 feet around any encounter with human remains, **RCM CUL-1** is required. Adherence to **MM CUL-1, MM TCR-1 through MM TCR-9, and RCM CUL-1**, as well as regulations governing human remains, would reduce potential impacts to cultural and tribal cultural resources to less than significant levels.

With the aforementioned mitigation measures and regulatory compliance measures, impacts to biological resources and cultural resources would be **less than significant with mitigation incorporated**.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. The proposed project has either no impact, a less than significant impact, or a less than significant impact with mitigation incorporated with respect to all environmental issues pursuant to CEQA. Due to the limited scope of direct physical impacts to the environment associated with the proposed project, the project's impacts are primarily project specific in nature.

The cumulative effects resulting from build out of the County's General Plan were previously identified in the General Plan EIR. The County's General Plan and the Mead Valley Area Plan identify the designated land use for the project site as Business Park (BP) uses. The BP land use designation is intended for employee-intensive uses, including research and development, technology centers, corporate office, clean industry, and supporting retail uses. According to the County's Zoning Map, the project site is currently zoned as Manufacturing-Service Commercial (M-SC) and allows for service and commercial uses, including retail, office (specifically including medical office), health and exercise centers, restaurant and other eating establishments, vehicle repair shops, and laboratory use. Because the proposed project is a public health facility, employee-intensive land use, and provides for offices, facilities, and areas supporting the conduct of public, institutional, and health activities, the proposed project would be consistent with the intended use of the BP designation as detailed in the General Plan. Because of this consistency, the potential cumulative impacts of the proposed project are expected to be included within the impacts identified and discussed in the County's General Plan EIR.

The proposed project also includes temporary patient living facilities. Because the proposed patient living facilities would be temporary, and because they do not constitute a typical residential use, this inconsistency with the project site's General Plan and/or zoning designations is not anticipated to result in a significant cumulative impact. In addition, the proposed project is not subject to the zoning and general plan designations of the project site because the County owns the land and has plenary authority over entitlements and permitting for County-owned property. The County's authority is further supported by the BHCIP legislation (California Welfare & Institutions Code § 5960, et seq.), which provides that a project funded by BHCIP grants shall be deemed consistent and in conformity with any applicable local plan, standard, or requirement, and allowed as a permitted use within the zone in which the structure is located, and shall not be subject to a conditional use permit, discretionary permit, or to any other discretionary reviews or approvals. Therefore, the proposed project would have a less than cumulatively considerable impact.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant with Mitigation Incorporated. Based on the analysis provided throughout this IS/MND, with incorporation of mitigation measures and regulatory compliance measures, the proposed project would not result in any environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. Potential impacts on human beings would be less than significant with mitigation incorporated.

5.0 LIST OF PREPARERS

5.1 DRAFT IS/MND PREPARERS

5.1.1 LSA Associates, Inc.

The following individuals were involved in the preparation of the Draft IS/MND:

- Ryan Bensley, Principal in Charge
- Steve Letterly, Project Manager/Senior Environmental Planner
- Lauren Peachey, Environmental Planner
- Debmalya Sinha, Senior Transportation Planner
- Ambarish Mukherjee, Principal/Transportation
- Cara Cunningham, Senior Air Quality Specialist
- Bianca Martinez, Air Quality Analyst
- JT Stephens, Principal/Air and Noise
- Jeremy Rosenthal, Biologist
- Carla Cervantes, Assistant Biologist
- Riordan Goodwin, RA, Associate/Senior Cultural Resources Manager
- Jacob Biewer, Paleontologist
- Sarah Rieboldt, Ph.D., Associate/Paleontologist
- Matt Phillips, Graphics Technician
- Jason Thomas, Assistant Graphics Designer
- Meredith Canterbury, Senior GIS Specialist
- Beverly Inloes, Associate/Senior Technical Editor and Senior Word Processor

5.2 TECHNICAL REPORT PREPARERS

The following individuals were involved in the preparation of the technical reports in support of the Draft IS/MND. The nature of their involvement is summarized below.

5.2.1 LSA Associates, Inc.

The following individuals were involved in the preparation of the air quality calculations:

- Amy Fischer, President/COO
- Cara Cunningham, Senior Air Quality Specialist
- Bianca Martinez, Air Quality Analyst

The following individuals were involved in the preparation of the Transportation Analysis, Mean Valley Wellness Village Project, Unincorporated Riverside County, California:

- Dean Arizabal, Principal/Transportation
- Debmalya Sinha, Senior Transportation Planner
- Ravi Palakurthy, Senior Transportation Engineer
- Vyshnavi Shetty, Assistant Transportation Planner/Engineer

The following individual was involved in the preparation of the noise analysis and calculations:

- JT Stephens, Principal/Air and Noise

The following individuals were involved in the preparation of the Paleontological Resources Assessment for the Mead Valley Wellness Village Project, Unincorporated Riverside County, California:

- Jacob Biewer, Paleontologist
- Sarah Rieboldt, Ph.D., Associate/Paleontologist

The following individual was involved in the preparation of the Cultural Resources Assessment, Mead Valley Wellness Village, Vicinity of Perris, Riverside County, California:

- Riordan Goodwin, RA, Associate/Senior Cultural Resources Manager

The following individuals were involved in the preparation of the Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report, Mead Valley Wellness Village Project, Riverside County, California:

- Jeremy Rosenthal, Biologist
- Carla Cervantes, Assistant Biologist

5.2.2 Geotechnical Professionals Inc.

The following individuals were involved in the preparation of the Geotechnical Investigation, Proposed Behavioral Health Campus, Riverside University Health System, Perris Wellness Village, NEC Water Street and Harvill Avenue, Perris, California:

- Donald Cords, G.E., Principal
- James Harris V, P.E., Project Engineer

5.2.3 Partner Engineering and Science, Inc.

The following individual was involved in the preparation of the Phase I Environmental Site Assessment Report:

- Lang Schwarzberg, Principal

6.0 MITIGATION MONITORING AND REPORTING PROGRAM

6.1 MITIGATION MONITORING REQUIREMENTS

Public Resources Code (PRC) Section 21081.6 (enacted by the passage of Assembly Bill [AB] 3180) mandates that where significant effects have been identified, the following requirements shall apply to all reporting or mitigation monitoring programs:

- The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes that have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.

- The lead agency shall specify the location and custodian of the documents or other materials that constitute the record of proceedings upon which its decision is based.

- A public agency shall provide measures to mitigate or avoid significant effects on the environment that are fully enforceable through permit conditions, agreements, or other measures. Conditions of project approval may be set forth in referenced documents that address required mitigation measures or, in the case of the adoption of a plan, policy, regulation, or other project, by incorporating the mitigation measures into the plan, policy, regulation, or project design.

- Prior to the close of the public review period for a Draft Mitigated Negative Declaration (MND), a responsible agency, or a public agency having jurisdiction over natural resources affected by the project, shall either (1) submit to the lead agency complete and detailed performance objectives for mitigation measures that would address the significant effects on the environment identified by the responsible agency or agency having jurisdiction over natural resources affected by the project, or (2) refer the lead agency to appropriate, readily available guidelines or reference documents. Any mitigation measures submitted to a lead agency by a responsible agency or an agency having jurisdiction over natural resources affected by the project shall be limited to measures that mitigate impacts to resources that are subject to the statutory authority of, and definitions applicable to, that agency. Compliance or noncompliance with that requirement by a responsible agency or agency having jurisdiction over natural resources affected by a project shall not limit the authority of the responsible agency or agency having jurisdiction over natural resources affected by a project, or the authority of the lead agency, to approve, condition, or deny projects as provided by this division or any other provision of law.

6.2 MITIGATION MONITORING PROCEDURES

The mitigation monitoring and reporting program has been prepared in compliance with PRC Section 21081.6. It describes the requirements and procedures to be followed by the County of Riverside (County) to ensure that all mitigation measures adopted as part of the proposed Mead Valley Wellness Village Project (project) will be carried out as described in the Final IS/MND.

Table 6.A lists each of the mitigation measures (MM), regulatory compliance measures (RCM), and standard conditions (SC) specified in the Draft IS/MND and identifies the party or parties responsible for implementation and monitoring of each measure.

Table 6.A: Mitigation and Monitoring Reporting Program

Draft IS/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions		Responsible Party/Approving Agency	Timing for Mitigation Measure	Tracking
4.1: Aesthetics				
The proposed project would not result in any significant adverse impacts related to aesthetics. No mitigation is required.				
4.2: Agricultural and Forestry Resources				
The proposed project would not result in any significant adverse impacts related to agriculture and forestry resources. No mitigation is required.				
4.3: Air Quality				
The proposed project would not result in any significant adverse impacts related to air quality. No mitigation is required.				
4.4: Biological Resources				
MM BIO-1	Since suitable habitat is present, a pre-construction survey for burrowing owl will be required within 30 days prior to any ground-disturbing activities to avoid take of burrowing owls and occupied burrowing owl nests (MSHCP Species Specific Objective 6). If survey results are negative for burrowing owls during the 30 day preconstruction survey, project activities can proceed. If survey results are positive and burrowing owl is found within the project site, the project proponent will need to inform the California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) immediately. An experienced biologist will need to verify if any burrowing owls within the project site are breeding or wintering, and a non-disturbance buffer no less than 500 feet will be implemented and centered on the burrow(s) utilized. Burrowing owls should be allowed to leave the project site on their own accord if possible. Additional avoidance and minimization measures are not anticipated to be required by the wildlife resource agencies if non-disturbance buffers are maintained and burrowing owl are allowed to leave on their own accord. If burrowing owls cannot be avoided, a Determination of Biologically Equivalent or Superior Preservation (DBESP) will need to be prepared and submitted to the CDFW and USFWS for approval prior to ground-disturbing activities. Additionally, a Burrowing Owl Protection and Relocation Plan will need to be prepared detailing passive (e.g., use of one-way doors and collapse of burrows) and/or active (e.g., capturing owls, relocating to a new site, and collapse of burrows) relocation methods. The Burrowing Owl Protection and Relocation Plan will need to be submitted to the CDFW and USFWS for approval prior to initiating ground disturbance within the project site. Take of active burrowing owl nests shall be avoided during the nesting season (March 1–August 31). If burrowing owls are observed within the project site at any time during project activities, the wildlife agencies shall be notified immediately. Additional avoidance and minimization measures could be required by the wildlife resource agencies during the notification/document review process (e.g., exclusionary buffers, monitoring, or implementation of appropriate mitigation strategy).	Qualified Biologist / Director of Riverside County Facilities Management, or designee	Within 30 days prior to any ground-disturbing activities.	☐

Table 6.A: Mitigation and Monitoring Reporting Program

Draft IS/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions		Responsible Party/Approving Agency	Timing for Mitigation Measure	Tracking
MM BIO-2	**Nesting Bird Surveys.** In the event that vegetation removal takes place during the bird-nesting season (i.e., February 1–August 31), a qualified biologist shall conduct a nesting bird survey within 3 days prior to any construction activities beginning to ensure that birds are not engaged in active nesting within and around the project site. If nesting birds are discovered during preconstruction surveys, the biologist shall identify an appropriate buffer (i.e., up to 500 feet depending on the circumstances and specific bird species) within which no construction activities or other disturbances are allowed to occur until after the birds have fledged from the nest. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The results of the survey shall be documented and filed with the Environmental Permitting Department prior to construction.	Qualified Biologist / Director of Riverside County Facilities Management, or designee	Within 3 days prior to the initiation of any construction activities.	☐
4.5: Cultural Resources				
MM CUL-1	In the event previously undocumented archaeological resources are identified during earthmoving activities, further work in the area (within a 100-foot buffer) should be halted until a qualified archaeologist has assessed the nature of the find(s) and has determined the appropriate treatment.	Qualified Archaeologist / Director of Riverside County Facilities Management, or designee	During earthmoving activities	☐
RCM CUL-1	**Human Remains.** In the event that human remains are encountered on the project site, work within 100 feet of the discovery shall be redirected and the County of Riverside (County) Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the County shall consult with the MLD as identified by the NAHC and use commercially reasonable efforts to reach agreement upon a plan for treatment and protection or disposition of the remains. Prior to the issuance of grading permits, the County shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.	Construction Contractor and County Coroner / Director of Riverside County Facilities Management, or designee	During construction activities.	☐

Table 6.A: Mitigation and Monitoring Reporting Program

Draft IS/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions		Responsible Party/Approving Agency	Timing for Mitigation Measure	Tracking
4.6: Energy				
The proposed project would not result in any significant adverse impacts related to energy. No mitigation is required.				
4.7: Geology and Soils				
SC GEO-1	The Contractor shall provide evidence to the County of Riverside Plan Review Inspection for review and approval that on-site structures, features, and facilities have been designed and will be constructed in conformance with applicable provisions of the California Building Code (CBC) in effect at the time of construction and the recommendations cited in Section 6 of the project-specific Geotechnical Investigation (Appendix D 1 of this document). Geotechnical recommendations include, but are not limited to, the following: • Excavations will be required to remove undocumented fill and a portion of natural soils within the proposed building pads. • In areas to receive pavements and hardscape, it is recommended that the upper 1 foot be removed and replaced as properly compacted fill to provide uniform support. In addition, prior to placement of fill the subgrade should be scarified, moisture conditioned, and compacted. This condition shall be implemented to the satisfaction of the County of Riverside Deputy Building Official or designee.	Construction Contractor / County of Riverside Deputy Building Official, or designee.	Prior to the approval of grading and/or building permits.	☐
MM PAL-1	Prior to ground-disturbing activities, a qualified professional paleontologist who meets the standards set by the Society of Vertebrate Paleontology (SVP) shall be retained to develop and implement a Paleontological Resources Impact Mitigation Program (PRIMP) for this project. The PRIMP shall be reviewed and approved by the County of Riverside (County). The PRIMP shall adhere to the performance standards and practices from the SVP Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. These procedures shall include the methods that will be used to protect unique paleontological resources in the event of an unanticipated discovery within the project site, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of ground disturbance.	Qualified Paleontologist / Director of Riverside County Facilities Management, or designee	Prior to ground-disturbing activities.	☐
MM PAL-2	Ground-disturbing activities in deposits with high paleontological sensitivity (i.e., Very Old Alluvial Fan Deposits) shall be monitored by a qualified paleontological monitor following the PRIMP. No monitoring is required for excavation in deposits with no paleontological sensitivity (i.e., Artificial Fill). If paleontological resources are encountered during the course of ground disturbance, the paleontological monitor shall have the authority to temporarily redirect construction in a 50-foot radius of the find in order to assess its significance. In the event that paleontological resources are encountered when a paleontological monitor is not	Qualified Paleontologist / Director of Riverside County Facilities Management, or designee	During ground-disturbing activities.	☐

Table 6.A: Mitigation and Monitoring Reporting Program

Draft IS/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions		Responsible Party/Approving Agency	Timing for Mitigation Measure	Tracking
	present, work in the immediate area of the find shall be redirected and the paleontologist or paleontological monitor contacted to assess the find for scientific significance. If determined to be scientifically significant, the fossil shall be collected from the field. The qualified paleontological monitor shall follow the SVP's 2010 Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources if the resource requires salvage.			
MM PAL-3	Collected resources shall be prepared to the point of identification, identified to the lowest taxonomic level possible, catalogued, and curated into the permanent collections of a museum repository. At the conclusion of the monitoring program, a report of findings shall be prepared to document the results of the monitoring program.	Qualified Paleontologist/ Director of Riverside County Facilities Management, or designee	Conclusion of the monitoring program.	☐
4.8: Greenhouse Gas Emissions				
The proposed project would not result in any significant adverse impacts related to greenhouse gas emissions. No mitigation is required.				
4.9: Hazards and Hazardous Materials				
MM HAZ-1	The Contractor shall provide evidence to the County of Riverside for review and approval that the proposed project would implement the recommendations cited in the Phase I Environmental Site Assessment (ESA) prepared for the project site (Appendix F-1 of this document) as necessary. Recommendations include the following: • Implement a soil management plan to ensure that if the gasoline UST and/or petroleum impacted soils are encountered during construction of the proposed project, they are handled in accordance with State and local regulations. • If the former residential septic system is discovered during construction of the proposed project, it should be abandoned in accordance with State and local regulations. This measure shall be implemented to the satisfaction of the County of Riverside Deputy Building Official or designee.	Construction Contractor/ County of Riverside Deputy Building Official, or designee.	Prior to the approval of grading and/or building permits.	☐
4.10: Hydrology and Water Quality				
RCM HYD-1	Prior to the commencement of any land-disturbing activities, the Construction Contractor shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent for coverage under the permit to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTs). The Project Applicant shall provide the	Construction Contractor/ Director of Riverside County Facilities Management, or designee	Prior to the commencement of any land-disturbing activities.	☐

Table 6.A: Mitigation and Monitoring Reporting Program

	Draft IS/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/Approving Agency	Timing for Mitigation Measure	Tracking
	Waste Discharge Identification Number (WDID) to the Planning Manager of the Riverside County Planning Department or designee, to demonstrate proof of coverage under the Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the County of Riverside (County), or designee. A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared by a Qualified SWPPP Developer in accordance with the requirements of the Construction General Permit. These include: BMPs for erosion and sediment control, site management/housekeeping/waste management, management of non-stormwater discharges, run-on and runoff controls, and BMP inspection/maintenance/repair activities. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association's Stormwater Best Management Handbook: Construction. The SWPPP shall include a construction site monitoring program that identifies requirements for dry weather visual observations of pollutants at all discharge locations, and as appropriate (depending on the Risk Level), sampling of the site effluent and receiving waters. A Qualified SWPPP Practitioner shall be responsible for implementing the BMPs at the site and performing all required monitoring and inspection/maintenance/repair activities. Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTs.			
RCM HYD-2	During construction activities, the Construction Contractor shall implement BMPs to prevent or reduce the discharge of pollutants directly or indirectly into waters of the United States consistent with the requirements of Riverside County Ordinance No. 754.	Construction Contractor/ Director of Riverside County Facilities Management, or designee	During construction activities.	☐
RCM HYD-3	Prior to issuance of a grading permit, the Applicant shall submit a Final Water Quality Management Plan (WQMP) to the County for review and approval. The project shall implement project design features identified in the Final WQMP. The Final WQMP shall demonstrate that any proposed on-site development plan includes Best Management Practices (BMPs) for Source Control, Pollution Prevention, Site Design, Low Impact Development (LID) implementation, and Structural Treatment Control. BMPs shall be designed and implemented to address 303(d) listed pollutants and retain the project site's minimum design capture volume and hydromodification volume to ensure that post-development stormwater runoff volume or time of concentration does not exceed pre-development stormwater runoff by more than 10 percent of the 2-year peak flow in accordance with the Santa Ana Regional Water Quality Control Board Order No. R8-2010-	Applicant / Director of Riverside County Facilities Management, or designee	Prior to issuance of a grading permit.	☐

Table 6.A: Mitigation and Monitoring Reporting Program

Draft IS/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions		Responsible Party/Approving Agency	Timing for Mitigation Measure	Tracking
	0033, NPDES Permit No. CAS618033, as amended by Order No. R8-2013-0024 (Municipal Separate Storm Sewer System [MS4] Permit. The proposed LID BMPs specified in the Final WQMP shall be incorporated into the grading and development plans submitted to the County for review and approval. Periodic maintenance of any required BMPs and landscaped areas during project occupancy and operation shall be in accordance with the schedule outlined in the Final WQMP.			
RCM HYD-4	Prior to the commencement of any operational business activities, the Applicant shall register with the County's Business Storm Water Compliance Program for stormwater compliance, pursuant to Riverside County Ordinance No. 857.	Applicant / Director of Riverside County Facilities Management, or designee	Prior to issuance of a grading permit.	☐
4.11: Land Use and Planning				
The proposed project would not result in any significant adverse impacts related to land use and planning. No mitigation is required.				
4.12 Mineral Resources				
The proposed project would not result in any significant adverse impacts related to mineral resources. No mitigation is required.				
4.13: Noise				
The proposed project would not result in any significant adverse impacts related to noise. No mitigation is required.				
4.14: Population and Housing				
The proposed project would not result in any significant adverse impacts related to population and housing. No mitigation is required.				
4.15: Public Services				
The proposed project would not result in any significant adverse impacts related to public services. No mitigation is required.				
4.16: Recreation				
The proposed project would not result in any significant adverse impacts related to recreation. No mitigation is required.				
4.17: Transportation				
SC TRA-1	During construction activities that would temporarily restrict vehicular traffic (e.g., lane closures or partial lane closures) would be required to implement adequate and appropriate measures consistent with County of Riverside (County) requirements to facilitate the passage of persons and vehicles through/around any required road closures. Standard traffic control devices consistent with County requirements include, but are not limited to, warning signs, warning lights, and flaggers. These measures would be utilized as applicable to minimize obstructions and ensure the safe passage of emergency vehicles as necessary for the purposes of coordinating efforts during local, State, and/or federal emergency events, including response to hazardous materials incidents.	Construction Contractor / Director of Riverside County Facilities Management, or designee	During construction activities that would temporarily restrict vehicular traffic.	☐

Table 6.A: Mitigation and Monitoring Reporting Program

Draft IS/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions		Responsible Party/Approving Agency	Timing for Mitigation Measure	Tracking
4.18: Tribal Cultural Resources				
MM TCR-1	Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all grading and trenching activities that may impact native soils on the project site. The Project Archaeologist shall have the authority to temporarily halt and redirect earthmoving activities within a minimum of 100 feet of the affected area in the event that suspected archaeological resources are unearthed during project construction. The project archeologist and the Consulting Tribes shall attend a pre-grading meeting with the County, the construction manager, and any contractors, and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The training will include: (a) a brief review of the cultural sensitivity of the project and the surrounding area; (b) what resources could potentially be identified during earthmoving activities; (c) the requirements of the monitoring program; (d) the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new construction personnel that will conduct earthwork or grading activities that begin work on the project following the initial training must take the Cultural Sensitivity Training prior to beginning work, and the Project Archaeologist and Consulting Tribe shall make themselves available to provide the training on an as-needed basis.	Project Archaeologist / Consulting Tribe(s)	Prior to the issuance of grading permits.	☐
MM TCR-2	Prior to the issuance of a grading permit, the Developer shall secure agreements with the Pechanga Band of Indians (Pechanga) for tribal monitoring. The County of Riverside (County) is also required to provide a minimum of 30 days advance notice to Pechanga of all grading and trenching activities that may impact native soils. The Pechanga Tribal Representatives shall have the authority to temporarily halt and redirect earthmoving activities within a minimum of 100 feet of the affected area in the event that suspected archaeological resources are unearthed during project construction. Upon discovery of in situ archaeological resources, the parties shall promptly meet and confer, limit the closure area to the smallest reasonable area (including the possibility of reducing the stop-work radius to 50 feet after initial evaluation), and engage in good faith collaboration to execute the protocols outlined in the Cultural Resource Monitoring Plan (CRMP) for handling such unearthed resources.	Developer / Pechanga Tribal Representatives	Prior to the issuance of a grading permit.	☐
MM TCR-3	Prior to the issuance of the grading permit, a CRMP is to be developed and provided to the Consulting Tribe for review. The Project Archaeologist, in consultation with the Consulting Tribe, the Contractor, and the County, shall develop a CRMP to address the details, timing, and responsibility of all activities on the project site that may impact archaeological and tribal cultural resources. A Consulting Tribe is defined as a Tribe that initiated the Assembly Bill (AB)	Project Archaeologist / Consulting Tribe(s)	Prior to the issuance of the grading permit.	☐

Table 6.A: Mitigation and Monitoring Reporting Program

Draft IS/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions		Responsible Party/Approving Agency	Timing for Mitigation Measure	Tracking
	52 tribal consultation process for the project, has not opted out of the AB 52 consultation process, and has completed AB 52 consultation with the County as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB 52. Details in the Plan shall include: a. Project description and location; b. Project grading and development scheduling; c. Roles and responsibilities of individuals on the Project; d. The pre-grading meeting and Cultural Resources Worker Sensitivity Training details; e. The protocols and stipulations that the contractor, County, Consulting Tribe (s) And Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resource's evaluation; f. The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items; g. Contact information of relevant individuals for the Project.			
MM TCR-4	The County shall verify that the following note is included on the Grading Plan: "If any suspected archaeological resources are discovered during ground–disturbing activities and the Project Archaeologist or Pechanga Tribal Representative are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Pechanga Tribal Representative to the site to assess the significance of the find."	Applicant / Director of Riverside County Facilities Management, or designee	Prior to the issuance of the grading permit.	☐
MM TCR-5	If during ground-disturbance activities, unanticipated unique archaeological resources are inadvertently discovered that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to project approval, the following procedures shall be followed. This mitigation shall apply to inadvertent discoveries of resources, including those with multiple artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance as determined in consultation with the Consulting Tribe. a. All ground disturbance activities within 100 feet of the discovered resources shall be halted until a meeting is convened between the Developer, the Project Archaeologist, the Pechanga Tribal Representative, and the County of Riverside Facilities Management to discuss the significance of the find. b. At the meeting, the significance of the discover(ies) shall be discussed and after consultation with the Pechanga Tribal Representative and the Project Archaeologist, a decision shall be made, with the concurrence of the County of Riverside, as to the	Construction Contracto and Project Archaeologist / Consulting Tribe(s)	During all ground-disturbing activities.	☐

Table 6.A: Mitigation and Monitoring Reporting Program

Draft IS/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/Approving Agency	Timing for Mitigation Measure	Tracking
appropriate process (documentation, recovery, avoidance, etc.) for the resources, including whether the stop-work radius from the discovered resource can be reduced to 50 feet. c. Further ground disturbance, including but not limited to, grading and trenching, shall not resume within the determined stop-work radius area of the discovery until the protocols for handling the resources has been established by all parties pursuant to the CRMP. Work shall be allowed to continue outside of the stop-work radius area and shall be monitored by Pechanga Tribal Monitors, if needed. d. Treatment and avoidance protocols for the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with Pechanga. These protocols may include avoidance of the resources through project design, in-place preservation of resources located in native soils and/or re-burial on the Project site with procedures so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/Mitigation Measures. e. If the find is determined to be unique and significant and avoidance of the area cannot be feasibly achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Consulting Tribe, and shall be submitted to the County for their review and approval prior to implementation of the said plan. f. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the Developer, Project Archaeologist and the Consulting Tribe cannot agree on the significance of or the treatment for the archaeological or cultural resources, these issues shall be presented to the County of Riverside for decision. The County of Riverside shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the Project Archeologist and shall consider the cultural and religious principles and practices of the Consulting Tribe. Notwithstanding any other rights available under the law, the decision of the County of Riverside shall be appealable to the County Board of Supervisors. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment finding.			

Table 6.A: Mitigation and Monitoring Reporting Program

Draft IS/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions		Responsible Party/Approving Agency	Timing for Mitigation Measure	Tracking
MM TCR 6	In the event that Native American tribal cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries: a. One or more of the following treatments, in order of preference, shall be employed with Pechanga. Evidence that these procedures have been followed shall be provided to the County of Riverside: 1. **Preservation in place of the tribal cultural resources, if feasible.** Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources. 2. **Reburial of the resources on the project property.** The measures for reburial shall include, at least, measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods, and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to Public Records Request. 3. **If preservation in place or reburial is not feasible then the resources shall be curated in a culturally appropriate manner at a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines.** The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial goods, and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV monitoring report. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be	Construction Contractor, Qualified Archaeologist, and Pechanga Tribal Representatives / Director of Riverside County Facilities Management, or designee	During grading activities.	☐

Table 6.A: Mitigation and Monitoring Reporting Program

Draft IS/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions		Responsible Party/Approving Agency	Timing for Mitigation Measure	Tracking
	provided to County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment finding.			
MM TCR-7	If human remains are discovered, no further disturbance shall occur within a minimum of 100 feet of the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California NAHC shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the Most Likely Descendant (MLD). The MLD shall then make recommendations and engage in consultations concerning the treatment of the remains (Calif. Pub. Res. Code § 5097.98). (GP Objective 23.3, CEQA).	Construction Contractor and County Coroner / Director of Riverside County Facilities Management, or designee	During construction.	☐
MM TCR-8	It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 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).	County Coroner / Director of Riverside County Facilities Management, or designee	During and after reburial activities.	☐
MM TCR-9	Upon completion of ground-disturbing activities that impact native soils, the Project Archeologist shall submit two (2) copies of the Phase IV Cultural Resources Monitoring Report that complies with County of Riverside requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. Portions of the Phase IV Report may be confidential. The County shall review the reports to determine adequate treatment compliance. Provided the reports are adequate, the County shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the Eastern Information Center (EIC) at the University of California Riverside, and one (1) copy shall be submitted to the Pechanga Cultural Resources Department.	Project Archeologist / Director of Riverside County Facilities Management, or designee	Upon completion of ground-disturbing activities that impact native soils.	☐
4.19: Utilities and Service Systems				
The proposed project would not result in any significant adverse impacts related to utilities and service systems. No mitigation is required.				
4.19: Wildfire				
The proposed project would not result in any significant adverse impacts related to wildfire. No mitigation is required.				

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APPENDIX A

CALIFORNIA EMISSIONS ESTIMATOR MODEL (CALEEMOD)

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APPENDIX B

WESTERN RIVERSIDE COUNTY MSHCP CONSERVATION PLAN CONSISTENCY ANALYSIS AND BIOLOGY REPORT

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APPENDIX C

CULTURAL RESOURCES ASSESSMENT

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APPENDIX D-1

GEOTECHNICAL INVESTIGATION REPORT

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PALEONTOLOGICAL RESOURCES ASSESSMENT

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APPENDIX E

RIVERSIDE COUNTY CLIMATE ACTION PLAN (CAP) SCREENING TABLE

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PHASE I ENVIRONMENTAL SITE ASSESSMENT

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UST CLOSURE GUIDELINES

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APPENDIX G-1

LONG-TERM NOISE MONITORING SURVEY SHEETS

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APPENDIX G-2

CONSTRUCTION EQUIPMENT CALCULATIONS

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APPENDIX G-3

FHWA ROADWAY NOISE LEVEL ANALYSIS

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APPENDIX G-4

OPERATIONAL NOISE IMPACTS – SOUNDPLAN

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APPENDIX H

TRANSPORTATION ANALYSIS

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