

Initial Study/Mitigated Negative Declaration

for

“PrimeSpace Self-Storage”
(Formerly known as Temecula Valley Self-Storage)

Conditional Use Permit No. 190012 (CUP 190012)

Lead Agency:

County of Riverside
4080 Lemon Street, 12th Floor
Riverside, CA 92502
951-955-3200
Point of Contact: Blanca Bernardino. Assistant Planner
BBernardino@rivco.org

Project Proponent:

Chakrabarty, LLC
1003 E. Florida Avenue, Suite 101
Hemet, CA 92543
Point of Contact: Dr. Milan Chakrabarty
mschakmd@hotmail.com

Prepared by:

Matthew Fagan Consulting Services, Inc.
42011 Avenida Vista Ladera
Temecula, CA 92591
951.265.5428
Point of Contact: Matthew Fagan, Owner
matthewfagan@roadrunner.com

February 2025

TABLE OF CONTENTS

I.	Project Information	1
II.	Applicable General Plan and Zoning Regulations	11
III.	Environmental Factors Potentially Affected	16
IV.	Determination	16
V.	Environmental Issues Assessment	18
	<i>Aesthetics</i>	18
	1. Scenic Resources	18
	2. Mt. Palomar Observatory	21
	3. Other Lighting Issues	22
	<i>Agriculture & Forest Resources</i>	23
	4. Agriculture	23
	5. Forest	26
	<i>Air Quality</i>	27
	6. Air Quality Impacts	27
	<i>Biological Resources</i>	38
	7. Wildlife & Vegetation	38
	<i>Cultural Resources</i>	48
	8. Historic Resources	48
	9. Archaeological Resources	51
	<i>Energy</i>	54
	10. Energy Impacts	54
	<i>Geology Soils</i>	62
	11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones	62
	12. Liquefaction Potential Zone	63
	13. Ground-shaking Zone	64
	14. Landslide Risk	66
	15. Ground Subsidence	67
	16. Other Geologic Hazards	68
	17. Slopes	69
	18. Soils	71
	19. Wind Erosion and Blowsand from Project either on or off site	73
	<i>Greenhouse Gas Emissions</i>	74
	20. Greenhouse Gas Emissions	74
	<i>Hazards and Hazardous Materials</i>	77
	21. Hazards and Hazardous Materials	77
	22. Airports	83
	<i>Hydrology and Water Quality</i>	84
	23. Water Quality Impacts	84
	<i>Land Use and Planning</i>	96
	24. Land Use	96
	<i>Mineral Resources</i>	97
	25. Mineral Resources	97
	<i>Noise</i>	98
	26. Airport Noise	98
	27. Noise Effects by the Project	99
	<i>Paleontological Resources</i>	107
	28. Paleontological Resources	107
	<i>Population and Housing</i>	108

29. Housing	108
Public Services	109
30. Fire Services	109
31. Sheriff Services	110
32. Schools	111
33. Libraries	112
34. Health Services	113
Recreation	113
35. Parks and Recreation	113
36. Recreational Trails	114
Transportation	115
37. Transportation	115
38. Bike Trails	119
Tribal Cultural Resources	120
39. Tribal Cultural Resources	120
Utilities and Service Systems	122
40. Water	122
41. Sewer	127
42. Solid Waste	128
43. Utilities	131
Wildfire	135
44. Wildfire Impacts	135
Mandatory Findings of Significance	138
 VI. Earlier Analysis	 141
VII. Sources Cited	141

Figures

Figure 1	<i>Regional Location Map</i>	3
Figure 2	<i>Vicinity Map</i>	4
Figure 3	<i>Site Plan</i>	5
Figure 4	<i>Renderings</i>	6
Figure 5	<i>Landscape Plan</i>	7
Figure 6	<i>Aerial Photo</i>	10
Figure 7	<i>General Plan Land Use Designations</i>	14
Figure 8	<i>Zoning Classifications</i>	15
Figure 21-1	<i>Geotracker Site</i>	81
Figure 21-2	<i>Envirostor Site</i>	82
Figure 23-1	<i>WQMP Site Plan</i>	88

Tables

Table 6-1	<i>South Coast Air Basin Attainment Status</i>	29
Table 6-2	<i>SCAQMD Regional Significance Thresholds</i>	30
Table 6-3	<i>Regional Construction Emissions</i>	30
Table 6-4	<i>Regional Operational Emissions</i>	32
Table 6-5	<i>SCAQMD Localized Significance Thresholds (LST)</i>	33
Table 6-6	<i>Localized Construction Emissions – Unmitigated</i>	33
Table 6-7	<i>Localized Operational Emissions</i>	35

Table 8-1 Recorded Cultural (Historical) Resources in the Project Area.....	49
Table 9-1 Recorded Cultural (Archaeological) Resources in the Project Area	52
Table 10-1 <i>Construction Off-Road Equipment Energy Demand</i>	56
Table 10-2 <i>Construction On-Road Trips Energy Demand</i>	57
Table 10-3 <i>Project Construction Energy Demand</i>	58
Table 10-4 <i>Annual Motor Vehicle Fuel Consumption Upon Full Operation</i>	59
Table 10-5 <i>Annual Electricity Consumption Upon Full Buildout</i>	59
Table 10-6 <i>Annual Natural Gas Consumption Upon Full Buildout</i>	60
Table 10-7 <i>Project Consistency with the Riverside County Energy Efficiency Strategies</i>	61
Table 13-1 <i>Active Faults within 30 Miles of the Project Site</i>	65
Table 20-1 <i>Construction Greenhouse Gas Emissions</i>	75
Table 20-2 <i>Operational Greenhouse Gas Emissions</i>	76
Table 23-1 <i>Local Receiving Bodies and Pollutants of Concern</i>	86
Table 23-2 <i>Onsite Drainage Management Areas</i>	87
Table 23-3 <i>Site Runoff Condition</i>	91
Table 27-1 <i>Riverside County Noise/Land Use Compatibility Standards</i>	100
Table 27-2 <i>Riverside County Noise Ordinance Standards</i>	101
Table 27-3 <i>Short-Term Noise Measurement Results</i>	102
Table 27-4 <i>Project Construction Noise Levels – Western Property Line</i>	103
Table 27-5 <i>Project Construction Vibration Impacts</i>	106
Table 37-1 <i>Project Trip Generation</i>	117

APPENDICES

(Provided Electronically)

Appendix A: *Map My County*

Appendix B: *Temecula Valley Self Storage Air Quality and Greenhouse Gas Impact Study*, prepared by RK Engineering Group, Inc., 1-15-2021

Appendix C1: *Burrowing Owl with a Discussion of Planning Species and Biological Issues*, prepared by Joan R. Callahan, Ph.D., 6-23-2010

Appendix C2: *HANS 2015, JPR 10-07-26-01*, prepared by Regional Conservation Authority, 8-09-2010

Appendix D: *Update to Historical/Archaeological Resources Survey Report Assessor's Parcel Number 476-010-060*, prepared by CRM TECH, 10-7-2020

Appendix E1: *Geotechnical Interpretive Report Proposed RV and Boat Storage*, prepared by Earth Strata Geotechnical Services, Inc., 9-14-2020

Appendix E2: *Infiltration Testing for Water Quality Treatment Areas, Proposed Commercial Development, Assessor Parcel Number 476-010-060, Located on the South West Corner of Winchester Road and Keller Road, City of Winchester, Riverside County, California*, prepared by Earth Strata Geotechnical Services, Inc., 11-8-2021

Appendix E3: *Onsite Wastewater Treatment System Report and Design for Onsite Water Treatment Utilizing an Advanced Treatment System (ATS), Proposed Commercial Development, Assessor Parcel Number 476-010-060, Located on the South West Corner of Winchester Road and Keller Road, City of Winchester, Riverside County, California*, prepared by Earth Strata Geotechnical Services, Inc., 8-10-2024

Appendix F: *Paleontological Resources Assessment Report Temecula Valley (Keller Road) Self-Storage Project*, prepared by CRM TECH, 10-5-2020

Appendix G1: *Project Specific Water Quality Management Plan for Temecula Valley Self-Storage*, prepared by The Prizm Group, 6-15-2022

Appendix G2: *Temecula Valley Mini Storage CUP 190012 SWC Keller Road and Winchester Road, Preliminary Hydrology Analysis*, prepared by The Prizm Group, 4-7-2022

Appendix H: *Temecula Valley Self-Storage Noise Impact Study*, prepared by RK Engineering Group, Inc., 1-15-2021

Appendix I: *Project Plans*, 2-2025

Appendix J: *Site Photos*, prepared by Matthew Fagan Consultants, Inc., 9-17-2020

Appendix K: *Temecula Valley Self Storage Noise and Air Quality, and GHG Analysis Supplemental Letter*, prepared by RK Engineering Group, Inc., 10-9-2020

Appendix L: *SAN 53 – WS20230000929 - APN: 476-010-060*, prepared by EMWD, 8-15-2023

Appendix M: *Temecula Valley Self-Storage Project*, prepared by Specialized Utilities Services Program (SUSP) Engineering, 5-2024, with *Preliminary Technical Report (PTR) with State Resources Control Board, Division of Drinking Water Preliminary Review* 6-19-2024

Commonly Used Abbreviations and Acronyms

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
AC	Acre
ACOE	U.S. Army Corps of Engineers
ADP	Area Drainage Plans
ADT	Average Daily Traffic
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	Above Mean Sea Level
APN	Assessor's Parcel Number
AQ/GHG	Air Quality/Green House Gas
AQMP	Air Quality Management Plans
ARB	Air Resources Board
Basin	South Coast Air Basin
BMPs	Best Management Practices
BUOW	Burrowing Owl
CAAQS	California Ambient Air Quality Standards
CalARP	California Accidental Release Prevention Program
CalEEMod™	California Emissions Estimator Model™
Cal/EPA	California Environmental Protection Agency
CalFire	Riverside County Fire Department
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CUP	Conditional Use Permit
CZ	Change of Zone
dB	Decibel
dBA	A-Weighted Decibel
dBA CNEL	A-weighted decibel Community Noise Equivalent Level
dBA Leq	A-weighted decibel equivalent noise level
EAP	Existing Plus Ambient Growth Plus Project
EAPC	Existing Plus Ambient Growth Plus Project Plus Cumulative

FEMA	Federal Emergency Management Act
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping & Monitoring Program
GHG	Greenhouse Gas
GP	General Plan
GPA	General Plan Amendment
GPEIR	General Plan Environmental Impact Report
HCM	Highway Capacity Manual
HCOC	Hydrologic Conditions of Concern
HCP	Habitat Conservation Plan
HOV	High-Occupancy Vehicle
HRA	Health Risk Assessment
LOS	Level of Service
LST	Localized Significance Thresholds
MLD	Most Likely Descendent
MM	Mitigation Measure
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
MTCO _{2e}	Metric Tons of Carbon Dioxide Equivalent
N ₂ O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NEPSSA	Narrow Endemic Plants Survey Area
NO ₂	Nitrogen Dioxide
NOA	Naturally Occurring Asbestos
NO _x	Oxides of Nitrogen
NPDES	National Pollution Discharge Elimination System
O ₃	Ozone
Pb	Lead
PFCs	Perfluorocabons
PHS	Preliminary Hydrology Study
PM	Afternoon
PM _{2.5}	Fine Particulate Matter
PM ₁₀	Respirable Particulate Matter
Ppb	Parts Per Billion
Ppm	Parts Per Million
PPV	Peak Particle Velocity
PRC	Public Resources Code
PVC	Polyvinyl Chloride
PV	Photovoltaic

RCFC&WCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCIP	Riverside County Integrated Project
RCSD	Riverside County Sheriff's Department
RCTC	Riverside County Transportation Commission
RTA	Riverside Transit Authority
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RV	Recreational Vehicle
RWQCB	Regional Water Quality Control Board
SARWQCB	Santa Ana Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SO ₂	Sulphur Dioxide
SO _x	Sulphur Oxides
SoCAB	South Coast Air Basin
Sq. Ft.	Square Feet
TAC	Toxic Air Contaminant
USFWS	United States Fish and Wildlife Service
USGS	U.S. Geological Survey
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VPD	Vehicles Per Day
WQMP	Water Quality Management Plan

COUNTY OF RIVERSIDE

ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Environmental Assessment (CEQ / EA) Number: CEQ190075

Project Case Type (s) and Number(s): Conditional Use Permit No. 190012 (CUP 190012)
"PrimeSpace Self-Storage" (Formerly known as Temecula Valley Self-Storage)

Lead Agency Name: Riverside County Planning Department

Address: P.O. Box 1409, Riverside, CA 92502-1409

Contact Person: Blanca Bernardino, Assistant Planner

Telephone Number: 951-955-6503

Applicant's Name: J. Craig Manning

Applicant's Address: 1931 Newport Blvd., Suite M, Costa Mesa, CA 92627

Applicant's Phone Number: 714-543-8352

I. PROJECT INFORMATION

Project Description:

Overview

The proposed Project includes a Conditional Use Permit No. 190012 (CUP 190012) on one (1) parcel totaling approximately 4.6 net acres and 6.98 gross acres. The site is bounded by Keller Road to the north and Winchester Road to the east, in the County of Riverside, State of California. Reference **Figure 1, Regional Location Map** and **Figure 2, Vicinity Map**. It should be noted that the current proposed name for this storage facility is PrimeSpace Self-Storage; however, it was formerly known as Temecula Valley Self-Storage and then briefly as Space-X Self-Storage. Therefore, the proposed name on some reports and plans may not reflect the PrimeSpace Self-Storage title.

Conditional Use Permit No. 190012

Conditional Use Permit No. 190012 (CUP 190012) is a proposal to construct a 125,781 square foot self-storage facility on a 6.98 gross acre lot. The Project will include a total of eight buildings: one 1,172 square foot office building and seven storage buildings ranging in size from 1,525 square feet to 76,744 square feet. Three of these buildings will provide 20 parking spaces for RV storage. In addition to these interior spaces, there will be 32 available outdoor recreational vehicle (RV) and boat parking spaces. The Project will be open 7 days a week between the hours of 8:00 a.m. to 6:00 p.m., and there will be no more than 4 employees overseeing the site operations per shift. There are 7 standard parking spaces, including 1 Americans with Disabilities Act (ADA) space and 1 electric vehicle (EV) space, and 3 additional spaces dedicated to loading and unloading. Reference **Figure 3, Site Plan**.

Building Architecture and Materials

The Temecula Valley Storage architectural design is intended to blend harmoniously with the nature of the surrounding area while providing a more current, pleasing aesthetic. Reference **Figure 4, Renderings** and Project Plans (**Appendix I**).

Landscaping

Project landscaping includes drought tolerant plant species. Trees are of evergreen and deciduous varieties. Landscape is provided along the Project perimeters, roadways, and around water quality basins. Approximately 35,631 sq. ft., or 17.33% of the Project is landscaped, plus the right-of-way landscaping adds another 24,676 sq. ft. Reference **Figure 5, Landscape Plan**.

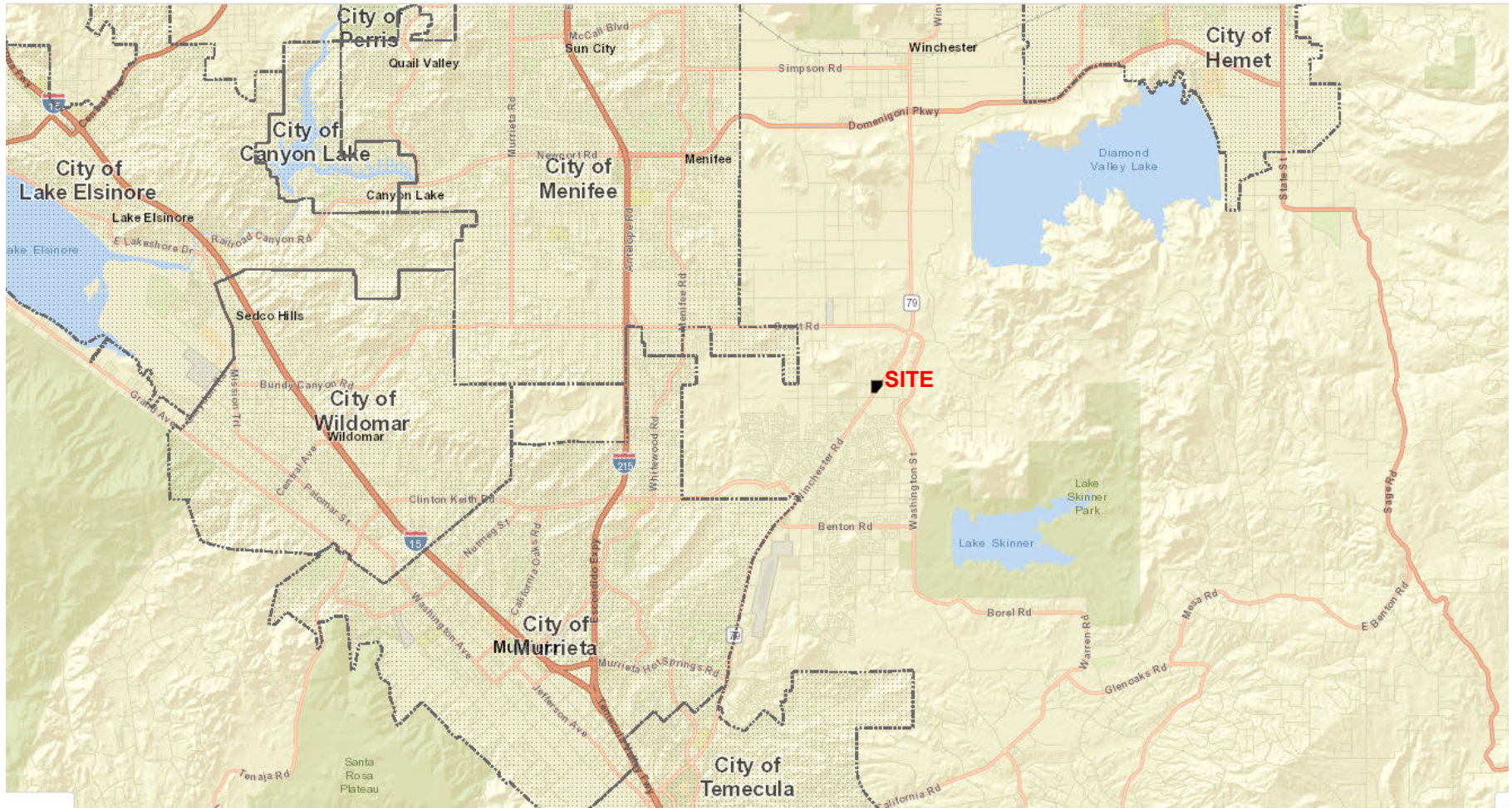
Circulation

The proposed Project will take access off Keller Road. There is one ingress/egress provided into the main storage facility area off of Keller Road. Keller Road at the Project entry will need to be lowered to match the existing, eastern portion of the roadway. Pedestrian access is provided per ADA requirements.

Renewable Energy System

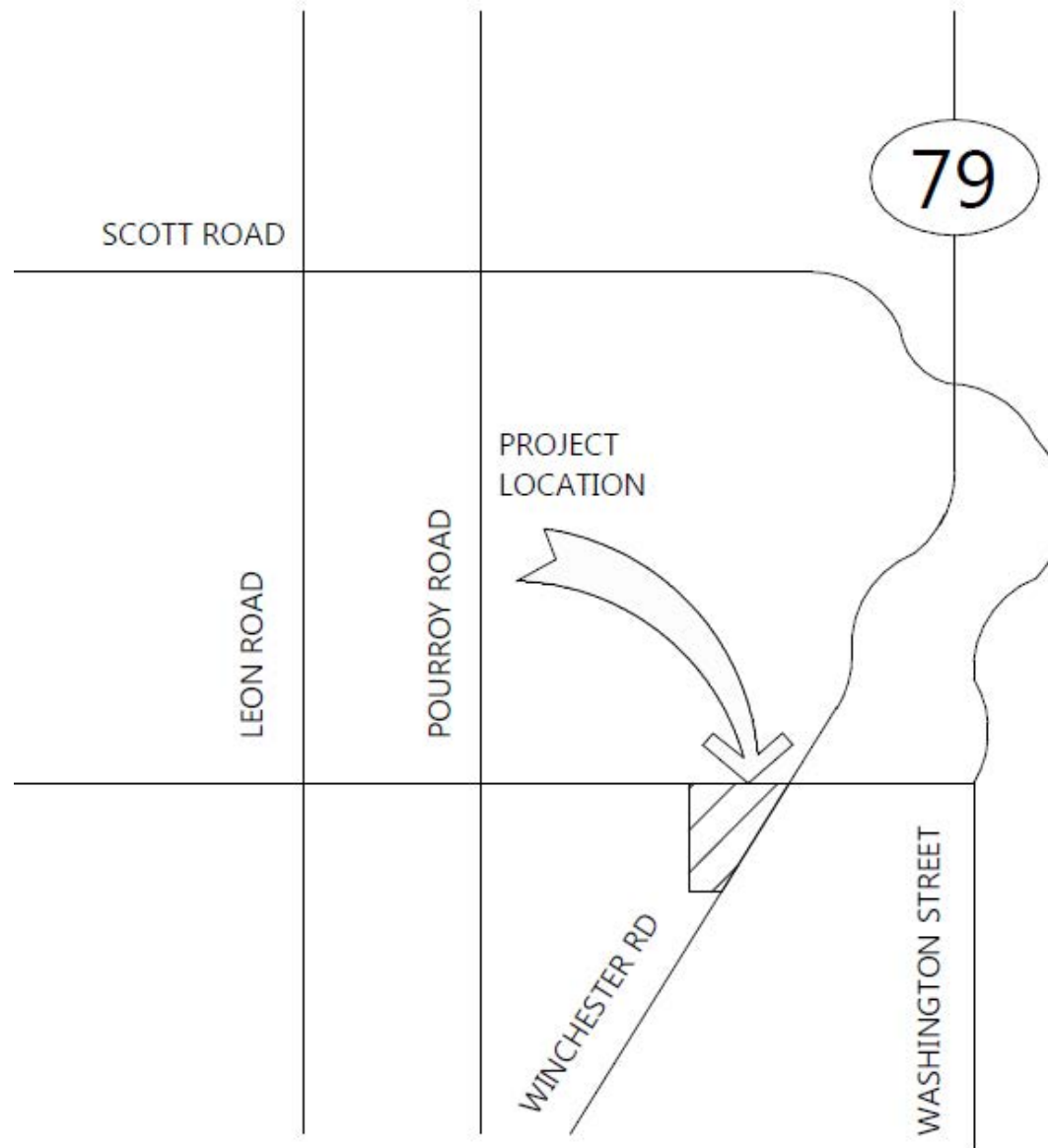
Per the County's Climate Action Plan (CAP), the Project will install photovoltaic solar energy systems on the building roofs consistent with Energy Measure R2-E6: Commercial/Industrial Renewable Energy Program, and Energy Measure R2-E10: On-site Renewable Energy Production Requirements for New Land Use Development Projects.

FIGURE 1
Regional Location Map



Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

FIGURE 2
Vicinity Map



Source: Project Plans (**Appendix I**)

FIGURE 3 Site Plan

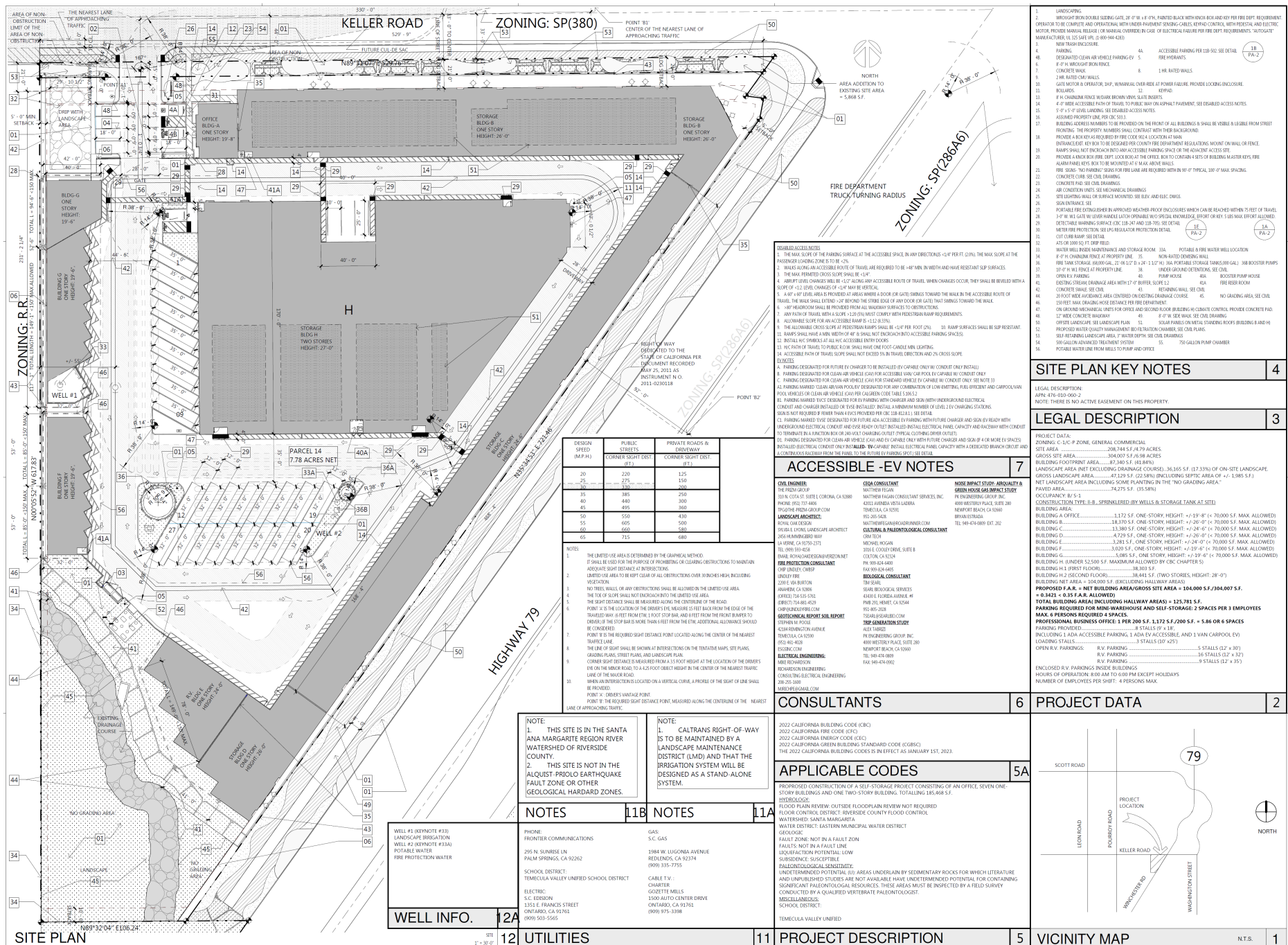


FIGURE 4
Renderings



Source: Project Plans (**Appendix I**)

FIGURE 5
Landscape Plan

CONCEPTUAL PLANT SCHEDULE		
	STREET FRONTAGE TREE	SIZE WUCOLS
	Lagunaria patersonii / Primrose Tree	24" Box, L
	Prunus edulis / Afghan Pine	24" Box, L
	Quercus ilex / Holly Oak	24" Box, L
	SCREEN TREE	
	Lagunaria patersonii / Primrose Tree	15-gal, L
	Podocarpus henkelii / Long-Leaved Yellow Wood	15-gal, M
	PARKING LOT SHADE TREE	
	Rhus lancea / African Sumac	24" Box, L
	ACCENT TREE	
	Acacia stenophylla / Shoestring Acacia	24" Box, L
	Lagerstroemia indica x fauriei / Tuscara / Tuscara Crape Myrtle	24" Box, M
	MEDIUM SCREEN SHRUB	
	5 ft. spacing	
	Baccharis x Stern / Stern Coyote Brush	5-gal, L
	Nerium oleander / Little Red / TM / Little Red Oleander	5-gal, L
	Westringia fruticosa / Wynyabie Gem / Wynyabie Gem Coast Rosemary	5-gal, L
	SMALL ACCENT SHRUB	
	2 to 3-ft. spacing	
	Angozanthos x Red / Kangaroo Paw	5-gal, L
	Bubline frutescens / Tiny Tangerine / Tiny Tangerine Bubline	5-gal, L
	Muhlenbergia dubia / Pine Mully	5-gal, L
	LARGE ACCENT SHRUB	
	4 to 6 ft. spacing	
	Daylily wheeleri / Grey Desert Spoon	5-gal, L
	Echinum fastuosum / Pride Of Madeira	5-gal, L
	Salvia leucantha / Santa Barbara / Mexican Bush Sage	5-gal, L
	SPREADING SHRUB	
	5-ft. minimum spacing	
	Arctostaphylos x John Dourley / John Dourley Manzanita	5-gal, L
	Cornus x Dusky Belle / Australian Fuchsia	5-gal, L
	Grevillea heilmanniana / Hummingbird Bush	5-gal, L
	Lantana x New Gold / New Gold Lantana	5-gal, L
	GROUND COVER (** denotes species to be used in sight distance zones)	SPACING
	12" to 36" spacing, depending on species and container size	
	Acacia redolens / Desert Carpet / TM / Bank Catclaw	1-gal, L 36" oc
	Alysicarpus / Red Apple / Red Apple Ice Plant	1-gal, L 12" oc
	Baccharis pilularis / Twin Peaks / Twin Peaks Coyote Brush	1-gal, L 36" oc
	Dalea greggii / Trailing Indigo Bush	1-gal, L 30" oc
	Lonicera japonica / Halls / Halls Honeyuckle Flowering Vine	Plants, L 12" oc
	RIVER ROCK MULCH	
	STABILIZED DECOMPOSED GRANITE	
	STREAM AREA GROUND COVER	
	12" to 24" spacing, depending on species and container size	
	Aristida purpurea / Purple Threasson	1-gal, L 18" oc
	Baccharis x Stern / TM / Stern Thompson Coyote Brush	1-gal, L 24" oc
	Carex pensia / Sanddune Sedge	4" pots, M 12" oc
	HYDROSEED	2,621 sf
	S&S Seeds Basic Native Erosion Control Mix	
	BIORETENTION BASIN	3,891 sf
	Baccharis pilularis / Pigeon Point / Pigeon Point Coyote Brush	1-gal, L 18" oc
	Carex pensia / Meadow Sedge	1-gal, M 12" oc
	Ilex hayesiana / San Diego Poverty Weed	1-gal, L 24" oc

TABULATIONS

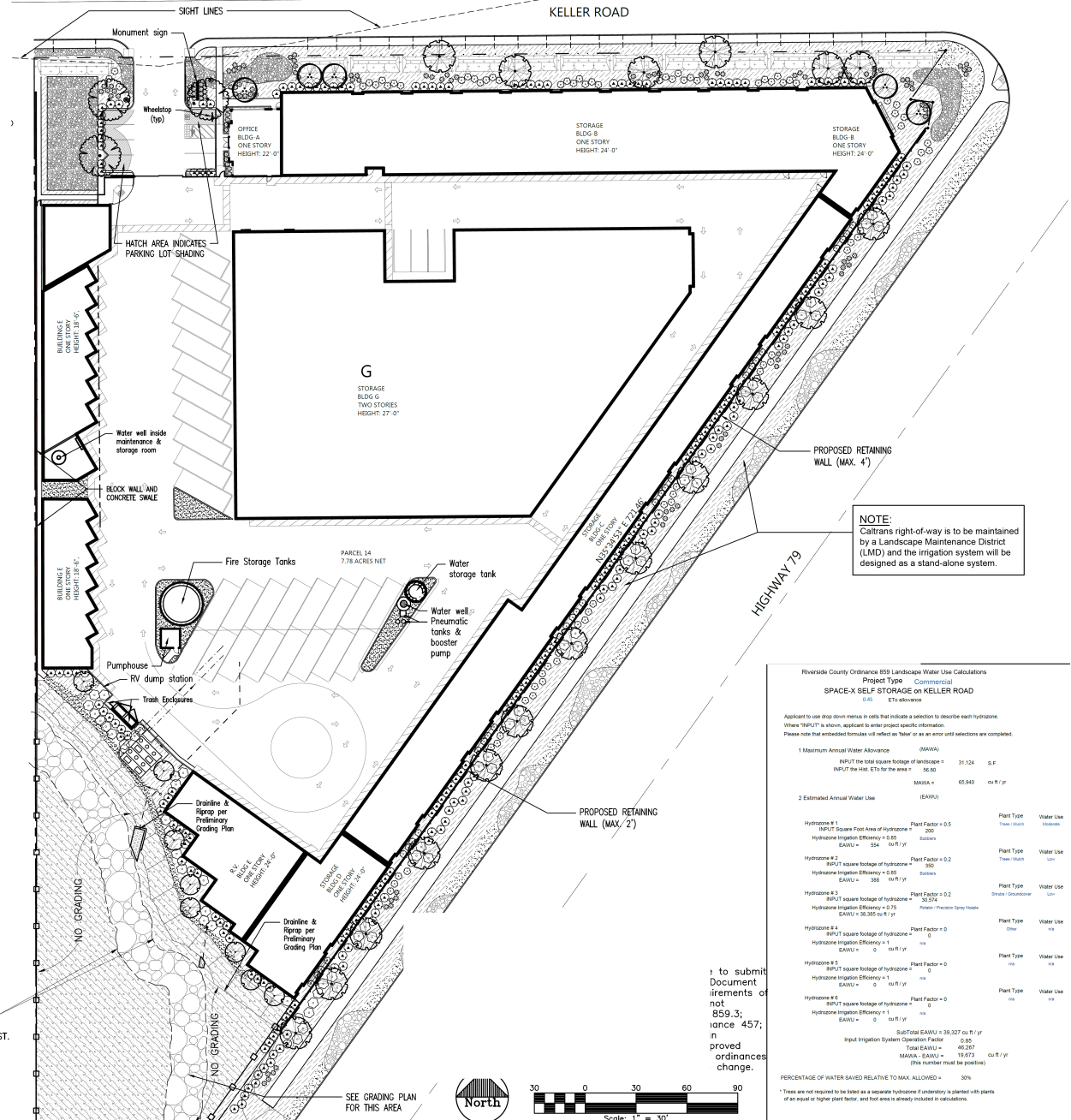
PARKING LOT SHADING:
Parking area = 1,121 s.f.
Shade area = 672 s.f. (60%)
(50% required)

ON-SITE LANDSCAPE AREA:
31,041 s.f. irrigated planted area shown
2,807 s.f. River Rock Mulch
1,900 s.f. DG Mulch
(5,407 s.f. total Rock/DG mulch (17.3%))
35,548 s.f. total on-site landscape area

ROW LANDSCAPE AREA:
18,353 s.f. irrigated planted area in ROW
3,007 s.f. River Rock Mulch
3,367 s.f. DG Mulch
(6,374 s.f. total Rock/DG mulch (34.8%))
24,676 s.f. total ROW landscape area

20-FT WIDE
AVOIDANCE AREA
CENTERED ON EXIST.
DRAINAGE COURSE.

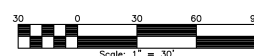
SEE GRADING PLAN
FOR THIS AREA



NOTE:
Caltrans right-of-way is to be maintained by a Landscape Maintenance District (LMD) and the irrigation system will be designed as a stand-alone system.

Riverside County Ordinance 859 Landscape Water Use Calculations			
Project Type		Commercial	
SPACE-X SELF STORAGE ON KELLER ROAD			
Etc. allowed			
Applicant to use drop down menus in cells that indicate a selection to describe each hydrant. (where "INPUT" is shown, applicant to enter project specific information)			
Please note that embedded formulas will reflect an "Error" or as an error until selections are completed.			
1 Maximum Annual Water Allowance (MAWA)		(MAWA)	
INPUT the total square footage of landscape =		31,124	S.F.
INPUT the HAE ETL for the area =		58.80	
		MAWA =	65,840 cu ft / yr
2 Estimated Annual Water Use (EAWU)		(EAWU)	
Hydrant # 1		Plant Factor = 0.5	Plant Type Water Use
INPUT Square Foot Area of Hydrant # 1		200	Trees / Shrubs Moderate
Hydrant Irrigation Efficiency = 0.95		Subarea	Water Use
EAWU = 554 cu ft / yr		EAWU = 554	cu ft / yr
Hydrant # 2		Plant Factor = 0.2	Plant Type Water Use
INPUT Square Footage of Hydrant # 2		200	Trees / Shrubs Low
Hydrant Irrigation Efficiency = 0.95		Subarea	Water Use
EAWU = 388 cu ft / yr		EAWU = 388	cu ft / yr
Hydrant # 3		Plant Factor = 0.2	Plant Type Water Use
INPUT Square Footage of Hydrant # 3		30,574	Ornamental Groundcover Low
Hydrant Irrigation Efficiency = 0.75		Subarea	Water Use
EAWU = 36,385 cu ft / yr		Subarea	Water Use
Hydrant # 4		Plant Factor = 0	Plant Type Water Use
INPUT Square Foot Area of Hydrant # 4		0	Grass Low
Hydrant Irrigation Efficiency = 1		Subarea	Water Use
EAWU = 0 cu ft / yr		EAWU = 0	cu ft / yr
Hydrant # 5		Plant Factor = 0	Plant Type Water Use
INPUT Square Footage of Hydrant # 5		0	Grass Low
Hydrant Irrigation Efficiency = 1		Subarea	Water Use
EAWU = 0 cu ft / yr		EAWU = 0	cu ft / yr
Hydrant # 6		Plant Factor = 0	Plant Type Water Use
INPUT Square Footage of Hydrant # 6		0	Grass Low
Hydrant Irrigation Efficiency = 1		Subarea	Water Use
EAWU = 0 cu ft / yr		EAWU = 0	cu ft / yr
SubTotal EAWU = 36,327 cu ft / yr		SubTotal EAWU = 36,327 cu ft / yr	
Input Irrigation System Operation Factor		0.95	
Total EAWU =		46,257	
MAWA - EAWU =		19,617	cu ft / yr
(this number must be positive)			
PERCENTAGE OF WATER SAVED RELATIVE TO MAX. ALLOWED =		30%	
* Trees are not required to be listed as a separate hydrant if understory is planted with plants of an equal or higher plant factor, and foot area is already included in calculations.			

to submit
Document
requirements of
not
859.3;
ance 457;
n
proved
ordinances
change.



Drainage / Hydrology / Water Quality

The Project site is located in the Santa Margarita Region Watershed which encompasses an area of approximately 750 square miles. It drains to Warm Springs Creek to the southwest to its confluence with Murrieta Creek, then to Murrieta Creek and the Santa Margarita River, eventually discharging into the Pacific Ocean. The site has not been graded and is relatively flat, with elevations ranging from approximately 1,413 feet to 1,428 feet above mean sea level (amsl) for a change of about 15 feet across the entire site. Onsite drainage currently flows to the south and southeast toward Highway 79.

The proposed Project is a privately owned public storage facility located at the southwest corner of Keller Road and Highway 79. Onsite stormwater runoff will be channeled toward and filtered through a "BioClean Modular Wetland System", then routed through underground detention chambers. Ultimately runoff will be released offsite into the existing drainage course on the west side of the site. The biofiltration system has a design capture volume of 3,280 sf and all flows will exit the detention facilities through a controlled outlet to control flows. Runoff is then piped to a headwall that outlets at the south end of the site. The site occupies 4.6 acres and over 80 percent of the site will be covered by impervious surfaces.

The proposed storm drain and water quality infrastructure system proposed for the Project meet the requirements and criteria established by the County of Riverside. This infrastructure will provide flood control protection for the Project site and proposed street improvements. Moreover, the storm drain and water quality system will provide the necessary Best Management Practices to treat the runoff generated by the Project in a manner that meets the requirements outlined in the Water Quality Management Plan Guidance Document

The onsite post-Project rational method hydrology calculations were analyzed using commercial land use. Unit hydrograph calculations were also performed for the onsite area for the 2-year, 24-hour and for the 10-year, 24-hour (for the area tributary to the north westerly corner of the Project site). These calculations were performed for the unit hydrograph for the pre-Project and post-Project conditions and were utilized in the hydrologic conditions of concern analyses and the increased runoff mitigation analyses. The onsite storm drain systems have been designed to convey the peak 100-year flow rate for the Project site.

Grading

The Project will require approximately 12,590 cubic yards (CY) of cut and 10,152 CY of fill (does not include detention structure excavation).

A. Type of Project: Site Specific ☒; Countywide ☐; Community ☐; Policy ☐.

B. Total Project Area:

Residential Acres: N/A	Lots: N/A	Units: N/A	Projected No. of Residents: N/A
Commercial Acres: 4.6	Lots: 1	Sq. Ft. of Bldg. Area: 125,781	Est. No. of Employees: 3
Industrial Acres: N/A	Lots:	Sq. Ft. of Bldg. Area: N/A	Est. No. of Employees: N/A
Other:			

C. Assessor's Parcel No(s): 476-010-060

D. Street References: The Project site is located south of Keller Road, east of Keller Flat Court, and west of Winchester Road. Reference **Figure 6, Aerial Photo**.

D. Section, Township & Range Description or reference/attach a Legal Description: Section 28, Township 6 South, Range 2 West.

E. Brief description of the existing environmental setting of the Project site and its surroundings:

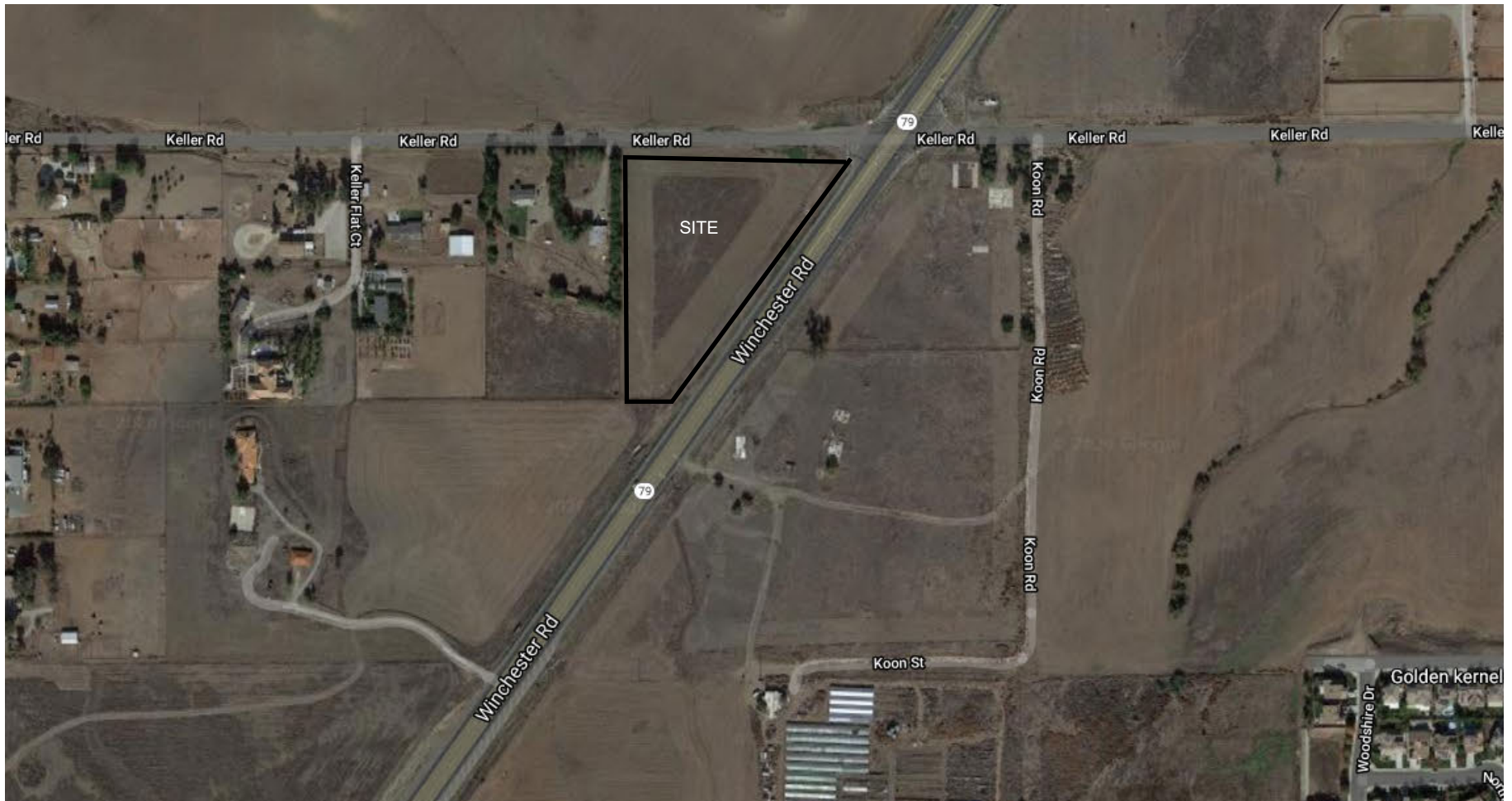
The subject property is located southwest of the intersection of Highway 79 and Keller Road in the Winchester Area of Riverside County, California. The subject property is comprised of approximately 4.6 acres of undeveloped land.

The Project area is situated within the French Valley, a northerly offshoot of the Temecula Valley, which is surrounded by the Santa Ana Mountains on the northwest, the San Jacinto Mountains on the northeast, and the Santa Rosa Plateau on the south. Small valleys interspersed with rolling hills, rugged mountain ridges, and boulder outcrops characterize the geographic setting of the region. The climate is typical of inland southern California, featuring hot and dry summers and mild and rainy winters. Annual precipitation averages approximately 11.4 inches.

The Project area is located in a rural area near the northern edge of recent suburban residential development expanding the nearby City of Temecula. It is bounded on the north by Keller Road, a dirt road, and on the east by Winchester Road, a major local thoroughfare, which was being widened at the time of the survey. A rural residence occupies the adjacent property to the west, while the rest of the adjoining land remains mostly vacant. The terrain in the Project area is relatively level, with a slight incline to the north, and the elevations range around 1,415-1,430 feet above mean sea level (AMSL).

Soils on the property consist of fine- to medium-grained sands with silt and small to medium-sized rocks. Most of the Project site is covered with dense vegetation, although the areas along the northern and western boundaries have recently been cleared. Most of the vegetation on the site consists of sparse to moderate amounts of annual weeds/grasses, along with small to large trees bordering the western portion of the subject site.

FIGURE 6
Aerial Photo



Source: Google Maps <https://www.google.com/maps>

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

1. Land Use:

The Project site's existing General Plan Land Use designation is Commercial Retail. The Project does not propose any change to the land use designation of the site. The Project would be consistent with the Land Use Element.

2. Circulation:

The proposed Project will add nominal overall trips to the area. The Department of Transportation has determined that no traffic study will be required for the Project. The proposed Project is consistent with all other applicable circulation policies of the General Plan.

3. Multipurpose Open Space:

The proposed Project is located within the Multiple Species Habitat Conservation Plan (MSHCP) and falls within criteria cell (5275). The Project underwent the HANS Process, and it was determined that the study area is not needed for inclusion into the MSHCP Conservation Area (HANS No. 02015). The proposed Project is consistent with all other applicable Multipurpose Open Space element policies.

4. Safety:

The Project site is located within Zone X, Area of Minimal Flood Hazard. The proposed Project is in an area designated as having low potential for liquefaction and Subsidence from scarification and recompaction of exposed bottom surfaces is expected to be negligible to approximately 0.01 foot. The Project is not located within an Alquist-Priolo or County Fault Zone. The Project is not located within a State Fire Responsibility Area (SRA) or a fire hazard zone. The proposed Project is consistent with all other applicable Safety element policies.

5. Noise:

The proposed Project will not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the General Plan and noise ordinance. The proposed Project is consistent with all other applicable Noise element policies.

6. Housing:

The proposed Project shall create no housing. This does not apply.

7. Air Quality:

The proposed Project has been conditioned to control any fugitive dust during grading and construction activities. The proposed Project meets all other applicable Air Quality Element policies.

8. Healthy Communities:

The Project meets all applicable policies of the Healthy Communities Element of the General Plan.

a) Environmental Justice:

The Project is not within an Environmental Justice community.

B. General Plan Area Plan(s): Southwest Area Plan

- **Foundation Component(s):** Existing: Community Development
- Proposed: Community Development

C. Land Use Designation(s): Commercial Retail

E. Overlay(s), if any: Not in a General Plan Overlay Area

F. Policy Area(s), if any: Highway 79 Policy Area

G. Adjacent and Surrounding:

1. **General Plan Area Plan(s):** Southwest Area Plan to the north, south, east, and west

2. **Foundation Component(s):** Community Development (CD) and Open Space (OS)

3. **Land Use Designation(s):**

- North: Very Low Density Residential (VLDR)
- South: Rural Residential (RR)
- East: Commercial Retail (CR)
- West: Rural Residential (RR)

Reference **Figure 7, General Plan Land Use Designations.**

4. **Overlay(s), if any:** Community Development Overlay to the northeast.

5. **Policy Area(s), if any:** Highway 79 Policy Area

H. Adopted Specific Plan Information

1. **Name and Number of Specific Plan, if any:** Not within a Specific Plan

2. **Specific Plan Planning Area, and Policies, if any:** None

I. Existing Zoning: General Commercial (C-1/C-P)

J. Proposed Zoning, if any: General Commercial (C-1/C-P)

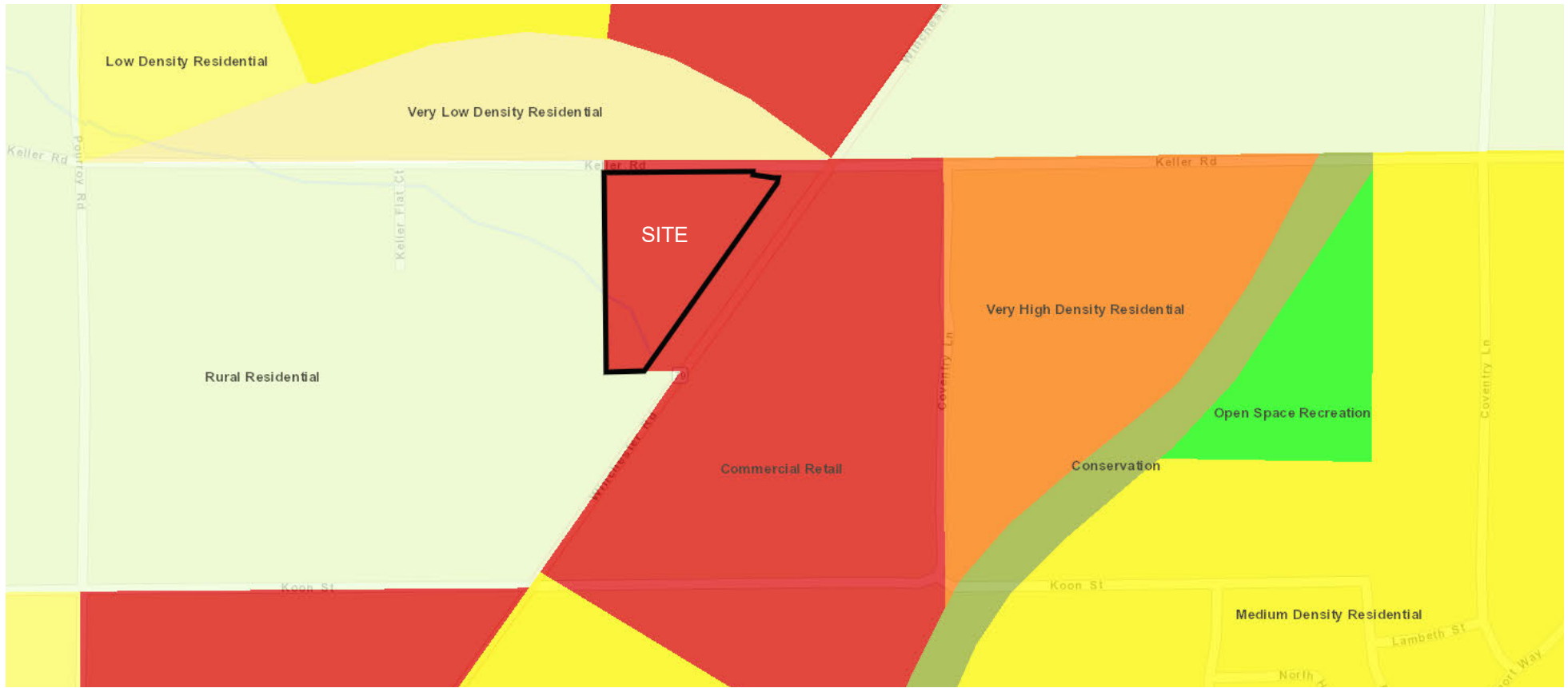
K. Adjacent and Surrounding Zoning:

- North: Specific Plan (SP)
- South: Rural Residential (RR)

- East: Specific Plan (SP)
- West: Rural Residential (RR)

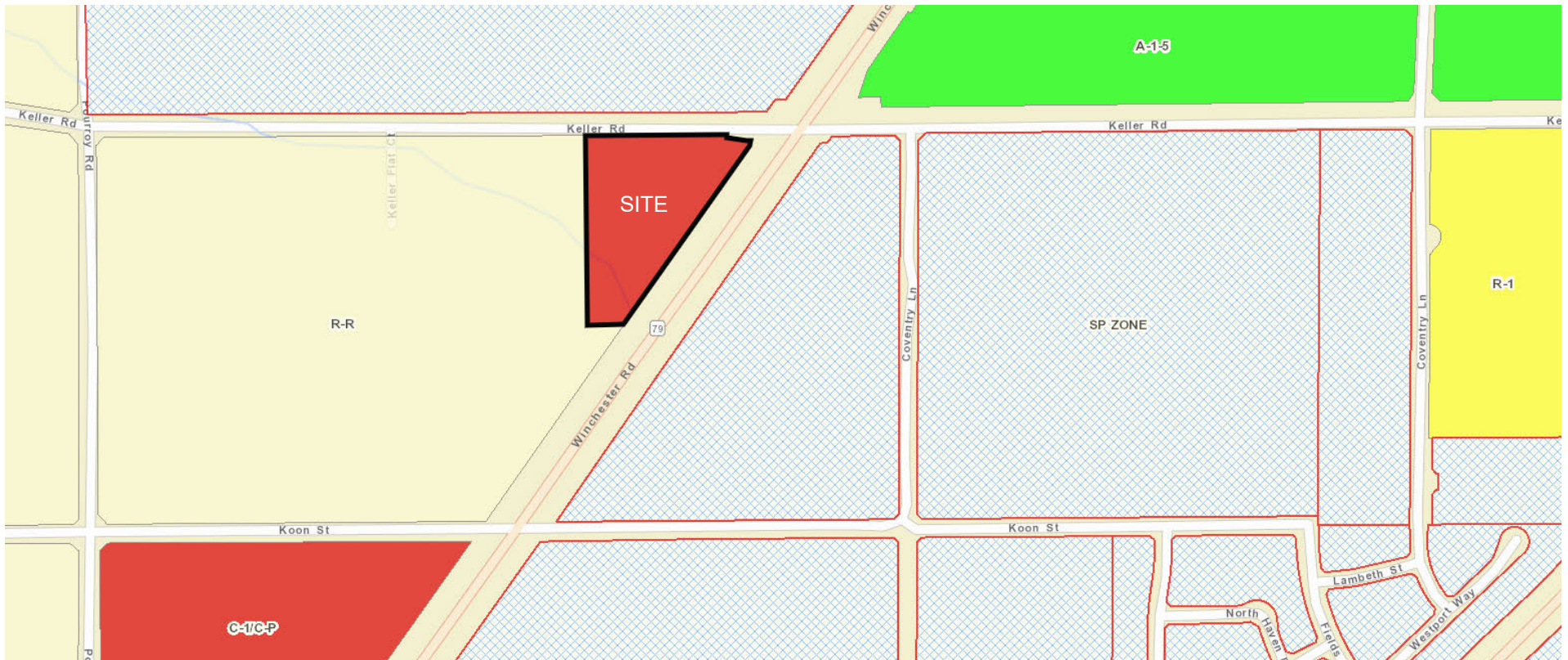
Reference **Figure 8, *Zoning Classifications***.

FIGURE 7
General Plan Land Use Designations



Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

FIGURE 8
Zoning Classifications



Source: Map My County https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public

	A-1-5	LIGHT AGRICULTURE - 5 ACRE PARCELS
	C-1/C-P	GENERAL COMMERCIAL
	R-R	RURAL RESIDENTIAL
	SP ZONE	SPECIFIC PLAN ZONE

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (x) would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

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

IV. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED
☐ 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, described in this document, have been made 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.

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED
☐ I find that although the proposed project could have a significant effect on the environment, NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.
☐ I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An ADDENDUM to a previously-certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.
☐ I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore a SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.
☐ I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and a SUBSEQUENT ENVIRONMENTAL IMPACT REPORT is required: (1)

Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following: (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration; (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration; (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or, (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.

Blanca Bernardino, Assistant Planner

Date

Printed Name

For: John E. Hildebrand
Planning Director

V. ENVIRONMENTAL ISSUES ASSESSMENT

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000-21178.1), this Initial Study has been prepared to analyze the proposed project to determine any potential significant impacts upon the environment that would result from construction and implementation of the project. In accordance with California Code of Regulations, Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the County of Riverside, in consultation with other jurisdictional agencies, to determine whether a Negative Declaration, Mitigated Negative Declaration, or an Environmental Impact Report is required for the proposed project. The purpose of this Initial Study is to inform the decision-makers, affected agencies, and the public of potential environmental impacts associated with the implementation of the proposed project.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS Would the Project:				
1. Scenic Resources				
a) Have a substantial effect upon a scenic highway corridor within which it is located?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

Source(s): Southwest Area Plan (SWAP) Figure 9, *Southwest Area Plan Scenic Highways*; Riverside County General Plan (*General Plan*); Site Photos (**Appendix J**); and Site Visit by Matthew Fagan July 21, 2020.

Findings of Fact:

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

No Impact

The Project site is located in the Southwest Area Plan (SWAP). According to Figure 9, *Southwest Area Plan Scenic Highways*:

- Interstate 215 (I-215) and State Route 79 South (SR-79S) are designated as County Eligible Scenic Highways;
- Interstate 15 (I-15) is designated as a State Eligible Scenic Highway; and
- Winchester Road is classified as "Not Designated."

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

The Project site is located approximately 4.5 miles from I-215, 7.5 miles from I-15, and 10 miles from SR-79 S at their closest points. While the Project site is adjacent to Winchester Road (SR-79 N), Winchester Road is “not designated” as a scenic highway or route. Therefore, implementation of the proposed Project would not have a substantial effect upon a scenic highway corridor within which it is located. No impacts would occur, and no mitigation would be required.

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

Less Than Significant Impact

Based on field reconnaissance of the Project site on July 21, 2020, by Matthew Fagan, five Site Photographs were taken from five different vantage points located adjacent to the Project site for evaluation in this analysis as discussed below:

Vantage Points

- Vantage Point 1 – Facing North towards Keller Road

Site Photograph #1 from Vantage Point 1 – Facing North towards Keller Road was taken from the Project site’s SR-79 N (Winchester Road) frontage.

This photograph depicts the Project site’s relatively flat topography as being generally at street grade with both SR-79 N and Keller Road, and there are no significant on-site landforms. The Project site’s SR-79 frontage was part of the SR-79 Widening Project which widened a 5.4 mile segment of the highway between Thompson Road and Domenigoni Parkway from two lanes to four lanes. Phase 1 (Scott Road to Domenigoni Pkwy) commenced construction in March 2012 and was completed in February 2014 at a cost of \$16 million; Phase 2 (Pourroy Rd to Scott Rd. adjacent to the Project site) construction commenced in February 2013 and was completed June 2014 for \$12 million.

The low-lying rolling hills at the right / right-central half of the photograph are a portion of the ±200-acre Keller Crossing Specific Plan #380, adopted November 2013. The more prominent hillside landform shown at the left side of the photograph is located just over one-half mile northwest of the Project site and directly west of Pourroy Road and Keller Crossing.

- Vantage Point 2 – Facing South from Keller Road

Site Photograph #2 from Vantage Point 2 – Facing South from Keller Road was taken from a mid-point along the Project site’s Keller Road (cut-graded dirt road) frontage. This photograph shows that the Project site’s perimeter has recently been tractor-disked and is mostly clear of any vegetation, with the exception of a natural drainage area at the southern portion of the site (not shown in photograph). The vegetation shown at the right side of the photograph is located along the perimeter of the improved rural residence (4.67-acre lot) situated adjacent west of the Project site. SR-79 can faintly be seen at the left/left center side of the photograph.

- Vantage Point 3 – Facing South from SR-79 and Keller Road

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Site Photograph #3 from Vantage Point 3 – Facing South from SR-79 and Keller Road was taken from the recently improved (2014) signalized intersection of SR-79 and Keller Road. This view south/southwest along the Project site’s SR-79 frontage shows the vacant, unimproved condition of the Project site and the “path of progress” location along the SR-79 corridor surrounded at present by a combination of vacant rural residential land and scattered rural residences. It is noted that the SR-79 ROW extends approximately 52-feet beyond the pavement shown in the photograph. It is also noted that there are no overhead electrical service lines (or subsurface lines) or street lighting facilities along the Project site’s street frontage. Lastly, no significant landforms are located on-site or adjacent to the Project site.

- Vantage Point 4 – Facing West from SR-79 N (Winchester Road)

Site Photograph #4 from Vantage Point 4 was taken from the SR-79 ROW looking west/northwest across the Project site’s south property line towards several rural residences adjacent west and southwest of the Project site as shown at the right half of the photograph. Similar to Site Photographs 1, 2 & 3, this photograph shows Project site’s relatively flat topography being generally at grade along SR-79 and absent any significant on-site landforms. The closest hillside shown at the left center portion of the photograph is approximately 0.38-mile due west of the Project site at the southwest quadrant of Keller Road and Pourroy Road and accessed via Flossie Way. The photograph shows the Project site is surrounded by a combination of vacant rural residential land and rural residences.

- Vantage Point 5 – Facing East from Keller Road

Site Photograph #5 from Vantage Point 5 was taken from the Project site’s Keller Road ROW near the Project site’s west property line shown at the far right of the photograph. As shown on the left side of the photograph, Keller Road is a cut-graded dirt road extending west from SR-79 along the Project site’s frontage and beyond. SR-79 can be faintly seen in the upper portion of the photograph. The Project site is shown to be generally flat, vacant unimproved land absent any significant landforms. The local hills in the background are situated roughly 1.5 miles or more east of SR-79 and the Project site. Lastly, as depicted, there are no overhead utility lines along Keller Road.

The Site Photographs show that there are no unique or landmark features located within the Project site boundaries. There are no landscape features that distinguish the Project site from the surrounding uses or vacant lands.

Implementation of the proposed Project would convert the Project site from its existing vacant, unimproved condition to a graded, improved parcel that would be developed with a self-storage and RV storage facility. The Project site’s grading plan would not significantly change the existing grade of the site; however, a modest lowering of Keller Road is proposed for access purposes along a portion of the Project site’s frontage where a very gentle rolling knoll is present (see Site Photograph #5). Building heights will not obscure or significantly impact any views of the surrounding local hillsides. Based on the lack of any significant onsite scenic resources, implementation of the proposed Project would not cause any significant impacts to scenic resources.

Therefore, implementation of the Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view. Any impacts would be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

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

Less Than Significant Impact

The Project site's setting is characterized as a semi-urbanized with vacant rural land slowly being converted to mostly single-family residential development followed by a limited amount of multi-family and supporting commercial uses. Suburban single-family residential tract development is currently located approximately one-third of a mile south and southeast of the Project site and a private Charter School is proposed for the vacant land immediately south of the Project site. The entire area has been experiencing urbanization in recent years so the visual criteria for an "urbanized area" is applicable to the proposed Project site.

As discussed in Threshold 1.a, the Project site is not located adjacent or proximate to a designated scenic highway and pursuant to the requested conditional use permit (CUP) is consistent with the SWAP General Plan Policies, and zoning. Therefore, implementation of the Project would not conflict with applicable zoning and other regulations governing scenic quality. Any impacts would be less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

2. Mt. Palomar Observatory

- a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?

☐
☐
☒
☐

Source(s): SWAP Figure 6, *Southwest Area Plan Mt. Palomar Nighttime Lighting Policy Area* (p.44); Google Maps; and Ordinance No. 655 (An Ordinance of the County of Riverside Regulating Light Pollution).

Findings of Fact:

- a) *Would the Project interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?*

Less Than Significant Impact

According to Figure 6, *Southwest Area Plan Mt. Palomar Nighttime Lighting Policy*, of the SWAP, the Project site is located within Zone B of the designated Special Lighting Area that surrounds the Mt. Palomar Observatory. The Project site is approximately 28 miles northwest from the Observatory.

Ordinance No. 655 was adopted by the County Board of Supervisors on June 7, 1988, and went into effect on July 7, 1988. The intent of Ordinance No. 655 is to restrict the permitted use of certain light fixtures emitting into the night sky undesirable light rays which have a detrimental effect on

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

astronomical observation and research. Ordinance No. 655 contains approved materials and methods of installation, definitions, general design requirements, requirements for lamp source and shielding, prohibitions and exceptions.

These are typically standard conditions of approval and are not considered unique mitigation pursuant to CEQA. Outdoors lighting sources include parking lot lights, wall mounted lights, and illuminated signage. With conformance to Ordinance No. 655, any impacts will be less than significant from implementation of the Project.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

3. Other Lighting Issues	☐	☐	☒	☐
b) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
c) Expose residential property to unacceptable light levels?	☐	☐	☒	☐

Source(s): SWAP Figure 6, *Southwest Area Plan Mt. Palomar Nighttime Lighting Policy Area* (p.44); Ordinance No. 655; Ordinance No. 915 (An Ordinance of the County of Riverside Regulating Outdoor Lighting); and **Figure 6, Aerial Photo**, in Section I. of this Initial Study.

Findings of Fact:

a) *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

Currently, there are no light sources at the Project site. New lighting sources will be created from light and glare associated with construction activities. These additional artificial light sources are typically associated with security lighting since all exterior construction activities are limited to daylight hours in the County. In addition, workers, either arriving to the site before dawn, or leaving the site after dusk, will generate additional construction light sources. The amount and intensity of light anticipated from these construction sources would generally be similar to the lighting of adjacent developed residential areas. Additionally, these impacts will be temporary, of short-duration, and will cease when Project construction is completed.

The Project will result in new sources of light and glare from the addition of parking lot or wall mounted lighting, as well as vehicular lighting from cars traveling on adjacent roadways under the proposed Project. Once operational, the Project will be required to comply with Ordinance No. 655 and Ordinance No. 915, which restricts lighting hours, types, and techniques of lighting. Outdoor lighting sources include streetlights and wall mounted lights. Ordinance No. 655 requires the use of low-pressure sodium fixtures and requires hooded fixtures to prevent spillover light or glare and has been discussed in detail in Threshold 2.a.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

Ordinance No. 915 requires all outdoor luminaires to be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, onto the public right-of-way. Ordinance No. 915 also prohibits blinking, flashing and rotating outdoor luminaires, with a few exceptions. The Project will be required to comply with the County of Riverside conditions of approval that requires lighting restrictions. These are typically standard conditions of approval and are not considered unique mitigation pursuant to CEQA. With conformance with Ordinance No. 655 and Ordinance No. 915, any impacts are expected to be less than significant from implementation of the Project. No mitigation will be required.

b) *Would the Project expose residential property to unacceptable light levels?*

Less Than Significant Impact

There is an existing residence located approximately 190 feet west of the Project site. However, as discussed in Threshold 2.a., construction impacts will be temporary, of short-duration, and will cease when Project construction is completed. Once operational, conformance with Ordinance No. 655 and Ordinance No. 915 will ensure that any impacts are expected to be less than significant from implementation of the Project.

Therefore, there are no potential Project-specific impacts that could expose residential property to unacceptable light levels. Impacts will be less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

AGRICULTURE & FOREST RESOURCES Would the Project:				
4. Agriculture	☐	☐	☐	☒
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?	☐	☐	☐	☒
c) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?	☐	☐	☐	☒
d) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Source(s): *Map My County (Appendix A); Figure 6, Aerial Photo*, in Section I. of this Initial Study; *General Plan, Multipurpose Open Space Element*, Figure OS-2, "Agricultural Resources"; and Ordinance No. 625 (An Ordinance of the County of Riverside Providing a Nuisance Defense for Certain Agricultural Activities, Operations, and Facilities and Providing Public Notification Thereof).

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Findings of Fact:

- 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?*

No Impact

The proposed Project site is designated by the State as “Farmland of Local Importance”. The Project is not located on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to non-agricultural use. The County of Riverside utilizes the FMMP for the “Farmland” portion in *Map My County*. The Project site is classified as “Farmland of Local Importance.”

Since the Project site does not have any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), there will be no impacts.

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

No Impact

According to *Map My County*, the proposed Project is not subject to a Williamson Act contract and is not within a Riverside County Agriculture Preserve. There will be no impacts.

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

No Impact

Land zoned for “primarily agricultural purposes” means any land lying within any one of the following zone classifications established by the Riverside County Land Use Ordinance, Ordinance No. 348:

- A-1 Zone (Light Agriculture)
- A-P Zone (Light Agriculture with Poultry)
- A-2 Zone (Heavy Agriculture)
- A-D Zone (Agriculture-Dairy)
- C/V Zone (Citrus/Vineyard)

The zoning classification on the Project site is General Commercial Retail (C-1/C-P).

The zoning classifications surrounding the Project site are:

- North: Specific Plan (SP) and A-1 Zone (Light Agriculture)
- South: Rural Residential (RR) and Specific Plan (SP)
- East: Specific Plan (SP)
- West: Rural Residential (RR)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

There is an agriculturally zoned property (A-1-5) within 300 feet (northeast) from the Project site. The Project will cause development of non-agricultural uses within 300 feet of agriculturally zoned property and is subject to the Right-to-Farm Ordinance (Ord. No. 625).

The Right-to-Farm Ordinance requires prospective buyers of property located within one mile of farmland designated on the most recent Important Farmland Map, to be notified through the title report that they could be subject to inconvenience or discomfort resulting from accepted farming activities. Ord. No. 625 requires disclosures as part of the sale of all homes proximate to agricultural uses, notifying future residents that they could be subject to inconvenience or discomfort resulting from accepted farming activities pursuant to the provisions of the County’s Right-to-Farm Ordinance.

The Project is also subject to the Right-to-Farm disclosure (AB 2881), effective January 1, 2009, which will protect adjacent Important Farmland from complaints by residential homeowners in the Project. Ordinance No. 625 requires land sellers and agents to disclose to buyers whether the property is located within 300’ of farmland so designated on the most recent Important Farmland Map. The disclosure will advise homeowners through the title report that they could be subject to inconvenience or discomfort resulting from accepted farming activities as per provisions of the County’s Right-to-Farm ordinance. This is a standard condition that would apply to any property located within 300’ of farmland so designated on the most recent Important Farmland Map. Therefore, it is not considered unique mitigation under CEQA.

While the Project will cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 “Right-to-Farm”), the General Plan and General Plan EIR anticipated this conflict. Any impacts will less than significant level with adherence to Ord. No. 625 and AB 2881.

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

No Impact

Please reference the discussions in Thresholds 4.a through 4.c. The Project will not involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland to non-agricultural use, since no agricultural uses are located in immediate proximity of the Project site. There will be no impacts.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5. Forest	☐	☐	☐	☒
a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?	☐	☐	☐	☒
b) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	☐	☐	☐	☒

Source(s): *Map My County (Appendix A); Figure 6, Aerial Photo*, in Section I. of this Initial Study; Project Site Visit – June 26, 2020, by Matthew Fagan; and *General Plan, Multipurpose Open Space Element*, Figure OS-3a, “Forestry Resources Western Riverside County” (p. OS-25).

Findings of Fact:

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

No Impact

Public Resources Code Section 12220(g) identifies forest land as *land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits*. The Project site and surrounding properties are not currently being defined, managed, or used as forest land as identified in Public Resources Code Section 12220(g). There will be no impacts.

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

No Impact

As referenced in Threshold 5.a, there is no forest land on the Project site. Therefore, there will be no loss of forest land or conversion of forest land to non-forest use as a result of the Project. There will be no impacts.

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

No Impact

Please see the responses to Thresholds 5.a and 5.b. There are no forest resources on-site, or in proximity of the Project site.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

Therefore, implementation of the Project will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use, since no forest uses are located in immediate proximity of the Project site. There will be no impacts.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

AIR QUALITY Would the Project:				
6. Air Quality Impacts				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors, which are located within one (1) mile of the Project site, to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Source(s): *Temecula Valley Self Storage Air Quality and Greenhouse Gas Impact Study*, prepared by RK Engineering Group, Inc., 1-15-2021 (AQ/GHG Study, **Appendix B**); and *Temecula Valley Self Storage Noise and Air Quality, and GHG Analysis Supplemental Letter*, prepared by RK Engineering Group, Inc., 10-9-2020 (**Appendix K**).

Note: Any tables or figures in this section are from the *AQ/GHG Study*, unless otherwise noted.

Findings of Fact:

- a) *Would the Project conflict with or obstruct implementation of the applicable air quality plan?*

Less Than Significant Impact

CEQA requires a discussion of any inconsistencies between a proposed Project and applicable General Plans and Regional Plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed Project includes the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies in the proposed Project with the AQMP.

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the proposed Project would interfere with the region's ability to comply with Federal and State air quality standards. If the decision-makers determine that the proposed Project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

The SCAQMD CEQA Handbook states that "New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant Projects must be analyzed for consistency with the AQMP". Strict consistency with all aspects of the AQMP is usually not required. A project should be considered consistent with the AQMP if it furthers one or more policies and does not obstruct other policies.

The SCAQMD CEQA Handbook identifies two key indicators of consistency:

1. Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
2. Whether the project will exceed the assumptions in the AQMP in 2016 or increments based on the year of project buildout and phase.

Criterion 1 - Increase in the Frequency or Severity of Violations

The results of the analysis of short-term construction emission levels and long-term operational emission levels show that the Project would not result in significant impacts based on the SCAQMD regional and local thresholds of significance. Therefore, the proposed Project would not contribute to the exceedance of an air pollutant concentration standard. The proposed Project is found to be consistent with the AQMP for the first criterion.

Criterion 2 - Exceed Assumptions in the AQMP

Consistency with the AQMP is determined by comparing the proposed Project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analysis conducted for the proposed Project is based on the same forecasts as the AQMP.

The 2016-2040 Regional Transportation/Sustainable Communities Strategy, prepared by the Southern California Association of Governments (SCAG) in 2016, includes chapters on the following issues: challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These chapters currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA.

The Project is consistent with the land use requirements in the Riverside County Zoning Ordinance for the C-1/C-P (General Commercial) zone. Project land uses are also consistent with the Southwest Area Plan. As a result, the Project is not expected to significantly increase emissions compared to what is currently allowed and projected in the AQMP for this region.

The Project is considered to be consistent with the AQMP and the impact is less than significant. As shown in the regional and localized emissions analysis, the Project is below the SCAQMD thresholds of significant for cumulative impacts.

- 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 with Mitigation Incorporated

The Project site is located in the South Coast Air Basin (SCAB). State and federal air quality standards are often exceeded in many parts of the SCAB.

Table 6-1, South Coast Air Basin Attainment Status, lists the attainment status for the criteria pollutants in the South Coast Air Basin (SCAB).

**Table 6-1
South Coast Air Basin Attainment Status¹**

Pollutant	State Status	National Status
Ozone	Nonattainment	Nonattainment (Extreme) ²
Carbon monoxide	Attainment	Attainment (Maintenance)
Nitrogen dioxide	Attainment	Attainment (Maintenance)
PM ₁₀	Nonattainment	Attainment (Maintenance)
PM _{2.5}	Nonattainment	Nonattainment
Lead	Attainment	Nonattainment (Partial) ³

¹ Taken from California Air Resources Board <http://www.arb.ca.gov/desig/adm/adm.htm>

² 8-Hour Ozone

³ Partial Nonattainment designation – Los Angeles County portion of Basin only

The SCAQMD has established air quality emissions thresholds for criteria air pollutants for the purposes of determining whether a project may have a significant effect on the environment per Section 15002(g) of the CEQA Guidelines. By complying with the thresholds of significance, the Project would be in compliance with the SCAQMD Air Quality Management Plan and the federal and state air quality standards. **Table 6-2, SCAQMD Regional Significance Thresholds**, lists the air quality significance thresholds for the six criteria air pollutants analyzed in this section. Lead is not included as part of this analysis as the Project is not expected to emit lead in any significant measurable quantity.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Table 6-2
SCAQMD Regional Significance Thresholds

Pollutant	Construction (lbs./day)	Operation (lbs./day)
NO_x	100	55
VOC	75	55
PM₁₀	150	150
PM_{2.5}	55	55
SO_x	150	150
CO	550	550

Regional daily emissions of criteria pollutants are compared to the SCAQMD regional thresholds to determine if Project-related emissions represent significant air quality impacts. A discussion of the Project's potential short-term construction impacts, and long-term operational impacts is provided below.

Regional Emissions - Construction

Regional air quality emissions include both on-site and off-site emissions associated with construction of the Project. Regional air quality emissions include both on-site and off-site emissions associated with construction of the Project. Regional daily emissions of criteria pollutants are compared to the SCAQMD regional thresholds of significance. As shown in **Table 6-3, Regional Construction Emissions**, regional daily emissions of criteria pollutants are expected to be below the allowable thresholds of significance.

Table 6-3
Regional Construction Emissions

Maximum Daily Emissions (lbs./day) ¹						
Activity	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Site Preparation	5.28	96.52	30.22	0.23	13.90	7.14
Grading	2.36	24.78	16.41	0.03	3.83	2.40
Building Construction	2.26	19.92	19.35	0.04	1.84	1.15
Paving	1.24	10.90	13.00	0.02	0.80	0.59
Architectural Coating	71.16	1.44	2.26	0.00	0.23	0.12
Maximum ¹	71.16	96.52	30.22	0.23	13.90	7.14
SCAQMD Threshold	75	100	550	150	150	55
Exceeds Threshold (?)	No	No	No	No	No	No

¹ Maximum Daily emissions during summer or winter; includes both on-site and off-site Project emissions.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

The Project must follow all standard SCAQMD rules and requirements with regards to fugitive dust control. Due to the nearest sensitive receptor being located approximately 25 meters from the western property line, compliance with the standard dust control measures is included in the recommended mitigation and taken into account in the project emissions analysis.

Although **Table 6-3** shows the Project’s daily construction emissions will be below the applicable SCAQMD regional air quality standards and thresholds of significance, the *AQ/GHG Study* provided **Mitigation Measures MM-AQ-1** through **MM-AQ-11** to help assure construction-related emissions would remain at less than significant¹ levels.

By complying with the SCAQMD standards, the Project would not also contribute to 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Therefore, with the required mitigation the Project’s short-term construction-related impacts on regional air resources are reduced to less than significant levels.

Regional Emissions - Operation

Operational emissions occur over the life of the Project and are considered “long-term” sources of emissions. Operational emissions include both direct and indirect sources (mobile source emissions, energy source emissions, areas source emissions and other source emissions). It should be noted the Project will comply with the mandatory requirements of Title 24 part 11 of the California Building Standards Code (CALGreen)² and the Title 24 Part 6 Building Efficiency Standards. This is considered regulatory compliance and not unique mitigation under CEQA.

Long-term operational air pollutant impacts from the Project are shown in **Table 6-4, Regional Operational Emissions**.

¹ Note that Table 6-3 shows Project VOC and NOx emissions are within 5 percent of the threshold so the Mitigation Measures will help assure emissions do not exceed anticipated levels
² The AQ/GHG Study identified CALGreen compliance as Project Design Feature DF-1 but it is considered standard regulatory compliance, so it is not identified separately in the Initial Study

**Table 6-4
Regional Operational Emissions**

Maximum Daily Emissions (lbs./day) ¹						
Activity	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile Sources	0.54	4.02	7.29	0.03	2.47	0.67
Energy Sources	0.01	0.07	0.06	0.00	0.01	0.01
Area Sources	3.07	0.00	0.02	0.00	0.00	0.00
Total¹	3.63	4.10	7.37	0.03	2.47	0.68
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold (?)	No	No	No	No	No	No

¹ Maximum daily emissions during summer or winter

The maximum daily emissions analyzed in **Table 6-4** include both on-site and off-site Project emissions. The Project's daily operational emissions will be well below the applicable SCAQMD regional air quality standards and thresholds of significance, and the Project's operational emissions would not contribute substantially to an existing or projected air quality violation.

With incorporation of the required **Mitigation Measures MM-AQ-1** through **MM-AQ-11** and compliance with the State Green Building Code, implementation of the Project will not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard during either construction or operation or on a cumulative basis. Any impacts will be reduced to less than significant levels with mitigation incorporated.

c) Would the Project expose sensitive receptors, which are located within one (1) mile of the Project site, to substantial pollutant concentrations?

Less Than Significant Impact with Mitigation Incorporated

Localized Significance Thresholds-Construction

CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily disturbance activity possible for each piece of equipment. The *AQ/GHG Study* identifies the following parameters in order to compare CalEEMod reported emissions against the localized significance threshold lookup tables:

- The off-road equipment list (including type of equipment, horsepower, and hours of operation) assumed for the day of construction activity with maximum emissions.
- The maximum number of acres disturbed on the peak day.
- Any emission control devices added onto off-road equipment.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

- Specific dust suppression techniques used on the day of construction activity with maximum emissions.

Air quality emissions were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold (LST) Look-up Tables. **Table 6-5, SCAQMD Localized Significance Thresholds (LST)**, lists the Localized Significance Thresholds (LST) used to determine whether a project may generate significant adverse localized air quality impacts. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard. LSTs are developed based on the ambient concentrations of four applicable air pollutants for source receptor area (SRA) 26 – Temecula Valley.

The nearest existing sensitive receptors are located along the northern and eastern property lines of the site, less than 25 meters from potential areas of on-site construction and operational activity. Although receptors are located closer than 25 meters to the site, SCAQMD LST methodology states that projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.

The daily disturbance area is calculated to be 3.5 acres; however, LST thresholds are only based on 1, 2 and 5-acre sites. In order to be conservative, a linear progression model was used to estimate the threshold for 3.5-acre site based on the established LST thresholds.

Table 6-5
SCAQMD Localized Significance Thresholds¹ (LST)

Pollutant	Construction (lbs./day)	Operational (lbs./day)
NO _x	297.9	297.9
CO	1,521.8	1,521.8
PM ₁₀	9.8	2.9
PM _{2.5}	6.1	1.6

¹ Based on the SCAQMD Mass Rate Localized Significance Thresholds for 4-acre site in SRA-26 at 25 meters

Table 6-6, Localized Construction Emissions - Unmitigated, illustrates the construction-related localized emissions and compares the results to SCAQMD LST thresholds.

Table 6-6
Localized Construction Emissions - Unmitigated

Maximum Daily Emissions (lbs./day) ¹				
Activity	NO _x	CO	PM ₁₀	PM _{2.5}
On-site Emissions	40.50	21.15	9.05	5.69
SCAQMD Construction Threshold ²	297.9	1,521.8	9.8	6.1
Exceeds Threshold (?)	No	No	No	No

¹ Maximum daily emissions during summer or winter; includes on-site Project emissions only

² Reference 2006-2008 SCAQMD Mass Rate Localized Significant Thresholds for construction and operation, SRA-26, Temecula Valley, 4-acre site, receptor distance 25 meters

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

As shown in **Table 6-6**, the emissions will be below the SCAQMD thresholds of significance for localized construction emissions. Similar to regional air quality impacts, Construction LST impacts will be less than significant with the incorporation of **Mitigation Measures MM-AQ-1** through **MM-AQ-11** provided in the *AQ/GHG Study*.

Diesel Particulate Matter – Construction

The greatest potential for toxic air contaminant emissions from the Project would be related to diesel particulate matter (DPM) emissions associated with heavy diesel equipment used during construction. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of “individual cancer risk”. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of toxic air contaminants over a 30-year lifetime will contract cancer, based on the use of standard risk-assessment methodology.

As shown in **Table 6-3, Regional Construction Emissions**, and in **Table 6-6, Localized Construction Emissions - Unmitigated**, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed regional or local thresholds. Given the short-term construction schedule, the proposed Project’s construction activity is not expected to be a long-term (i.e., 30 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk.

In September 2000, the CARB adopted the Diesel Risk Reduction Plan, which recommends control measures to reduce the risks associated with DPM. The key elements of the Plan are to clean up existing engines through engine retrofit emission control devices, adopt stringent standards for new diesel engines, lower the sulfur content of diesel fuel, and implement advanced technology emission control devices on diesel engines.

The Project is located adjacent to a residence; therefore, in order to ensure the level of DPM exposure is reduced as much as possible, the Project shall implement **Mitigation Measures MM-AQ-1** through **MM-AQ-11** provided in the *AQ/GHG Study* to reduce diesel particulate emissions and potential health risks to adjacent residents.

Asbestos - Construction

Based on the California Division of Mines and Geology General Location Guide for Ultramafic Rocks in California - Areas More Likely to Contain Naturally Occurring Asbestos, naturally occurring asbestos, found in serpentine and ultramafic rock, has not been shown to occur within the vicinity of the Project site. Therefore, the potential risk for naturally occurring asbestos (NOA) during Project construction is small. However, in the event NOA is found on the site, the Project will be required to comply with the National Emission Standard for Hazardous Air Pollutants (NESHAP) standards. An Asbestos NESHAP Notification Form shall be completed and submitted to the CARB immediately upon discovery of the contaminant. The Project will be required to follow NESHAP standards for emissions control during site renovation, waste transport and waste disposal. A person certified in asbestos removal procedures will be required to supervise on-site activities.

By following the required asbestos abatement protocols, the Project impact is less than significant.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Construction Traffic

Construction traffic is evaluated with regards to air quality and greenhouse gas related emissions. Construction traffic is expected to be heaviest during the grading phase of the Project. As shown in **Table 6-3** shows that, with compliance with **Mitigation Measures MM-AQ-1** through **MM-AQ-11**, emission levels associated with on-site and off-site construction traffic will be below the applicable thresholds set forth by the SCAQMD.

Localized Significance Thresholds-Operation

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, on-site usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the state and federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. The nearest sensitive land uses are considered the residential uses located approximately 25 meters to the west of the property line. **Table 6-7, Localized Operational Emissions**, shows the localized operational emissions and compares the results to SCAQMD LST thresholds of significance.

Table 6-7
Localized Operational Emissions

Maximum Daily Emissions (lbs./day) ¹				
LST Pollutants	NOx (lbs./day)	CO (lbs./day)	PM ₁₀ (lbs./day)	PM _{2.5} (lbs./day)
On-site Emissions (mobile source) ²	0.28	0.44	0.13	0.04
SCAQMD Operation Threshold ³	297.9	1,521.8	2.9	1.6
Exceeds Threshold (?)	No	No	No	No

¹ Maximum daily emissions during summer or winter

² Mobile source emissions include on-site vehicle emissions only (such as vehicle idling and circulating in the parking lot). It is estimated that approximately 5% of mobile emissions will occur on the Project site.

³ Reference: 2006-2008 SCAQMD Mass Rate Localized Significant Thresholds for construction and operation Table C-1 through C-6; SRA 26, Temecula valley disturbance area of 4-acre and receptor distance of 25 meters

As shown in **Table 6-7**, emissions will be below the SCAQMD thresholds of significance for localized operational emissions. The Project will result in less than significant localized operational emissions impacts.

Toxic Air Contaminants – Operations

The Project would consist of commercial, mini self-storage. This type of project does not include major sources of toxic air contaminants (TAC) emissions that would result in significant exposure of sensitive receptors to substantial pollutant concentrations. Therefore, the Project impact is considered less than significant.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Carbon Monoxide (CO) Hot Spots

A CO hot spot is a localized concentration of carbon monoxide (CO) that is above the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. At the time of the publishing of the 1993 CEQA Air Quality Handbook, the SCAB was designated nonattainment, and projects were required to perform hot spot analyses to ensure they did not exacerbate an existing problem. Since this time, the SCAB has achieved attainment status and the potential for hot spots caused by vehicular traffic congestion has been greatly reduced. In fact, the SCAQMD AQMP found that peak CO concentrations were primarily the result of unusual meteorological and topographical conditions, not traffic congestion. Additionally, the 2003 SCAQMD AQMP found that, at four of the busiest intersections in SCAB, there were no CO hot spots concentrations.

Furthermore, per the *AQ/GHG Study*, the Traffic Study prepared for the Project found that all significant Project traffic impacts would be mitigated to less than significant levels. Therefore, it is reasonable to conclude that the Project would not significantly increase traffic congestion in the vicinity of the site that would lead to the formation of CO hot spots. The Project impact relative to CO hot spots will be less than significant.

Summary

The preceding analyses demonstrate the Project will not expose any sensitive receptors, which are located within one (1) mile of the Project site, to substantial pollutant concentrations either during construction or operation. Impacts will be less than significant with implementation of the required **Mitigation Measures MM-AQ-1 through MM-AQ-11**.

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

Land uses that commonly receive odor complaints include agricultural uses (farming and livestock), chemical plants, composting operations, dairies, fiberglass molding facilities, food processing plants, landfills, refineries, rail yards, and wastewater treatment plants. The proposed self-storage project does not contain land uses that would typically be associated with significant odor emissions.

The Project will be required to comply with standard building code requirements related to exhaust ventilation, as well as comply with SCAQMD Rule 402. Rule 402 requires that a person may 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. Project related odors are not expected to meet the criteria of being a nuisance. The Project’s operation would result in less than significant odor impacts.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

Mitigation:

- MM-AQ-1** The Project must follow SCAQMD rules and requirements with regards to fugitive dust control, which include but are not limited to the following:
- All active construction areas shall be watered two (2) times daily.
 - Speed on unpaved roads shall be reduced to less than 15 mph.
 - Any visible dirt deposition on any public roadway shall be swept or washed at the site access points within 30 minutes.
 - Any on-site stockpiles of debris, dirt or other dusty material shall be covered or watered twice daily.
 - All operations on any unpaved surface shall be suspended if winds exceed 15 mph.
 - Access points shall be washed or swept daily.
 - Construction sites shall be sandbagged for erosion control.
 - Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
 - Cover all trucks hauling dirt, sand, soil, or other loose materials, and maintain at least 2 feet of freeboard space in accordance with the requirements of California Vehicle Code (CVC) section 23114.
 - Pave or gravel construction access roads at least 100 feet onto the site from the main road and use gravel aprons at truck exits.
 - Replace the ground cover of disturbed areas as quickly possible.
 - A fugitive dust control plan should be prepared and submitted to SCAQMD prior to the start of construction.
 - Pave or gravel construction access roads at least 100 feet onto the site from the main road and use gravel aprons at truck exits.
 - Replace the ground cover of disturbed areas as quickly possible.
 - A fugitive dust control plan should be prepared and submitted to SCAQMD prior to the start of construction.
- MM-AQ-2** Prepare and implement a Construction Management Plan which will include Best Available Control Measures to be submitted to the County of Riverside.
- MM-AQ-3** Construction equipment shall be maintained in proper tune.
- MM-AQ-4** All construction vehicles shall be prohibited from excessive idling. Excessive idling is defined as five (5) minutes or longer.
- MM-AQ-5** Minimize the simultaneous operation of multiple construction equipment units.
- MM-AQ-6** The use of heavy construction equipment and earthmoving activity shall be suspended during Air Alerts when the Air Quality Index reaches the "Unhealthy" level.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MM-AQ-7	Utilize low emission "clean diesel" equipment with new or modified engines that include diesel oxidation catalysts, diesel particulate filters or Moyer Program retrofits that meet the California Air Resources Board (CARB) best available control technology.				
MM-AQ-8	Establish an electricity supply to the construction site and use electric powered equipment instead of diesel-powered equipment or generators, where feasible.				
MM-AQ-9	Establish staging areas for the construction equipment that are as distant as possible from adjacent sensitive receptors (residential land uses).				
MM-AQ-10	Use haul trucks with on-road engines instead of off-road engines for on-site hauling.				
MM-AQ-11	Utilize zero volatile organic compounds (VOC) and low VOC paints and solvents, wherever possible.				

Monitoring:

Measures will be monitored before and during grading and construction as indicated in the Mitigation Monitoring and Reporting Plan.

BIOLOGICAL RESOURCES Would the Project:					
7. Wildlife & Vegetation		☐	☒	☐	☐
a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?		☐	☒	☐	☐
b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?		☐	☒	☐	☐
c) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?		☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		☐	☒	☐	☐
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?		☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

Source(s): *Burrowing Owl with a Discussion of Planning Species and Biological Issues*, prepared by Joan R. Callahan, Ph.D., 6-23-2010 (*Bio Report, Appendix C1*); *HANS 2015, JPR 10-07-26-01*, prepared by Regional Conservation Authority, 8-09-2010 (*JPR/HANS, Appendix C2*); Ordinance No. 810.2 (An Ordinance of the County of Riverside Amending Ordinance No. 810 to Establish the Western Riverside County Multiple Species Habitat Conservation Plan Mitigation Fee); County Ordinance No. 559 (Regulating the Removal of Trees); Site Visit by Matthew Fagan on July 21, 2020; Google Earth; and Ordinance No. 633 (An Ordinance of the County of Riverside Amending Ordinance No. 663 Establishing The Riverside County Stephens' Kangaroo Rat Habitat Conservation Plan Fee Assessment Area and Setting Mitigation Fees).

Findings of Fact:

- a) *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?*

Less Than Significant with Mitigation Incorporated

The Project site is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and the following analysis demonstrates how the Project is consistent with the goals, objectives, and requirements of the MSHCP. The analysis will address the following sections of the MSHCP regarding specific resources:

- *MSHCP Criteria Cells, Core Areas, and Constrained Linkages.*
- *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools* (Section 6.1.2).
- *Protection of Narrow Endemic Plant Species* (NEPS) Assessment Area No. 5 (Section 6.1.3).
- *Additional Survey Needs and Procedures for Criteria Area Plant Species* (CAPS) Assessment Area No. 5 (Section 6.3.2).
- *Burrowing Owl* (*Athene cunicularia*) (BUOW) (Section 6.3.2).
- *Guidelines Pertaining to the Urban/Wildlands Interface* (Section 6.1.4).

A biological assessment of the property was conducted for a previous development proposal in 2010 which included archival research, field surveys, and a search of governmental databases. At that time, a Habitat Evaluation and Acquisition Negotiation Strategy (HANS) report was prepared, and the previous public storage project participated in and was approved through the Joint Project Review (JPR) process. The County's Environmental Programs

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Department (EPD) has determined³ that as long as the drainage channel is not disturbed and a 10-foot avoidance buffer on each side of the drainage is maintained, no additional studies or approvals are needed for this Project although a pre-construction burrowing owl survey will be included as a standard condition of approval.

As observed during the site visit by Matthew Fagan on July 21, 2020, as well as via review of recent (2025) Google Earth images, the Project site has essentially the same physical conditions as when the *Bio Report* and *JPR/HANS* were approved due to it being regularly disced for weed abatement. Additionally, the riparian area and required 10-foot buffer along both sides of the drainage will not be disturbed as a result of the Project. There are several mature trees immediately adjacent to the site to the west on the neighboring parcel. These trees may provide roosting or nesting opportunities for various bird species including raptors. Due to the level of human disturbance on the site, it does not support native wildlife other than common species of reptiles, mammals, and birds that are tolerant of human activity.

MSHCP Criteria Cells, Core Areas, Constrained Linkages, and Reserve Assembly

The approved *JPR/HANS* report states the following relative to the Project site:

- a. Proposed Constrained Linkage 18 consists of an unnamed drainage located in the south-Central region of the Plan Area. This Constrained Linkage connects Proposed Core 2 (Antelope Valley) to the west with Proposed Extension of Existing Core 7 (Lake Skinner/Diamond Valley Lake Extension). Existing agricultural use constrains the Linkage, and planned land uses surrounding the Linkage are limited nearly entirely to community Development. The Linkage also has a relatively high proportion of land affected by edge (approximately 250 acres of the tota1 310 acres) and will also be subject to Edge Effects also due to the widening or extension of several facilities including Washington Street, Briggs Road, and SR-79. Despite these issues, the Linkage nonetheless provides Live-In and movement Habitat for species. This Linkage likely provides for movement of common mammals such as bobcat. An adequate wildlife underpass or overpass may need to be implemented to insure [sic] movement of species in this area and to reduce the chance of mortality from vehicle collision.*

- b. The project site is primarily located in Cell 5275. Conservation within Cell 5275 will contribute to the assembly of Proposed Constrained Linkage 18. Conservation within Cell 5275 will focus on riparian scrub, woodland, and forest habitat and adjacent agricultural land. Areas conserved within this Cell will be connected to riparian scrub, woodland and forest habitat and agricultural land proposed for conservation in Cell 5376 to the south and to agricultural land proposed for conservation in Cell 5279 to the east. Conservation within Cell 5275 will range from 10% to 20% of the Cell focusing in [sic] the southern portion of the Cell.*

- c. The 5.3-acre parcel is a recently disked vacant lot. The project site is relatively flat with no trees or rock formations present with elevations of 1416 to 1432 feet above mean sea level. An intermittent blue stream crosses the southern end of the parcel. Soils mapped in the site vicinity include Escondido fine sandy loam, Friant fine sandy loam, Garretson very*

³ Please see email from EPD provided in the Sources List at the end of this Initial Study.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

fine sandy loam, Monserate sandy loam, and Vallecitos loam. Permeability for these five soils ranges from very slow to moderately rapid. Vegetation consists of a natural sage brush type. Adjacent land uses include rural residential development and horse property to the west, Keller Road to the north, Highway 79 to the east, and vacant land to the south. The owner proposes to build a public storage facility and medical office building that will occupy the entire site. Given that the project site is located in the northeast portion of Cell 5275, which is not the area contemplated for Conservation, the project would not conflict with Reserve Assembly.

Based on the above information, there are no impacts in this regard and no mitigation is required.

Riparian/Riverine/Vernal Pool Resources

The JPR/HANS states..."There is a riverine area on the project site, but no reported riparian habitat. There are no vernal pools on the project site and soils are not suitable for fairy shrimp habitat....The Habitat Assessment Report prepared by Joan R. Callahan, PhD. dated June 23, 2010 and the Permittee both indicated a small ditch mapped as an intermittent blueline stream crossing the southern portion of the site and flowing offsite to the southeast via a culvert under Winchester Road (Highway 79). No riparian habitat was observed to be associated with this drainage; therefore, no focused surveys were warranted for riparian bird species. The Permittee will ensure that flows through this drainage are maintained during the entitlement process, so that water flowing from this site is not interrupted. Soils onsite are generally too well drained to promote fairy shrimp habitat. The report also determined that one of the soils mapped in the site vicinity, Monserate sandy loam, has very slow permeability due to a hardpan layer at a depth of about 10 to 36 inches. Soil with this type of subsurface layer is one of the prerequisites for the formation of vernal pools. However, the report stated since repeated deep disking has disturbed the soil profile and no basin is apparent, it is unlikely that vernal pools have been present in recent years. Based on the lack of riparian resources on site, and given that the water flowing from the site in the drainage feature will be maintained after project development, the Project demonstrates compliance with Section 6.1.2 of the MSHCP."

The Project site does not contain any drainage channels or features that fall under the jurisdiction of federal or state resource agencies. Per the JPR/HANS, no hydric, clay, or saline-alkali soils were identified on the site which could support vernal pools. However, there is an ephemeral drainage in the southern portion of the site. During the JPR/HANS process, the County's Environmental Programs Department requested a Determination of Biologically Equivalent or Superior Preservation (DBESP) report as part of the conditions of approval if the drainage was going to be impacted. In the previous project, the drainage was going to be impacted. However, the current Project has set aside this area with a buffer area shown on the site plan, so a DBESP is no longer required. The drainage and a 10-foot buffer "avoidance" area will be set aside as a condition of approval, as shown on the site plan and grading plan, so there will be no impacts in this regard, no subsequent regulatory permitting is required, and no mitigation is required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Narrow Endemic Plant Species (NEPS)

The JPR/HANS states...*"The Project site is not located in a Narrow Endemic Plant Species Survey Area (NEPSSA) so there are no impacts in this regard."* The Project site is still not located within a NEPS area and contains no suitable habitat for any native plant species. In addition, it is regularly disced which would inhibit the establishment of native plants on the site. Therefore, there are no impacts in this regard and no mitigation is required.

Criteria Area Plant Species (CAPS)

The JPR/HANS states...*"The project site is not located in a Criteria Area Special Survey Area (CASSA)."* The Project site is still not located within a CAPS area and contains no suitable habitat for any native plant species. In addition, it is regularly disced which would inhibit the establishment of native plants on the site. Therefore, there are no impacts in this regard and no mitigation is required.

Additional Survey Needs - Burrowing Owl

The Project site is located within a MSHCP-designated assessment area for BUOW which is a priority 2 California Species of Special Concern (SSC) and is a Covered species under the MSHCP. Habitat for the BUOW primarily consists of open grasslands, but it can also occur in disturbed areas including agriculture. BUOW most often utilize burrows of other animals, mainly California ground squirrel (*Spermophilus beecheyi*) but can also use larger mammal burrows. Per the MSHCP guidelines, the Project site and adjacent lands within a 500-foot radius around the site were previously evaluated for BUOW habitat.

The JPR/HANS states...*"The project site is located in an Additional Survey Area for Burrowing Owl....There are records of burrowing owls in the Winchester area, but only where required habitat conditions are present. The Project site has no cover or objects or existing burrows, and it is surrounded by roads and developed areas. According to the Habitat Assessment Report dated June 23, 2010, since the site is deeply disked or grubbed at least once or twice a year, any burrows would be destroyed in the process; therefore, the potential of the project site as a burrowing owl habitat is minimal". The Permittee indicates that the site does not support suitable habitat and therefore no focused surveys were conducted. Based on the information provided by Dr. Callahan and the Permittee, the project demonstrates compliance with Section 6.3.2 of the MSHCP."*

As noted previously, the Project site still has essentially the same physical conditions that were noted in the *Bio Report* and JPR/HANS. There would be no significant impacts to this species and no mitigation is required. However, a pre-construction survey for this species is appropriate due to its ability to rapidly inhabit disturbed land. **Mitigation Measures MM-BIO-1 and MM-BIO-2** are therefore required to ensure there will be no impacts to this MSHCP covered species.

Guidelines Pertaining to the Urban/Wildlands Interface

MSHCP Section 6.1.4 provides recommendations and guidelines to minimize potential "edge effects" resulting from development projects being located next to MSHCP Reserve Assembly

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

or MSHCP conserved resources. Edge effects include adverse direct and indirect effects to species, habitats and vegetation communities along the natural urban/wildlands interface, predation by native and non-native predators, invasion by exotic species, noise, lighting, urban runoff and other human-related impacts such as trampling of vegetation, trash and toxic materials dumping. Physical measures such as buffers and/or barriers are typically installed to control drainage, toxics, lighting, noise, and invasive species.

The JPR/HANS states..."The property is not located near future and existing Conservation Areas." The Project site is still not located within or near a Conservation Area or MSHCP Reserve Land so there will be no impacts related to edge effects and no mitigation is required.

MSHCP Mitigation Fee

Section 6 of the MSHCP requires:

“Payment of the mitigation fee and compliance with the requirements of Section 6.0 are intended to provide full mitigation under the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), Federal Endangered Species Act, and California Endangered Species Act for impacts to the species and habitats covered by the MSHCP pursuant to agreements with the U.S. Fish and Wildlife Service, the California Department of Fish and Wildlife and/or any other appropriate participating regulatory agencies and as set forth in the Implementing Agreement for the MSHCP.”

The MSHCP Mitigation Fee has been established to provide mitigation for biological impacts from projects within the MSHCP area. This is not considered unique mitigation under CEQA.

Stephens’ Kangaroo Rat HCP

A Habitat Conservation Plan (HCP) for the endangered Stephens’ kangaroo rat (SKR) was adopted by the Riverside County Habitat Conservation Agency (RCHCA) prior to approval of the MSHCP. The SKR HCP mitigates impacts from development on the SKR by establishing a network of preserves and a system for managing and monitoring them. The proposed Project is located within the SKR HCP area so it will be required to pay the mitigation fee. A condition of approval will be placed on the Project for SKR HCP fee payment – this is considered regulatory compliance and not unique mitigation under CEQA. There are no impacts, and no mitigation is required.

The preceding analysis demonstrates that the proposed Project is still consistent with applicable requirements of the MSHCP. All projects are required to pay a “Local Development Mitigation Fee” under the MSHCP at the time of building permit issuance, and the proposed Project will pay the established fee. With payment of the MSHCP fee and implementation of **Mitigation Measures MM-BIO-1** and **MM-BIO-2**, the proposed Project will comply with the requirements of the MSHCP, Therefore, the proposed Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (i.e., impacts are less than significant).

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

- b) *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?*

Less Than Significant with Mitigation Incorporated

The MSHCP analysis discussed in Threshold 7.a above indicated that none of the listed or sensitive species of plants or animals covered by the MSHCP were on or adjacent to the Project site. The only potential caveat to that conclusion is the fact that burrowing owls can quickly inhabit disturbed land, so a pre-construction survey was required (see **Mitigation Measures MM-BIO-1** and **MM-BIO-2**). While some of these species have been observed in the surrounding area in the past, the Project site does not contain or support any of these species due to its historical and ongoing level of disturbance and human activity.

In addition to species covered by the MSHCP, nesting bird species are protected by California Fish and Game Code Sections 3503 and 3503.5 and by the Migratory Bird Treaty Act (MBTA) of 1918 (16 USC 703-711), which make it unlawful to take, possess, or needlessly destroy the nest or eggs of any migratory bird or bird of prey.

There are several mature trees immediately adjacent to the site to the west on the neighboring parcel. These trees may provide suitable nesting habitat for a number of migratory bird species known to nest in the surrounding region. Impacts to nesting bird species must be avoided at all times. The period from approximately February 1 to August 31 is the expected breeding season for bird species occurring in the Project area. Under **Mitigation Measure MM-BIO-3**, if Project activity or vegetation removal or adjacent disturbance must be initiated during the breeding season, a qualified biologist will check for nesting birds within three days prior to such activity. If active bird nests are found, avoidance buffers will need to be established and observed. With the implementation of **Mitigation Measure MM-BIO-3**, impacts to nesting birds will be less than significant.

In summary, implementation of the proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any endangered or threatened species as discussed in Threshold 7.a. and Thresholds 7.c., 7.d, and 7.e. With the incorporation of **Mitigation Measures MM-BIO-1** through **MM-BIO-3**, potential impacts to listed or sensitive species will be reduced to less than significant levels. The Project will be required to pay applicable MSHCP Mitigation Fees pursuant to Ordinance No. 810.2, and the site is not within the SKR HCP fee area. These are standard fees and are not considered unique mitigation under CEQA. Any impacts will be less than significant with the proposed mitigation.

- c) *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?*

Less Than Significant with Mitigation Incorporated

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Discussion is referenced in Threshold 7.a and Thresholds 7.d, 7.e., and 7.f. Based on this data, the Project will not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Wildlife Service. Mitigation Measures related to burrowing owl (**MM-BIO-1** and **MM-BIO-2**) and nesting birds (**MM-BIO-3**), as well as standard conditions for payments of applicable MSHCP fee, will ensure all direct or indirect impacts on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service remain at less than significant levels.

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

Nesting bird species are protected by California Fish and Game Code Sections 3503 and 3503.5 and by the MBTA of 1918 (16 USC 703-711), which makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any migratory bird or bird of prey. A number of resident and migratory birds utilize the general Project area although the site itself is disturbed and contains no native habitat. However, the land immediately west of the site contains trees, and lands in the immediate vicinity of the Project contain trees, shrubs, and grasslands that may provide potential suitable nesting habitat for migratory bird species.

Impacts to nesting bird species must be avoided at all times. The period from approximately February 1 to August 31 is the expected breeding season for bird species occurring in the Project area, including raptors. Under **Mitigation Measure MM-BIO-3**, if Project activity or vegetation removal is initiated during the breeding season, a qualified biologist shall check for nesting birds within three days prior to such activity. If active bird nests are found, avoidance buffers of 1,000 feet for large birds of prey, 500 feet for small birds of prey, and 250 feet for songbirds, decided by CDFW on a case-by-case basis, will need to be observed and implemented. With the implementation of **Mitigation Measures MM-BIO-1** through **MM-BIO-3**, impacts to nesting birds (including burrowing owl) will be less than significant.

e) Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?

No Impact

As discussed under Threshold 7.a, the Project will not impact any potential riparian/riverine or vernal pool areas and the existing overall hydrologic flow regime will remain unchanged. The Project site does not contain any drainage channels or features that fall under the jurisdiction of federal or state resource agencies. However, there is an ephemeral drainage in the southern portion of the site. During the *JPR/HANS* process, the County’s Environmental Programs Department requested a DBESP report as part of the conditions of approval if the drainage was going to be impacted. In the previous project, the drainage was going to be

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

impacted. However, the current Project has set aside this area with a buffer area shown on the site plan, so a DBESP is no longer required. The drainage and a 10-foot buffer “avoidance” area have been set aside, as shown on the site plan and grading plan, so there will be no impacts in this regard and no subsequent regulatory permitting is required. Therefore, the Project will not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service. No impact will occur, and no mitigation is required.

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

No Impact

No onsite drainage or habitat meeting the criteria of a wetlands or vernal pool was detected on the Project site. Therefore, no impacts to vernal pools will occur with Project implementation. In addition, no habitat for fairy shrimp was detected on the Project site when the *Bio Report* and *JPR/HANS* documents were prepared and based on a site visit site by Tim Searl on May 3, 2020, conditions have not changed since that time. Therefore, the Project will not 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 will occur, and no mitigation is required.

- g) *Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

No Impact

The Project site does not contain any native or naturalized tree species, so the County's Oak Tree Management Guidelines would be applicable. The provisions of County Ordinance No. 559 would not apply since the Project site is not above 5,000 feet in elevation. No other tree preservation or other local policy or ordinance relative to biological resources apply to the Project site. Therefore, the proposed Project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. There are no impacts, and no mitigation is required.

Mitigation:

- MM-BIO-1** A 30-day preconstruction survey for burrowing owl is required by the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) to confirm the presence or absence of burrowing owl on the Project site. The survey shall be conducted by a qualified biologist no more than 30 days prior to ground disturbance in accordance with MSHCP survey requirements to avoid direct take of burrowing owl. If burrowing owl are determined to occupy the Project site or immediate vicinity, the County will be notified, and avoidance measures will be implemented, as appropriate, pursuant to the MSHCP, the

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

California Fish and Game Code, the Migratory Bird Treaty Act, and the mitigation guidelines prepared by the CDFW (2012).

The following measures are recommended in the California Department of Fish and Wildlife (CDFW) guidelines to avoid impacts on an active burrow:

- No disturbance shall occur within 50 meters (approximately 160 feet) of occupied burrows during the non-breeding season.
- No disturbance shall occur within 75 meters (approximately 250 feet) of occupied burrows during the breeding season.

To prevent unavoidable impacts, passive or active relocation of burrowing owls shall be implemented by a qualified biologist outside the breeding season, in accordance with procedures set by the MSHCP and in coordination with the CDFW.

MM-BIO-2 If active burrowing owl burrows are detected outside the breeding season (September through January) during the survey outlined in **MM-BIO-1**, or within the breeding season but owls are not nesting or in the process of nesting, passive relocation may be conducted following consultation with the CDFW and the United States Fish and Wildlife Service (USFWS). Construction activity may not occur within 500 feet of the active burrow. If active nests are identified onsite, the nests shall be avoided, or the owls actively or passively relocated to an appropriate offsite location to the satisfaction of the USFWS or the CDFW. To avoid active nests adequately, no grading or heavy equipment activity shall take place within 250 feet of an active nest during the breeding season (February 1 through August 31) and 160 feet during the non-breeding season. This measure shall be implemented to the satisfaction of the County of Riverside Planning Department.

If active burrowing owl burrows are detected outside the breeding season, passive and/or active relocation may be undertaken following consultation with and approval by the CDFW and/or USFWS. One-way doors may be installed as part of a passive relocation program. Burrowing owl burrows shall be excavated with hand tools by a qualified biologist when determined to be unoccupied, and back filled to ensure that animals do not re-enter the holes/dens. This measure shall be implemented to the satisfaction of the County Resource Conservation Authority (RCA).

MM-BIO-3 If grading is to occur during the nesting season (February 1 – August 31), a pre-construction nesting bird survey shall be conducted within a maximum of three (3) days prior to the start of onsite equipment mobilization and staging, clearing, grubbing, vegetation removal, or grading, whichever occurs first. This survey shall be conducted by a qualified biologist holding a Memorandum of Understanding (MOU) with Riverside County. The findings shall be submitted to the County of Riverside Planning Department for review and approval prior to issuance of any ground disturbing activity.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

Surveys shall be conducted in proposed work areas, staging and storage areas, and soil, equipment, and material stockpile areas. For passerines and small raptors, surveys shall be conducted within a 250-foot radius surrounding the work area (in areas where access is feasible). For larger raptors, the survey area shall encompass a 500-foot radius. Surveys shall be conducted during weather conditions suited to maximize the observation of possible nests and shall concentrate on areas of suitable habitat. If a lapse in project-related work of five (5) days or longer occurs, an additional nest survey shall be required before work can be reinitiated. If nests are encountered during any preconstruction survey, a qualified biologist shall determine if it may be feasible for construction to continue as planned without impacting the success of the nest, depending on conditions specific to each nest and the relative location and rate of construction activities.

If the qualified biologist determines construction activities have potential to adversely affect a nest, the biologist shall immediately inform the construction manager to halt construction activities within minimum exclusion buffer of 250 feet for songbird nests, and 300 to 500 feet for raptor nests, depending on species and location. Active nest(s) within the Project site shall be monitored by a qualified biologist during construction if work is occurring directly adjacent to the established no-work buffer. Construction activities within the no-work buffer may proceed after a qualified biologist determines the nest is no longer active due to natural causes (e.g., young have fledged, predation, or other non-human causes of nest failure).

Monitoring: Provide results of burrowing owl and nesting bird surveys to County of Riverside for review and approval.

CULTURAL RESOURCES Would the Project:				
8. Historic Resources	☐	☐	☒	☐
a) Alter or destroy a historic site?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☐	☒	☐

Source(s): *Update to Historical/Archaeological Resources Survey Report Assessor's Parcel Number 476-010-060*, prepared by CRM TECH, 10-7-2020 (*H/ARS Report, Appendix D*); Public Resources Code (PRC) §5020.1(j); and 14 California Code of Regulations §15064.5(a)(1)-(3).

Findings of Fact:

a) *Would the Project alter or destroy a historic site?*

Less Than Significant Impact

The Project site was previously surveyed in 2014, but an updated cultural resources (historical and archaeological) assessment was prepared by CRM TECH in October of 2020. The

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

historical and archaeological resources survey (*H/ARS Report*) of the Project site included a review of an archaeological records search at the Eastern Information Center (EIC) at the University of California at Riverside in order to assess previous archaeological studies and identify any previously recorded sites within the Project boundaries, or in the immediate vicinity. EIC records indicate that the Project area had not been surveyed for cultural resources prior to this study, and no cultural resources had been recorded within or adjacent to the Project boundaries.

The *H/ARS Report* documented two previously recorded linear sites of historical origin, Winchester Road and Keller Road, just outside the Project boundaries. However, it determined neither one demonstrated sufficient historic integrity to be considered a potential “historical resource,” as defined by CEQA. Therefore, the *H/ARS Report* concluded they did not represent an impact to cultural (historical) resources.

The records search for this study was completed by the staff of the Eastern Information Center (EIC), University of California, Riverside on August 27, 2020. The results of the records search indicate that nine additional cultural resources studies within a one-mile radius of the project location have been curated at EIC since the 2014 study. With the exception of an archaeological monitoring program in the adjacent Winchester Road right-of-way, none of these studies occurred in the immediate vicinity of the Project site.

Other than those identified in the 2014 study, no historical/archaeological resources have been recorded within the scope of the records search since that time. However, two additional sites that had been recorded previously have been determined to be in the records search scope. In all, there are now a total of 33 cultural resources identified by EIC records within the one-mile radius of the Project site, including 13 prehistoric sites, 13 historic-period sites, and 7 prehistoric isolates, as listed in **Table 8-1, Recorded Cultural (Historical) Resources in the Project Area**. With the exception of Winchester Road (Site 33-013871) and Keller Road (Site 33-020545), none of these resources were found within a quarter mile of the Project boundaries.

Table 8-1
Recorded Cultural (Historical) Resources in the Project Area

Primary #	Date Recorded	Description/Trinomial #	Distance/ Direction to Site
33-003844	1990-1999	Farmstead, ca. 1890 (CA-RIV-3844H)	0.48 mile to south
33-007798	1983	Vernacular wood-frame building	0.91 mile to north
33-007799	1983-2013	Farmstead	0.34 mile to southeast
33-007802	1983	Vernacular wood-frame house	0.33 mile to northeast
33-009478	1999	Farmstead remains (CA-RIV-6378H)	0.67 mile to southwest
33-011233	2001-2011	Cobblestone retaining wall	0.84 mile to southwest
33-011234	2001-2012	Metal water tank	0.87 mile to southwest
33-011258	2001-2011	Refuse scatter	0.43 mile to northeast
33-013871	2002-2012	Winchester Road (State Route 79) (CA-RIV-11964H)	Adjacent to east
33-016682	2005	Concrete and metal culvert	0.82 mile to northeast
33-016684	2006-2011	Prospector's pit (CA-RIV-8736H)	0.64 mile to northeast
33-020545	2011	Keller Road (CA-RIV-10446H)	Adjacent to north
33-021033	2012-2017	Farm complex remains	0.73 mile to southeast

Source: *H/ARS Report (Appendix D)*

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

At present, roughly half of the land within a one-mile radius of the Project site has been previously surveyed. Three archaeological sites were found but these are of prehistoric (i.e., Native American) or archaeological origin and none were determined to be historic. For a discussion of archaeological resources, see Threshold 9.

A field survey, conducted on July 31, 2019, found no potential “historical resources” on or adjacent to the Project site such as buildings, structures, objects, sites, features, or artifact deposits of prehistoric or historical origin. Field observations confirmed past disturbance on the site and the *H/ARS Report* concluded the Project area appeared unlikely to contain intact, potentially significant archaeological remains of prehistoric or early historical origin in buried deposits.

The Pechanga Band of Luiseño Mission Indians (Pechanga Band) has indicated that this entire region contains cultural and historical resources relative to their tribe. Therefore, there is a potential to discover unanticipated tribal resources during grading on this site. Archaeological resources are addressed in Threshold 9.

Based on available evidence, there is a low potential to disturb historical resources as defined by CEQA during grading, therefore, impacts in this regard are less than significant.

b) Would the Project cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?

Less Than Significant Impact

According to Public Resources Code (PRC) §5020.1(j), “historical resource” includes, but is not limited to, any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

More specifically, CEQA guidelines state that the term “historical resources” applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency (Title 14 CCR §15064.5(a)(1)-(3)). Regarding the proper criteria for the evaluation of historical significance, CEQA guidelines mandate that “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” (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

The proposed Project site does not have any historic resources and the site itself does not satisfy any of the criteria for a historic resource defined in Section 15064.5 of the State CEQA Guidelines.

The Project site is not listed with the State Office of Historic Preservation or the National Register of Historic Places.

The Pechanga Band has previously indicated that tribal historical events have occurred in the past in this region, therefore, there is a potential to find unanticipated tribal resources during grading of this site. These impacts are addressed in Threshold 9.

Based on available evidence, the Project will not cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5. Any impacts will be less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

9. Archaeological Resources	☐	☒	☐	☐
a) Alter or destroy an archaeological site?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Source(s): *Update to Historical/Archaeological Resources Survey Report Assessor's Parcel Number 476-010-060*, prepared by CRM TECH, 10-7-2020 (*H/ARS Report, Appendix D*); Public Resources Code (PRC) §5020.1(j); Health and Safety Code § 7050.5; and 14 California Code of Regulations §15064.5(a)(1)-(3).

Findings of Fact:

a) *Would the Project alter or destroy an archaeological site?*

Less Than Significant with Mitigation Incorporated

The *H/ARS* did not identify the presence of any cultural resources (which includes archaeological resources) on the Project site. In all, there are now a total of 33 cultural resources identified by EIC records within the one-mile radius of the Project site, including 13 prehistoric sites and 7 prehistoric isolates, as listed in **Table 9-1, Recorded Cultural (Archaeological) Resources in the Project Area**.

At present, roughly half of the land within a one-mile radius of the Project site has been surveyed, resulting in the identification of three archaeological sites. All of these known sites were of prehistoric (i.e., Native American) origin and all were found on the slopes of the rolling hills surrounding the Project site. The closest one, Site 33-000366, is located approximately

0.35 mile east of the Project site and is described as a habitation area with a possible petroglyph, several bedrock milling features, and lithic scatters. The other two sites, 33-002058 and 33-003838, were recorded more than a half mile to the northeast and the north of the Project site, respectively, and consisted of a bedrock milling slick and a small scatter of groundstone and flaked-stone artifacts. None of these three sites were found in the immediate vicinity of the Project site. A field survey, conducted on July 31, 2019, found no potential resources of prehistoric origin on or adjacent to the Project site.

**Table 9-1
Recorded Cultural (Archaeological) Resources in the Project Area**

Primary #	Trinomial	Date Recorded	Description	Distance/ Direction to Site
33-001105	CA-RIV-1105	1965-2012	Pictographs reported in 1965 but not found in later site visits	0.75 mile to southwest
33-001270	CA-RIV-1270	1978-1999	Chipped-stone and groundstone artifacts	0.55 mile to south
33-003843	CA-RIV-3843	1990-2011	Prehistoric milling/habitation site	0.8 mile to southwest
33-003845	CA-RIV-3845	1990	Prehistoric milling site	0.65 mile to southeast
33-003846	CA-RIV-3846	1990	Prehistoric milling site	0.7 mile to southeast
33-008859	CA-RIV-6289	1999	Milling slicks with groundstone artifacts	0.9 mile to east
33-008860	CA-RIV-6290	1999	Milling slicks with groundstone artifacts	0.92 mile to east
33-008863	CA-RIV-6293	1999	Milling slicks	0.68 mile to northeast
33-008932	CA-RIV-6339	1999	Milling slick	0.6 mile to southwest
33-008933	CA-RIV-6340	1999	Milling slicks	0.64 mile to southwest
33-011224		2001-2009	Bedrock milling feature	0.7 mile to southwest
33-011225		2001-2011	Milling slick	0.91 mile to southwest
33-011226		2001	Milling slicks	0.76 mile to west
33-011229		2001	Isolate: complete metate	0.5 mile to southwest
33-011230		2001-2011	Isolate: metate and hammerstone fragments	0.46 mile to southwest
33-011231		2001-2011	Isolate: metate fragment	0.6 mile to southwest
33-011232		2001-2011	Isolate: metate and hammerstone fragments	0.52 mile to southwest
33-014715		2003	Isolate: lithic flake	0.52 mile to southeast
33-017628		2008	Isolate: groundstone fragments	0.38 mile to southwest
33-021114		2012	Isolate: mano	0.88 mile to southeast

Source: H/ARS Report (Appendix D)

The Pechanga Band has indicated that tribal historical events have occurred in the past in this region, so there is a potential to find unanticipated tribal resources during grading of this site. **Mitigation Measures MM-CUL-1 and MM-CUL-2** shall be implemented which provide procedures to be followed in the event an unanticipated resource is identified during ground disturbing activities. With implementation of these measures, potential impacts that could alter or destroy an archaeological site will be reduced to less than significant levels.

b) Would the Project cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?

Less Than Significant with Mitigation Incorporated

As discussed in Threshold 9.a, it has been determined that there are no known significant archaeological resources as defined in California Code of Regulations, Section 15064.5 on or

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

adjacent to the Project site. However, the Pechanga Band has indicated that tribal historical events have occurred in the past in this region, so there is a potential to find unanticipated tribal resources during grading of this site. In the event unanticipated resources are identified, **Mitigation Measures MM-CUL-1** and **MM-CUL-2** are required which provide procedures to be followed in the event an unanticipated resource is identified during ground disturbing activities. With implementation of these measures, potential impacts that could cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5 will be reduced to less than significant levels.

c) *Would the Project disturb any human remains, including those interred outside of formal cemeteries?*

Less Than Significant with Mitigation Incorporated

Based on input provided by the Pechanga Band, there is a potential for human remains to be present in the Project area. In order to reduce potentially significant impacts to previously unknown human remains that may be unexpectedly discovered during Project implementation. County conditions of approval and State Law require that in the unlikely event that human remains are uncovered, the contractor is required to halt work in the immediate area of the find and to notify the County Coroner, in accordance with Health and Safety Code § 7050.5, who must then determine whether the remains are of forensic interest. If the Coroner, with the aid of a supervising archaeologist, determines that the remains are or appear to be of a Native American, he/she must contact the Native American Heritage Commission for further investigations and proper recovery of such remains, if necessary.

Further, pursuant to Public Resource Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "most likely descendant". The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Thus, compliance with the above-referenced state laws, as well as implementation of **Mitigation Measures MM-CUL-1** and **MM-CUL-2**, will reduce any Project impacts that could disturb any human remains, including those interred outside of formal cemeteries to less than significant levels.

Mitigation:

- MM-CUL-1** Native American Monitoring will be required so that in the event previously unidentified subsurface tribal cultural resources are discovered during grading, they will be handled appropriately and impacts in this regard will be less than significant with mitigation incorporated.
- MM-CUL-2** CEQA Guidelines Section 15064.5 (e) specifically addresses what to do in the event that human remains are accidentally discovered in any location other than a dedicated cemetery. Although this is State law, a condition of approval has been placed on this and every project so that in the event previously unidentified

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

subsurface human remains are discovered during grading they will be handled appropriately and impacts in this regard will be less than significant with mitigation incorporated.

Monitoring: Grading activities shall be monitored as outlined in the recommended measures which will be included in a Mitigation Monitoring and Reporting Program for the Project.

ENERGY Would the Project:				
10. Energy Impacts				
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Source(s): *Temecula Valley Self Storage Air Quality and Greenhouse Gas Impact Study*, prepared by RK Engineering Group, Inc., 1-15-2021 (AQ/GHG Study, **Appendix B**).

Note: Any tables in this section are from the *AQ/GHG Study*, unless otherwise noted.

Findings of Fact:

a) *Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?*

Less Than Significant Impact

Project energy consumption includes both construction and operational energy demand. Construction energy demand accounts for anticipated energy consumption during construction facilitated by the Project, such as fuel consumed by construction equipment and construction workers' vehicles traveling to and from the construction site. Operational energy demand accounts for the anticipated energy consumption during operation of the Project, such as fuel consumed by vehicles traveling to and from the Project; natural gas consumed for heating building spaces; and electricity consumed for building power needs, including, but not limited to lighting, water conveyance, and air conditioning.

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate air pollutant and GHG emissions resulting from the Project. The CalEEMod results also provide the average travel distance, vehicle trip numbers, and vehicle fleet mix during construction and operation of the Project. The CalEEMod results additionally provide the estimated gross electricity and natural gas consumption by land use during operation of the Project. The values contained therein were used in the *AQ/GHG Study* to determine the anticipated energy consumption during construction and operation of the Project. The following summarizes the Project's construction and operational energy demand.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Construction

Energy would be used during construction and would be primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. Temporary grid power may also be provided to construction trailers or electric construction equipment. **Table 10-1, Construction Off-Road Equipment Energy Demand**, and **Table 10-2, Construction On-Road Trips Energy Demand**, illustrate the anticipated transportation energy demand from operation of construction equipment and vehicles and construction worker trips to and from the Project site during construction. As shown in **Table 10-3, Project Construction Energy Demand**, construction of the Project would require an estimated 2,022 gallons of gasoline and 1,890.5 gallons of diesel in total.

Potentially
Significant
Impact

Less than
Significant
with
Mitigation
Incorporated

Less
Than
Significant
Impact

No
Impact

Table 10-1
Construction Off-Road Equipment Energy Consumption

Phase ¹	Phase Duration (Days) ¹	Equipment ¹	Amount ¹	Hours/ Day ¹	Horsepower (HP) ¹	Load Factor ¹	HP-hrs ²	Fuel Consumption Rate ³ (HP-hr/gal)	Diesel Fuel Consumption (gal.)	Diesel Fuel Consumption (gal.)	MBtu ⁴
Site Preparation	2	Grader	0	0	187	0.40	0	18.5	0	280.0	38.467
		Tractors/Loaders/Backhoes	4	8	97	0.37	2,297.0		124.2		
		Rubber-Tired Dozers	3	8	158	0.38	2,881.8		155.8		
Grading	5	Grader	1	8	187	0.41	3,066.8		165.8	684.0	93.968
		Tractors/Loaders/Backhoes	3	8	97	0.37	4,306.8		232.8		
		Excavator	1	6	350	0.50	5,250.0		285.4		
Building Construction	176	Forklift	3	8	84	0.20	70,963.2		3,835.8	18,338.3	2,519.334
		Generator Sets	1	8	84	0.74	87,521.3		4,730.9		
		Tractors/Loaders/Backhoes	3	8	97	0.37	151,599.3		8,194.6		
		Welders	1	8	46	0.45	29,173.8		1,577.0		
Paving	20	Cement/Motor Mixer	2	8	135	0.38	16,416.0		887.4	3,428.8	471.052
		Pavers	1	8	130	0.42	8,736.0		472.2		
		Paving Equipment	3	8	132	0.36	22,809.6		1,233.0		
		Rollers	2	8	80	0.38	9,728.0		525.8		
		Tractors/Loaders/Backhoes	1	8	97	0.37	5,742.4		310.4		
Architectural Coatings	10	Air Compressors	1	6	78	0.48	2,246.4		121.4	121.4	16.682
Total Energy Requirements									22,852.5	3,139.503	

¹ AQ/GHG Study

² SCAQMD Air Quality Analysis Handbook

³ Source: EMFAC2014 Web Database. <https://www.arb.ca.gov/emfac/2014/>

⁴ MBtu/yr. = Millions of Btu per year; assuming 1 gallon of gasoline fuel = 120,429 Btu and 1 gallon of diesel fuel = 137,381 Btu

Potentially
Significant
Impact

Less than
Significant
with
Mitigation
Incorporated

Less
Than
Significant
Impact

No
Impact

Table 10-2
Construction On-Road Trips Energy Consumption

Construction Phase ¹	Phase Duration (Days) ¹	Trips /Day ¹	Trip Length ¹	Phase VMT	Vehicle Class ¹	Vehicle Mix ¹	Average Fuel Economy (MPG) ²	Gasoline			Diesel			Total MBtu ³
								Fuel Split ²	Fuel Consumption by Class (gal.)	Fuel Consumption (gal.)	Fuel Split ²	Fuel Consumption by Class	Fuel Consumption (gal)	
Worker Trips														
Site Preparation	2	18	14.7	529	LDA LDT 1 LDT2	0.50 0.25 0.25	28.57 23.26 20.73	0.9926 0.9991 0.9986	45.96 28.41 31.87	21.25	0.0074 0.0009 0.0014	0.34 0.03 0.04	0.08	2.57
Grading	5	15	14.7	1,102	LDA LDT 1 LDT 2	0.50 0.25 0.25	28.57 23.26 20.73	0.9926 0.9991 0.9986	76.61 47.36 53.11	44.27	0.0074 0.0009 0.0014	0.57 0.04 0.07	0.17	3.70
Building Construction	176	17	14.7	43,983	LDA LDT 1 LDT2	0.50 0.25 0.25	28.57 23.26 20.73	0.9926 0.9991 0.9986	998.45 617.21 692.19	1,766.01	0.0074 0.0009 0.0014	7.44 0.56 0.97	86.86	213.63
Paving	10	15	14.7	2,205	LDA LDT 1 LDT 2	0.50 0.25 0.25	28.57 23.26 20.73	0.9926 0.9991 0.9986	76.61 47.36 53.11	88.54	0.0074 0.0009 0.0014	0.57 0.04 0.07	0.35	10.71
Architectural Coating	10	3	14.7	441	LDA LDT 1 LDT2	0.50 0.25 0.25	28.57 23.26 20.73	0.9926 0.9991 0.9986	15.32 9.47 10.62	17.71	0.0074 0.0009 0.0014	0.11 0.01 0.01	0.07	2.14
Sub-Total Worker Trips Energy Consumption								Gasoline (gal.)		1,937.78	Diesel (gal.)		7.53	232.75
Vendor Trips														
Building Construction	176	7	6.9	8,501	MHDT HHDT	0.50 0.50	8.50 5.85	0.1403 0.0097	91.68 9.21	77.20	0.8597 0.9903	429.89 719.52	1,149.41	167.21
Hauling Trips														
Grading	5	43.33	20.0	4,333	HHDT	1.00	5.85	0.0097	21.56	7.19	0.9903	733.56	733.56	101.64
Total On-Road Construction Trips Energy Usage								Gasoline (gal.)		2,022.08	Diesel (gal.)		1,890.50	501.60

¹ AQ/GHG Analysis

² SCAQMD Air Quality Analysis Handbook

³ MBtu/yr. = Millions of Btu per year; assuming 1 gallon of gasoline fuel = 120,429 Btu and 1 gallon of diesel fuel = 137,381 Btu

**Table 10-3
Project Construction Energy Demand**

Fuel Consumption (Gallons)		
Source	Gasoline	Diesel
Off-Road Construction		
Equipment & Hauling Trips	--	22,852.50
On-Road Construction		
Worker Trips	1,937.78	7.53
Vendor and Hauling Trips	84.39	1,882.97
Total	2,022.08	1,890.50

Notes: See Tables 10-1 and 10-2 based on CalEEMod default values for fleet mix and average distance of travel and energy calculation sheets.

Construction of the Project would be required to comply with Title 24 of the California Code of Regulations – the California Building Code (CBC) – which includes specific requirements related to recycling, construction materials, and energy efficiency standards. Specifically, Part 11 of the CBC, the California Green Building Code (CALGreen), contains mandatory and voluntary green building standards pertaining to issues such as outdoor water usage and the disposal of construction waste. For example, CALGreen would require the Project to recycle and/or salvage at least 50 percent of non-hazardous construction debris, which would reduce the energy necessary to transport and dispose of this material. Compliance with these measures would avoid wasteful, inefficient, and unnecessary energy consumption. These are standard conditions and are not considered unique mitigation under CEQA.

Operation

Energy use during operation of the Project would be the result of transportation fuel consumption from vehicles traveling to and from the Project and natural gas and electricity consumption from power and heating requirements for buildings and associated amenities. Tables 12 and 13 in the *AQ/GHG Study* estimated the Project would generate 956,740 vehicle miles traveled (VMT) with 55% (526,307) of those miles from passenger vehicles (automobiles). The remaining 45% (430,533) of the VMT would be generated by trucks of various kinds and other vehicles. The average fuel consumption of automobiles at Project buildout is estimated to be 25 miles per gallon while the fuel consumption of trucks and other vehicles is estimated to be 18.5 miles per gallon. **Table 10-4, Annual Motor Vehicle Fuel Consumption Upon Full Operation**, shows annual vehicle miles traveled (VMT) and estimated fuel consumption after completion of the Project. As shown in **Table 10-4**, Project operation would consume an estimated 21,052 gallons of gasoline fuel and 23,272 gallons of diesel fuel per year during full operation. This would represent less than 0.01 percent of transportation-related energy consumption in Riverside County (as of 2020).

Table 10-4
Annual Motor Vehicle Fuel Consumption Upon Full Operation

Fuel Type	Project (gallons)	Riverside County (gallons)	Proportion of 2020 Countywide Consumption (%)
Gasoline	21,052.28	1,052,000,000	<0.01
Diesel	23,272.05	290,200,000	<0.01
Total	44,324.33	1,342,200,000	<0.01

Notes: Calculations assume (1) 526,307 VMT for automobiles with 25 miles/gallon fuel efficiency for gasoline; and (2) 430,533 VMT for trucks and other vehicles with 18.5 miles/gallon fuel efficiency for diesel.

Operation of the Project would also consume electricity for building power, lighting, and water conveyance, among other operational requirements.

Table 10-5, Annual Electricity Consumption Upon Full Buildout, shows electricity consumption at full buildout of the Project. As shown **Table 10-5**, the Project would result in an estimated 2.6 kWh/sf for the self-storage structures per year. When compared to the energy consumption rates provided by the United States Energy Information Administration (EIA) for similar land uses, the Project would be more energy-efficient in its electricity consumption than the nationwide average.

Table 10-5
Annual Electricity Consumption Upon Full Buildout

Project	Project Square Footage	Project Electricity Consumption	Project Consumption (per Square Foot)	Nationwide Average (per Square Foot)
Electricity		kWh	kWh	kWh
Self-Storage Buildings	126,379	323,783	2.6	6.6

Notes: Electricity consumption is expressed in terms of kilowatt-hours (kWh). For comparison to nationwide averages, the self-storage buildings were measured against commercial land uses with the principal building activity as Self-Storage was measured against similar commercial land uses. All calculations required for this table are based on Table 14 from the AQ/GHG Study (**Appendix B**).

Operation of the Project would also consume natural gas primarily for building heating. **Table 10-6, Annual Natural Gas Consumption Upon Full Buildout**, displays natural gas consumption under full buildout of the Project after completion of the Project. As shown in **Table 10-6**, the Project would result in the consumption of an estimated 278,510 kBtu or 2.2 kBtu per square foot for the self-storage buildings per year. When compared to the energy use intensity (EUI) rates provided by the EIA for the closest applicable land uses, the Project would be more energy-efficient in its natural gas consumption than the nationwide average.

In addition, the Project will install photovoltaic solar energy systems on the roofs of the Project buildings consistent with the requirements of Climate Action Plan (CAP) Energy Measures R2-E6: *Commercial/Industrial Renewable Energy Program* and R2-E10: *On-site Renewable Energy Production Requirements for New Land Use Development Projects* as appropriate.

**Table 10-6
Annual Natural Gas Consumption Upon Full Buildout**

Project	Project Consumption (Total)	Project Consumption (per Square Foot)	Nationwide Average (per Square Foot)
Natural Gas	kBtu	kBtu/sf	kBtu/sf
Self-Storage Buildings	278,510	2.2	19.5

Notes: Natural gas consumption is expressed in terms of thousands of Btu (kBtu) and kBtu per square foot (kBtu/sf). For comparison to nationwide averages, the self-storage buildings were measured against similar types of buildings. The EUI rates provided by EIA were in the form of cubic feet of natural gas. Cubic feet of natural gas was converted to Btu at a rate of 1,037 Btu/cubic foot of natural gas, as provided in CARB's CA-GREET2.0 Model. All calculations required for this table are based on Table 14 from the *AQ/GHG Study (Appendix B)*.

The Project would be subject to the energy conservation requirements of Part 6 of the CBC – the California Energy Code – which provides energy conservation standards building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances. The California Energy Code also provides guidance on construction techniques to maximize energy conservation during operation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls and ceilings. The California Energy Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. These are standard conditions and are not considered unique mitigation under CEQA.

Because the Project would follow all local and state requirements and represents less than 0.01 percent of Riverside County annual transportation-related energy consumption and are well below nationwide averages for building energy consumption, the Project would not result in potentially significant environmental effects from wasteful, inefficient, or unnecessary consumption of energy. Any impacts will be less than significant, and no mitigation is required.

b) Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?

Less Than Significant Impact

Riverside County adopted a Climate Action Plan (CAP) in 2019. The CAP outlines strategies to achieve identified GHG reduction targets to ensure compliance with AB 32, SB 32, and Executive Order S-3-05. The CAP outlines specific reduction measures to reduce County wide GHG emissions in the categories such as energy, transportation and land use, solid waste, and community education and outreach. In addition, Chapter 9, Air Quality Element, of the County's General Plan contains several energy efficiency and energy and water conservation objectives and policies. **Table 10-7, Project Consistency with the Riverside County Energy Efficiency Strategies** illustrates the Project's consistency with applicable energy efficiency strategies contained in the County's CAP and General Plan.

Table 10-7
Project Consistency with the Riverside County Energy Efficiency Strategies

Energy Efficiency Strategy	Project Consistency
<i>Riverside County Climate Action Plan</i>	
Energy Measure R1-E1: Renewable Portfolio Standard for Building Energy Use. Energy Measure R1-E8: Renewable Portfolio Standard Related to Water Supply and Conveyance.	Consistent. The Project's electricity needs would be satisfied by SCE, which currently has a 32 percent renewable energy mix. Because Energy Measure R1-E1 and R1-E8 require that 33 percent of retail electricity is sourced from renewable energy sources in 2020 and the Project's electricity supplier is projected to achieve this goal by 2020, the Project would be consistent with these measures.
Energy Measures R1-E2 and R1-E3: AB1109 Energy Efficiency Standards for Lighting.	Consistent. The Project would be required to comply with Title 24 of the California Code of Regulations, or the CBC. Compliance with the CBC includes compliance with the California Energy Code, which would incorporate these overall energy efficiency objectives.
Energy Measure R1-E4: Electricity Energy Efficiency (AB 32). Energy Measure R1-E5: Natural Gas Energy Efficiency (AB 32).	Consistent. Similar to the Project's compliance with the above energy efficiency measure, the Project would be required to comply with Part 6 of the CBC, which is the California Energy Code. This measure requires that development in the county comply with the County's adopted Green Building ordinance and Title 24 Energy Efficiency Standards.
Energy Measure R1-E6: Increased Combined Heat and Power (AB 32).	Consistent. While the Project would not include the installation of a combined heating and power generation system, the Project's natural gas and electricity consumption would be noticeably lower than nationwide averages. Moreover, the self-storage buildings would be the only Project features that would require the consumption of natural gas would only consist of the second and third floors of Buildings G and H. Therefore, it would be infeasible to install a cogeneration system that would consume natural gas for on-site generation of electricity while utilizing the waste heat for space heating.
Energy Measure R2-E5: Commercial Energy Efficiency Program.	Consistent. The proposed Project would be constructed to the standards of Title 24 2019 which is approximately 30% more efficient than Title 24 2016.
Energy Measure R2-E6: Commercial/Industrial Renewable Energy Program. Energy Measure R2-E10: On-site Renewable Energy Production Requirements for New Land Use Development Projects.	Consistent. The Project will participate in the Energy Measures R2-E6 and R2-E10 as appropriate, which call for the incorporation of on-site renewable energy generation. Therefore, the proposed Project would be consistent with the overall renewable energy strategy of the County.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

<i>Riverside County General Plan</i>	
Policy AQ 5.1. Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills.	Consistent. Because the Project consists primarily of self-storage and RV parking land uses, solid waste generation would be substantially lower than other commercial developments of equal size.
Policy AQ 20.10 Reduce energy consumption of the new developments (residential, commercial and industrial) through efficient site design that takes into consideration solar orientation and shading, as well as passive solar design.	Consistent. The Project includes the placement of several trees surrounding the buildings, which would be utilizing tree shade to help offset the seasonal cooling and heating requirements for the buildings. Alteration of the building orientation or installing more trees for building climate control would be infeasible as the only other indoor space that is climate controlled would be the second and third stories of Buildings G and H.
Policy AQ 20.15 Decrease energy costs associated with treatment of urban runoff water through greater use of bioswales and other biological systems.	Consistent. The Project would include the installation of a bioretention and swale system on the northern end of the Project site. As a result, the bioretention and swale system would reduce the energy needs required for water treatment once that runoff reaches the appropriate treatment facilities.
Policy AQ 20.18 Encourage the installation of solar panels and other energy-efficiency improvements and facilitate residential and commercial renewable energy facilities (solar array installations, individual wind energy generators, etc.).	Consistent. While this policy's intended target is the County as opposed to individual development applicants, the Project would not facilitate greater dependence on fossil fuel energy sources.

As described in Threshold 10.a, operation of the Project would be more energy-efficient than the national averages for similar land uses with comparable energy requirements. In addition, construction of the Project would be required to comply with relevant provisions of CalGreen and the California Energy Code. As illustrated in **Table 10-7**, the Project would be mostly consistent with Riverside County's CAP and the County's General Plan Air Quality Element. The Project would be consistent with the County's CAP and General Plan by promoting greater energy independence with onsite renewable energy systems. Any impacts will be less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

GEOLOGY AND SOILS Would the Project directly or indirectly:				
11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones	☐	☐	☐	☒
a) Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

Source(s): *General Plan*, Chapter 6, Safety Element, Figure S-2 *Earthquake Fault Study Zones*; and *Map My County* (**Appendix A**).

Findings of Fact:

- a) *Would the Project directly or indirectly be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*

No Impact

According to the *General Plan* and *Map My County*, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone. There are no faults geologically mapped within or projecting toward the Project site. The Project site is not within a County Fault Hazard Zone. No impacts will occur.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

12. Liquefaction Potential Zone

- a) Be subject to seismic-related ground failure, including liquefaction?

☐
☐
☒
☐

Source(s): *Updated Preliminary Geotechnical Interpretive Report, Proposed RV and Boat Storage, Assessor's Parcel Number 476-010-060, Located at the Intersection of Highway 79 and Keller Road*, prepared by Earth Strata Geotechnical Services, Inc., 9-14-2020 (*Geo Report Appendix E1*); *General Plan*, Chapter 6, Safety Element, Figure S-3 *Generalized Liquefaction*; *Map My County* (**Appendix A**); and County of Riverside, Ordinance No. 457.

Findings of Fact:

- a) *Would the Project directly or indirectly be subject to seismic-related ground failure, including liquefaction?*

Less Than Significant Impact

According to the *Geo Report*, the Project site is within an area mapped by Riverside County as having a low to moderate potential for liquefaction. In addition, as set forth in the *Geo Report*, based on the dense to very dense nature of the very old alluvial deposits on the Project site, the potential for liquefaction and seismically-induced settlement at the Project site is not a design consideration. Furthermore, as set forth in the *Geo Report*, groundwater was not encountered in any onsite borings although they were relatively shallow at less than ten feet below the existing ground surface. The California Department of Water Resources well data indicates groundwater has been measured at depths between 28 and 30 feet below the ground surface in nearby wells in the 1960's. During the rainy season, localized perched water conditions may develop above less permeable units that may require special consideration during grading operations. Groundwater elevations and seepage are dependent on seasonal precipitation, irrigation, and land use, among other factors, and vary as a

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

result. The *Geo Report* concluded that perched groundwater could be encountered during grading and recommended procedures to follow if such conditions occur.

California Building Code (CBC) requirements pertaining to new development and construction will minimize the potential for structural failure or loss of life during earthquakes by ensuring that the proposed Project site structures are constructed pursuant to applicable seismic design criteria for the region. CBC requirements are applicable to all development; therefore, they are not considered mitigation for CEQA implementation purposes. In addition, the Project will be required to comply with recommendations provided in the *Geo Report*.

With adherence to standard conditions, any potential impacts to the Project from seismic-related ground failure, including liquefaction, will remain at a less than significant level.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

13. Ground-shaking Zone	☐	☐	☒	☐
a) Be subject to strong seismic ground shaking?				

Source(s): *Updated Preliminary Geotechnical Interpretive Report, Proposed RV and Boat Storage, Assessor's Parcel Number 476-010-060, Located at the Intersection of Highway 79 and Keller Road*, prepared by Earth Strata Geotechnical Services, Inc., 9-14-2020 (*Geo Report Appendix E1*); *General Plan*, Chapter 6, Safety Element, Figure S-4 *Earthquake-Induced Slope Instability Map*, Figures S-13 through S-21 (showing *General Ground Shaking Risk*); and *Map My County (Appendix A)*.

Findings of Fact:

a) *Would the Project directly or indirectly be subject to strong seismic ground shaking?*

Less Than Significant Impact

The Project site, like the rest of Southern California, is located within a seismically active region near the active margin between the North American and Pacific tectonic plates. The principal source of seismic activity in Southern California is movement along the northwest-trending regional faults, including the San Andreas, San Jacinto, and Elsinore faults. The *Geo Report* indicates there are ten active faults within a 50-mile radius of the Project site, as shown in **Table 13-1, Active Faults in the Project Region**.

**Table 13-1
Active Faults in the Project Region**

Fault Name	Maximum Magnitude (MW)	Geometry (Slip Character)	Slip Rate (mm./yr.)	Distance from Site (mi.)	Direction From Site
Elsinore (Glen Ivy) Fault Zone	6.8	RL-SS	5.0	7.8	SW
Elsinore Fault Zone (Temecula Section)	6.8	RL-SS	5.0	7.9	SW
Chino Fault	6.7	RL-R-O	1.0	30	NW
Whittier Fault	6.8	RL-R-O	2.5	49	NW
San Jacinto Fault (San Jacinto Valley Section)	6.9	RL-SS	12.0	12	NE
Beaumont Plain Fault Zone	--	--	--	28	ENE
Redhill-Etiwanda Avenue Fault (considered part of the Cucamonga Fault)	--	--	--	45	NNW
Cucamonga Fault	6.9	R	5.0	43	NNW
San Andreas Fault (San Bernardino Segment)	7.5	RL-SS	24.0	28	NNE

Geometry Key: BT = blind thrust, LL = left lateral, N = normal, O = oblique, R = reverse, RL = right lateral, SS = strike slip.
Source: *Geo Report*, Appendix D

The nearest known active fault to the Project site is the Elsinore (Glen Ivy segment) fault located approximately 7.8 miles to the southwest of the site. The Elsinore fault is a right-lateral, strike-slip fault, with an estimated maximum moment magnitude (Mw) earthquake of Mw 6.8 and an associated slip-rate of approximately 5.0 mm/year. The Project site could be subjected to moderate ground shaking in the event of a major earthquake on significant faults in the southern California and northern Baja California area. The *Geo Report* estimates ground shaking⁴ at the Project site could be approximately half the force of gravity (g) exerted horizontally (0.51 g).

As stated in Threshold 11, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone and there are no known active, potentially active, or inactive faults onsite or projecting toward the Project site.

Due to the lack of mapped faults across the site, ground rupture due to faulting is not a design consideration for the Project. The *Geo Report* notes that the Project site is located within an area mapped by Riverside County as having low to moderate potential for liquefaction but based on the dense to very dense nature of the very old alluvial deposits the potential for liquefaction and seismically-induced settlement at the site is not a design consideration.

Based on the results of laboratory testing conducted in conjunction with the *Geo Report*, the onsite soils do not exhibit a significant potential for collapse upon saturation. Furthermore, remedial grading (removal of undocumented fill and upper alluvium) is recommended to further reduce the potential effects of collapsible soils in the near surface layers.

CBC requirements (as implemented through Ordinance No. 457) pertaining to new development and construction will minimize the potential for structural failure or loss of life during earthquakes by ensuring that structures are constructed pursuant to applicable seismic design criteria for the region.

⁴ As referenced to the Maximum Credible Earthquake ground motion (MCE_R) for a period of 1 second

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

CBC requirements are applicable to all development; therefore, they are not considered mitigation for CEQA implementation purposes. In addition, the Project will be required to comply with recommendations provided in the *Geo Report*.

With adherence to standard conditions, any exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, will remain at a less than significant level.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

14. Landslide Risk

a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?

☐
☐
☐
☒

Source(s): *Updated Preliminary Geotechnical Interpretive Report, Proposed RV and Boat Storage, Assessor's Parcel Number 476-010-060, Located at the Intersection of Highway 79 and Keller Road*, prepared by Earth Strata Geotechnical Services, Inc., 9-14-2020 (*Geo Report Appendix E1*); *General Plan*, Chapter 6, Safety Element, Figure S-5 *Regions Underlain by Steep Slope*; and *Map My County (Appendix A)*.

Findings of Fact:

a) *Would the Project directly or indirectly be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?*

No Impact

According to the *Geo Report*, there are no mapped slope stability hazards within or adjacent to the Project site. Furthermore, slope instability was not observed during the site inspection or in conjunction with an aerial photograph review.

The *Geo Report* indicated that landslide debris was not observed during the subsurface exploration, and no ancient or recent landslides are known to exist, or have been mapped, in the vicinity of the site. Geologic mapping of the site conducted during the geotechnical investigation reveals no geomorphic expressions that indicate landsliding.

The *Geo Report* states that the probability of occurrence of ground failure related to ground shaking (including lateral spreading and collapse) depends on the severity of an earthquake, the site's distance from faults, local topography, the state of subsurface earth materials, groundwater conditions, and other related factors. It also states the potential for earthquake-induced lateral spreading beneath the proposed structures is considered very low due to the recommended compacted fill, relatively low groundwater level, and the dense nature of the deeper onsite earth materials. Based on available evidence, the *Geo Report* concluded the secondary effects of seismic activity, including lateral spreading and collapse, are considered unlikely.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

There are also no steep slopes on or adjacent to the site that could contribute to rockfalls. Finally, cut or fill slopes greater than 10 feet in height or steeper than 2:1 (horizontal:vertical) are not anticipated to be constructed as part of the Project site development plan.

Based on the above, the proposed Project site development plan will not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards. No impacts will occur.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

15. Ground Subsidence

a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in ground subsidence?

☐
☐
☒
☐

Source(s): *Updated Preliminary Geotechnical Interpretive Report, Proposed RV and Boat Storage, Assessor's Parcel Number 476-010-060, Located at the Intersection of Highway 79 and Keller Road, prepared by Earth Strata Geotechnical Services, Inc., 9-14-2020 (Geo Report **Appendix E1**); General Plan, Chapter 6, Safety Element, Figure S-7 Documented Subsidence Areas Map, (p. S-29); Map My County (**Appendix A**); and County of Riverside, Ordinance No. 457.*

Findings of Fact:

a) *Would the Project directly or indirectly be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in ground subsidence?*

Less Than Significant Impact

According to the *Geo Report*, the onsite soils are relatively low density, compressible earth materials such as topsoil and upper alluvial materials. These soils are relatively shallow (1-3 feet in depth) and overlie bedrock consisting of Mesozoic Phyllite. Onsite materials do not exhibit a potential for collapse upon saturation. Furthermore, remedial grading (removal of the undocumented fill and upper alluvium) is recommended to further reduce the potential effects of collapsible soils in the near surface layers. Oversize rock is also expected to be encountered during grading.

The Project will be required to comply with the recommendations contained within the *Geo Report*, as well as the CBC requirements which are implemented through Ordinance No. 457 pertaining to new development and construction. Meeting these requirements will minimize the potential for structural failure or loss of life during earthquakes by ensuring that structures are constructed pursuant to applicable seismic design criteria for the region.

CBC requirements are applicable to all development; therefore, they are not considered unique mitigation for. In addition, the County's development review process will require the Project to comply with the recommendations of the *Geo Report*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

With adherence to standard conditions and recommendations of the *Geo Report*, the Project will not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in ground subsidence. Any impacts will remain at a less than significant level.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

16. Other Geologic Hazards

a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?

☐
☐
☐
☒

Source(s): Site Visit by Matthew Fagan July 21, 2020; *Updated Preliminary Geotechnical Interpretive Report, Proposed RV and Boat Storage, Assessor's Parcel Number 476-010-060, Located at the Intersection of Highway 79 and Keller Road*, prepared by Earth Strata Geotechnical Services, Inc., 9-14-2020 (*Geo Report, Appendix E1*); and *Map My County (Appendix A)*.

Findings of Fact:

a) *Would the Project directly or indirectly be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?*

No Impact

Seismically induced flooding is normally a consequence of a tsunami (seismic sea wave), a seiche (i.e., a wave-like oscillation of surface water in an enclosed basin that may be initiated by a strong earthquake) or failure of a major reservoir or retention system up gradient of the site. According to the *Geo Report*, the site is at an elevation of more than 1,200 feet above mean sea level and is located more than 30 miles inland from the nearest coastline of the Pacific Ocean. Therefore, the potential for seismically induced flooding due to a tsunami is considered nonexistent. Lake Skinner is located less than 2.5 miles away to the southeast and Diamond Valley Lake is located less than 3 miles to the northeast. Although both lakes lie up gradient of the site, the likelihood of induced flooding due to a dam failure or a seiche overcoming the dam's freeboard is considered very low.

The western portion of the Project site discharges into a natural stream at the northwestern corner of the Project site. However, there are no steep slopes or large drainage channels, either natural or man-made, proximate to the Project site that could result in substantial mudflows onto the Project site. Therefore, the potential for mudflow impacting the Project site is considered very low. Finally, there are no volcanic hazards in proximity of the Project site.

Based on this information, implementation of the proposed Project would not be subject to geologic hazards, such as tsunami, or seiche. Any mudflows associated with a seiche, or volcanic hazards are not applicable to the Project. No impacts will occur.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
17. Slopes				
a) Change topography or ground surface relief features?	☐	☐	☒	☐
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	☐	☐	☒	☐
c) Result in grading that affects or negates subsurface sewage disposal systems?	☐	☐	☒	☐

Source(s): Site Visit by Matthew Fagan July 21, 2020; *Updated Preliminary Geotechnical Interpretive Report, Proposed RV and Boat Storage, Assessor's Parcel Number 476-010-060, Located at the Intersection of Highway 79 and Keller Road*, prepared by Earth Strata Geotechnical Services, Inc., 9-14-2020 (**Geo Report Appendix E1**); *Infiltration Testing for Water Quality Treatment Areas, Proposed Commercial Development, Assessor Parcel Number 476-010-060, Located on the South West Corner of Winchester Road and Keller Road, City of Winchester, Riverside County, California*, prepared by Earth Strata Geotechnical Services, Inc., 11-8-2021 (**Appendix E2**); *Onsite Wastewater Treatment System Report and Design for Onsite Water Treatment Utilizing an Advanced Treatment System (ATS), Proposed Commercial Development, Assessor Parcel Number 476-010-060, Located on the South West Corner of Winchester Road and Keller Road, City of Winchester, Riverside County, California*, prepared by Earth Strata Geotechnical Services, Inc., 8-10-2024 (**ATS Report, Appendix E3**); and County of Riverside, Ordinance No. 457.

Findings of Fact:

a) *Would the Project directly or indirectly change topography or ground surface relief features?*

Less Than Significant Impact

According to the *Geo Report*, the subject property is located southwest of the intersection of Highway 79 and Keller Road in the Winchester Area of Riverside County. The site occupies 4.66 acres of undeveloped land, and the site is relatively flat. Elevations onsite range from 1,215 to 1,230 feet above mean sea level (amsl) for a difference of about 15 feet across the entire site. Drainage generally flows to the northwest.

The Grading Plans do not specify cut and fill quantities; however, the Stockpile Plan indicates a 0.99-acre portion of the Project site is proposed to be used to stockpile 28,000 cubic yards (CY) of soil from another site at the southwest quadrant of Highway 79 (Winchester Road) and Murrieta Hot Springs Road.

Although pads will be created to support the proposed buildings, implementation of the proposed Project will not result in a significant change the site topography and ground surface relief features. Any impacts will be less than significant, and no mitigation is required.

b) *Would the Project directly or indirectly create cut or fill slopes greater than 2:1 or higher than 10 feet?*

Less Than Significant Impact

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

As set forth in the *Geo Report*, cut or fill slopes greater than 10 feet in height or steeper than 2:1 (horizontal:vertical) are not anticipated to be constructed as part of the proposed Project development plan.

CBC requirements (as implemented through Ordinance No. 457) pertaining to new development and construction will minimize the potential for structural failure or loss of life due to geological constraints by ensuring that structures are constructed pursuant to applicable seismic design criteria for the region. CBC requirements are applicable to all development; therefore, they are not considered mitigation for CEQA implementation purposes. In addition, the Project will be required to comply with recommendations provided in the *Geo Report*.

The County of Riverside Building and Safety Department has standard conditions that apply to manufactured slopes, which require that the Project applicant plant and irrigate all manufactured slopes equal to or greater than 3 feet in vertical height with drought tolerant grass or ground cover; slopes 15 feet or greater in vertical height shall also be planted with drought tolerant shrubs or trees in accordance with the requirements of Ordinance 457.

With adherence to standard conditions, any impacts will remain at a less than significant level.

c) *Would the Project directly or indirectly result in grading that affects or negates subsurface sewage disposal systems?*

Less Than Significant Impact

The Project will have limited sewage generation (i.e., restroom facilities would be limited to the office area only). Therefore, the Project is proposing an on-site Advanced Treatment System (ATS) wastewater treatment system instead of connecting to the municipal wastewater system. A single subsurface ATS tank is proposed to be located in the northwest portion of the site, adjacent to the proposed access drive from Keller Road.

With the ATS installed and Health Department approval, implementation of the proposed Project would not require, or result in, the construction of new offsite wastewater treatment facilities or expansion of existing facilities maintained by the Eastern Municipal Water District (EMWD). As previously discussed in Section 23 of this Initial Study (*Hydrology and Water Quality*), all new development in the County of Riverside is required to comply with provisions of the 2010 Santa Ana Municipal Separate Sewer Permit, as enforced by the Santa Ana Regional Water Quality Board.

Percolation testing has been performed in conjunction with the *Geo Report* and the *ATS Report* has been designed to meet the current standards of the Riverside County Department of Environmental Health and the Regional Water Quality Control Board. The *Geo Report* and *ATS Report* found no onsite soil conditions or grading restrictions that would preclude installation or successful operation of an ATS wastewater treatment system for this Project.

Based on the above, the proposed Project will result in grading that affects or negates subsurface sewage disposal systems, so impacts would be less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
18. Soils				
a) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐

Source(s): *Updated Preliminary Geotechnical Interpretive Report, Proposed RV and Boat Storage, Assessor's Parcel Number 476-010-060, Located at the Intersection of Highway 79 and Keller Road, prepared by Earth Strata Geotechnical Services, Inc., 9-14-2020 (Geo Report **Appendix E1**); Infiltration Testing for Water Quality Treatment Areas, Proposed Commercial Development, Assessor Parcel Number 476-010-060, Located on the South West Corner of Winchester Road and Keller Road, City of Winchester, Riverside County, California, prepared by Earth Strata Geotechnical Services, Inc., 11-8-2021 (**Appendix E2**); Onsite Wastewater Treatment System Report and Design for Onsite Water Treatment Utilizing an Advanced Treatment System (ATS), Proposed Commercial Development, Assessor Parcel Number 476-010-060, Located on the South West Corner of Winchester Road and Keller Road, City of Winchester, Riverside County, California, prepared by Earth Strata Geotechnical Services, Inc., 8-10-2024 (ATS Report, **Appendix E3**); Project Plans (**Appendix I**); and Map My County (**Appendix A**).*

Findings of Fact:

a) *Would the Project directly or indirectly result in substantial soil erosion or the loss of topsoil?*

Less Than Significant Impact

Soils on the property consist of fine- to medium-grained sands with silt and small to medium-sized rocks. Soils mapped on the site by the Natural Resources Conservation Service (NRCS) include Escondido fine sandy loam (EcC2); Friant fine sandy loam (FwE2); Garretson very fine sandy loam (GaC); Monserate sandy loam (MmB); and Vallecitos loam (VeC2). Permeability for these five soils ranges from very slow to moderately rapid.

Site grading will create the potential for the proposed Project to result in soil erosion or the loss of topsoil. The County of Riverside Building and Safety Department has standard conditions that apply to manufactured slopes, which require that the Project applicant plant and irrigate all manufactured slopes equal to or greater than 3 feet in vertical height with drought tolerant grass or ground cover; slopes 15 feet or greater in vertical height shall also be planted with drought tolerant shrubs or trees in accordance with the requirements of Ordinance 457.

In addition, wind erosion will be minimized through mandated soil stabilization measures by South Coast Air Quality Management District (SCAQMD) Rule 403 (Fugitive Dust), such as daily watering.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Lastly, water erosion will be prevented through the County's standard, mandated, erosion control practices required pursuant to the CBC, and the National Pollution Discharge Elimination System (NPDES), such as silt fencing, fiber rolls, or sandbags.

These standard conditions are applicable to all development; therefore, they are not considered mitigation for CEQA implementation purposes.

With adherence to standard conditions, any impacts from implementation of the proposed Project that could result in substantial soil erosion or the loss of topsoil, will remain less than significant.

b) Would the Project be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact

According to the *Geo Report*, the earth materials on the site are primarily comprised of topsoil and bedrock as described below:

- Topsoil (no map symbol): Residual topsoil, encountered in the upper 1 to 3 feet, blankets the site and underlying bedrock. These materials were noted to be generally medium brown to gray, silty sand and sandy silt which were very porous, dry and in a loose to medium dense state.
- Mesozoic Phyllite (map symbol Mzp): Phyllite was encountered beneath the topsoil in all of the subsurface excavations to the maximum depth explored. This unit was generally noted to be greenish gray to dark gray and in a dry and very hard state.

The *Geo Report* indicates onsite soil materials have a moderate potential for erosion and the Project will require a Storm Water Pollution Prevention Plan (SWPPP) with Best Management Practices (BMPs) to control potential erosion during construction. The Project also requires a Water Quality Management Plan (WQMP) with BMPs to control potential erosion during Project operation.

The *Geo Report* indicates onsite earth materials have a medium potential for expansion based on laboratory testing. The report recommended additional testing after the completion of rough grading. Consistent with Ordinance No. 457, each building pad will be evaluated for its expansive potential and foundation design parameters will be incorporated.

CBC requirements (as implemented through Ordinance No. 457) pertaining to new development and construction will minimize the potential for structural failure or loss of life during earthquakes by ensuring that structures are constructed pursuant to applicable seismic design criteria for the region. CBC requirements are applicable to all development; therefore, they are not considered mitigation for CEQA implementation purposes.

The Project could be located on moderately expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), creating risks to life or property. However, adherence to listed regulations and County ordinances will reduce potential impacts to less than significant levels and no mitigation is required.

c) Would the Project directly or indirectly have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Less than Significant Impact

The Project site Self-Storage Facility development plan is proposing the use of an on-site subsurface Advanced Treatment System (ATS) for wastewater treatment which will be located in the northwest portion of the Project adjacent to the proposed Keller Road entry into the Project. Percolation testing has been performed in conjunction with the *Geo Report* and *ATS Report* and has been designed to meet the current standards of the Riverside County Department of Environmental Health and the Regional Water Quality Control Board.

With an installed ATS that has been approved by the Health Department, any impacts are considered less than significant. No mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

19. Wind Erosion and Blowsand from Project either on or off site.

☐
☐
☒
☐

a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?

Source(s): *General Plan*, Chapter 6, Safety Element, Figure S-8 Wind Erosion Susceptibility Areas; County of Riverside, Ordinance No. 460, Article XV; and Ordinance No. 484

Findings of Fact:

a) *Would the Project directly or indirectly be impacted by or result in an increase in wind erosion and blowsand, either on or off site?*

Less Than Significant Impact

The proposed Project site is located in an area with a "Moderate Wind Eroding" rating. Implementation of the proposed Project may be impacted by or result in an increase in wind erosion and blowsand, either on or off site. All grading shall conform to the California Building Code, Ordinance 457, and all other relevant laws, rules, and regulations governing grading in Riverside County and prior to commencing any grading which includes 50 or more cubic yards, the applicant shall obtain a grading permit from the Building and Safety Department. This is a standard condition for the County of Riverside and is not considered mitigation for CEQA implementation purposes.

The Project will be required to implement a Storm Water Pollution Prevention Plan (SWPPP) to address wind erosion and blow sand during the construction process. The SWPPP is required by the California Regional Water Quality Board Order 2009-0009-DWQ and the NPDES General Permit Number CAS000002. As part of the SWPPP, the Project will implement construction BMPs per the California Stormwater Quality Association Construction BMP Handbook that are used to control wind erosion and blow sand. This is a standard condition for the County of Riverside and is not considered mitigation for CEQA implementation purposes.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

With the inclusion of these standard conditions, any impacts from implementation of the proposed Project related to an increase in wind erosion and blowsand, either on- or off-site, will remain less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

GREENHOUSE GAS EMISSIONS Would the Project:				
20. Greenhouse Gas Emissions				
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?	☐	☐	☒	☐

Source(s): *Temecula Valley Self Storage Air Quality and Greenhouse Gas Impact Study*, prepared by RK Engineering Group, Inc., 1-15-2021 (*AQ/GHG Study*, **Appendix B**); and *Temecula Valley Self Storage Noise and Air Quality*; County of Riverside, Climate Action Plan Update, November 2019; and *GHG Analysis Supplemental Letter*, prepared by RK Engineering Group, Inc., 10-9-2020 (**Appendix K**).

Note: Any tables or figures in this section are from the *AQ/GHG Study*, unless otherwise noted.

Findings of Fact:

- a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Less Than Significant

Background

Riverside County adopted its Climate Action Plan (CAP) in December 2015, and updated it in December of 2019, in an effort to reduce community-wide GHG emissions. The purpose of the CAP is to adopt a plan that is consistent with and complementary to the GHG emissions reduction efforts being conducted by the State of California through the Global Warming Solutions Act (AB 32).

The implementation mechanisms for the CAP are the Screening Tables for New Development. The Screening Tables allow new development projects a streamlined option for complying with CEQA requirements for addressing GHG emissions. Additionally, Riverside County's CAP details policies to reduce emissions from municipal and community-wide sources, including emissions from existing buildings and new development.

Projects have the option of preparing a project-specific technical analysis to quantify and mitigate GHG emissions. A threshold level above 3,000 MTCO₂e per year will be used to identify projects that require the use of Screening Tables or a project-specific technical analysis to quantify and mitigate project emissions.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

The screening tables are set up similar to a checklist, with points allocated to certain elements that reduce GHG emissions. If a project garners 100 points (by including enough GHG reducing elements), then the project is considered to be consistent with Riverside County's plan for reducing GHG emissions.

Furthermore, the Project will also be required to comply with several efficiency measures including compliance with Title 24 Part 11 of the California Building Standards Code (CALGreen) and Title 24 Part 6 (Energy Code) to further reduce energy usage and GHG emissions through building design and operation. The Project will also be required to comply with several water and waste efficiency measures consistent with building code requirements and the County's landscaping standards and waste management agreements.

Construction Emissions

Greenhouse gas emissions are estimated for on-site and off-site construction activity using CalEEMod. **Table 20-1, Construction Greenhouse Gas Emissions** shows the Project's construction-related greenhouse gas emissions, including equipment and worker vehicle emissions for all phases of construction. Construction emissions are averaged over 30 years and added to the long-term operational emissions, pursuant to SCAQMD recommendations.

**Table 20-1
Construction Greenhouse Gas Emissions**

Activity	Emissions (MTCO ₂ e/yr.) ¹		
	On-site	Off-site	Total
Site Preparation	8.43	46.35	54.78
Grading	10.51	0.53	11.04
Building Construction	267.99	135.73	403.72
Paving	14.85	1.60	16.45
Architectural Coating	2.30	1.00	3.30
Total	304.08	185.21	489.29
Amortized over 30 years²	10.14	6.17	16.31

¹ MTCO₂e/yr. = metric tons of carbon dioxide equivalents per year

² The emissions are amortized over 30 years and added to the operational emissions, pursuant to SCAQMD recommendations

Operational Emissions

Greenhouse gas emissions are estimated for on-site and off-site operational activity using CalEEMod. Greenhouse gas emissions from mobile sources, area sources and energy sources are shown in **Table 20-2, Operational Greenhouse Gas Emissions**.

**Table 20-2
Operational Greenhouse Gas Emissions**

Emission Source	GHG Emissions (MTCO ₂ e/yr.) ¹
Mobile Source	425.57
Energy Source	118.48
Area Source	0.00
Water	175.29
Waste	64.86
Construction (30-year average)	16.31
Total Annual Emissions	800.51
Riverside County CAP Screening Threshold	3,000
Exceed Tier 3 Threshold?	No

¹ MTCO₂e/yr. = metric tons of carbon dioxide equivalents per year

As shown in **Table 20-2**, the Project's GHG emissions are expected to be below the County's GHG emissions threshold of 3,000 MTCO₂e. Therefore, Project-related long-term GHG impacts are less than significant.

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

The Riverside County Climate Action Plan (CAP) establishes a threshold of significance of 3,000 MTCO₂e for land use development projects. Projects that exceed the CAP threshold may result in a potentially significant GHG impact and would require the use of Screening Tables to mitigate the project emissions. The screening tables are setup similar to a checklist, with points allocated to certain elements of the Project that would contribute to reduced greenhouse gas emissions. If a project equals or exceeds 100 points by including enough GHG reducing elements, then it is consistent with Riverside County's plan for reducing emissions. Based on the results of the quantified GHG emissions analysis, the proposed Project would not exceed the CAP threshold of significance. Although implementation of the screening tables is not required, the Project will install photovoltaic solar systems on the roofs of its buildings as required by the CAP, so the Project would be considered consistent with the CAP. Therefore, impacts are less than significant, and no mitigation is required.

In addition, the Project will also be required to comply with the mandatory requirements of Title 24 part 11 of the California Building Standards Code (CALGreen) and Title 24 Part 6 Building Efficiency Standards to further reduce energy usage and GHG emissions. CALGreen and building code

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

compliance are standard conditions of approval in the County which are considered regulatory compliance. Compliance with established regulations is not considered unique mitigation under CEQA.

By complying with the goals and policies of the CAP, the Project will also be in compliant with the broader statewide goals for combating climate change, such as those required in the CARB Scooping Plan and SB 32. The purpose of the County's CAP is to ensure compliance with the state's climate initiatives for reducing GHG emissions. Therefore, the Project will not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of greenhouse gases. Impacts are considered less than significant, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

HAZARDS AND HAZARDOUS MATERIALS Would the Project:				
16. Hazards and Hazardous Materials	☐	☐	☒	☐
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	☐	☐	☒	☐
d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?	☐	☐	☒	☐
e) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

Source(s): Project Plans (**Appendix I**); Temecula Valley Unified School District; GeoTracker website; and EnviroStor website.

Findings of Fact:

- 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

The Project proposes development of a Self-Storage Facility with paved RV Parking. The proposed Project is located at the southwest corner of Winchester Road and Keller Road. Existing land use designations proximate to the Project site are Rural Residential and Commercial Retail.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

The routine use, transport, or disposal of hazardous materials is primarily associated with industrial uses that require such materials for manufacturing operations or produce hazardous wastes as by-products of production applications. The proposed Project does not propose or facilitate any activity involving significant use, routine transport, or disposal of hazardous substances as part of the proposed commercial Self-Storage/RV Parking use.

During construction, there would be a minor level of transport, use, and disposal of hazardous materials and wastes that are typical of construction projects. This would include fuels and lubricants for construction machinery, coating materials, etc. Routine construction control measures and best management practices for hazardous materials storage, application, waste disposal, accident prevention and clean-up, etc. would be sufficient to reduce potential impacts to a less than significant level.

It is anticipated that the Storm Water Pollution Prevention Plan (SWPPP) prepared for the proposed Project can reduce such hazards to a less than significant level through best management practices (BMPs) incorporated into the SWPPP design. The County of Riverside Building and Safety Department has placed conditions of approval on the Project, as they pertain to Hazards and Hazardous Materials.

The requirement for a SWPPP is a standard condition for the County of Riverside and is not considered mitigation for CEQA implementation purposes. With the inclusion of this standard condition, any impacts from implementation of the proposed Project construction related to significant hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials, are considered less than significant.

With regard to Project operation, the proposed Self-Storage Facility and RV Parking components will not involve transport, use, storage, or disposal of substantial amounts of hazardous materials. The proposed development plan does not include any gasoline fueling stations or capabilities and the RV Parking component does not include any propane fueling or gray water dumping facilities.

It is noted, however, that it is common for small amounts of materials that may be considered hazardous to be used in conjunction with a commercial Self-Storage/RV Parking use. Widely used hazardous materials commonly used at commercial developments include cleaners and pesticides. The remnants of these and other products are disposed of as commercial hazardous waste that are prohibited or discouraged from being disposed of at local landfills.

Regular operation and cleaning of the commercial Self-Storage/RV Parking uses would not result in significant impacts involving use, storage, transport or disposal of hazardous wastes and substances.

Use of common commercial hazardous materials and their disposal does not present a substantial health risk to the community and impacts associated with the routine transport and use of these hazardous materials or wastes will be less than significant.

- 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 Impact

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

During construction, there is a potential for accidental release of petroleum products from vehicles and equipment to pose a significant hazard to people and the environment. Impacts may occur during construction; however, with the incorporation of standard conditions, such as the SWPPP and WQMP, any impacts will remain less than significant. In addition, the County has standard conditions of approval to address the disposition of wastes generated during Project construction. These standard conditions are either applicable to all development or specifically to sites that store vehicles and boats; therefore, they are not considered mitigation for CEQA implementation purposes.

Hazardous materials anticipated during operations include those most commonly associated with the proposed commercial Self-Storage/RV Parking use and on-site landscaping, which include cleaning products, petroleum products, pesticides, etc. These types of hazardous materials are not potentially hazardous to large numbers of people, especially at the scale they would be stored and used in conjunction with the Project site's proposed commercial Self-Storage/RV Parking use.

Operation of the Project would also include vehicle and boat storage which can lead to soil contamination by leaking engine and/or transmission fluids. The County has standard conditions of approval to protect onsite soils from these types of potential contaminants and are applicable specifically to sites that store vehicles and boats. Standard conditions of approval are considered regulatory compliance and not unique mitigation under CEQA.

Based on the above information, the proposed Project will not 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. Based on this information, any impacts will be less than significant.

c) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?

Less Than Significant Impact

The proposed Project is located at the southwest corner of Winchester Road and Keller Road. A limited potential exists to interfere with an emergency response or evacuation plan along Winchester Road during construction. Control of access will ensure emergency access to the site and Project area during construction through the submittal and approval of a traffic control plan (TCP). The TCP is designed to mitigate any construction circulation impacts. The TCP is a standard condition and not considered unique mitigation under CEQA.

Following construction, emergency access to the Project site and area will remain as it was prior to the proposed Project. Therefore, implementation of the Project will not impair implementation of, or physically interfere with an adopted emergency response plan or an emergency evacuation plan. Impacts will be less than significant.

d) Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?

Less Than Significant Impact

There are no existing or proposed schools located within one-quarter mile of the Project site.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

The proposed Project is in the Temecula Valley Unified School District. The surrounding area is relatively rural and the closest school to the Project site is the Harvest Hill STEAM Academy (K-8)⁵ located approximately 0.65-miles southwest of the Project site.

Based on this information, the Project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Lastly, as discussed in Thresholds 21.a, and 21.b, the Project is not anticipated to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste beyond that normally associated with a commercial Self-Storage/RV Parking facility. Impacts will remain less than significant.

- e) *Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

No Impact

The California State Waterboards GeoTracker website provides information regarding Leaking Underground Storage Tanks, Other Cleanup Sites, Land Disposal Sites, Military Sites, Waste Discharge Requirement (WDR) Sites, Permitted Underground Storage Tank (UST) Facilities, Monitoring Wells, Department of Toxic Substances Control (DTSC) Cleanup Sites and DTSC Hazardous Waste Permit Sites.

According to the GeoTracker website, there are no active Leaking Underground Storage Tanks, Other Cleanup Sites, Land Disposal Sites, Military Sites, WDR Sites, Permitted UST Facilities, Monitoring Wells, DTSC Cleanup Sites and DTSC Hazardous Waste Permit Sites on the proposed Project site, or within one (1) mile of the proposed Project site.

As shown on **Figure 21-1, Geotracker Site** and on **Figure 21-2, Envirostor Site** one case related to the Harvest Hill STEAM Academy is noted within the one (1) mile radius.

According to the DTSC EnviroStor website, the Harvest Hill STEAM Academy site was under review for concerns about possible lead contamination prior to the school being built. A Phase I Environmental Assessment was prepared for that site and DTSC approved the Phase I with a No Further Action determination in January of 2012. Finally, the Project site is not listed on the official state Cortese List as required under Government Code Section 65962.5.

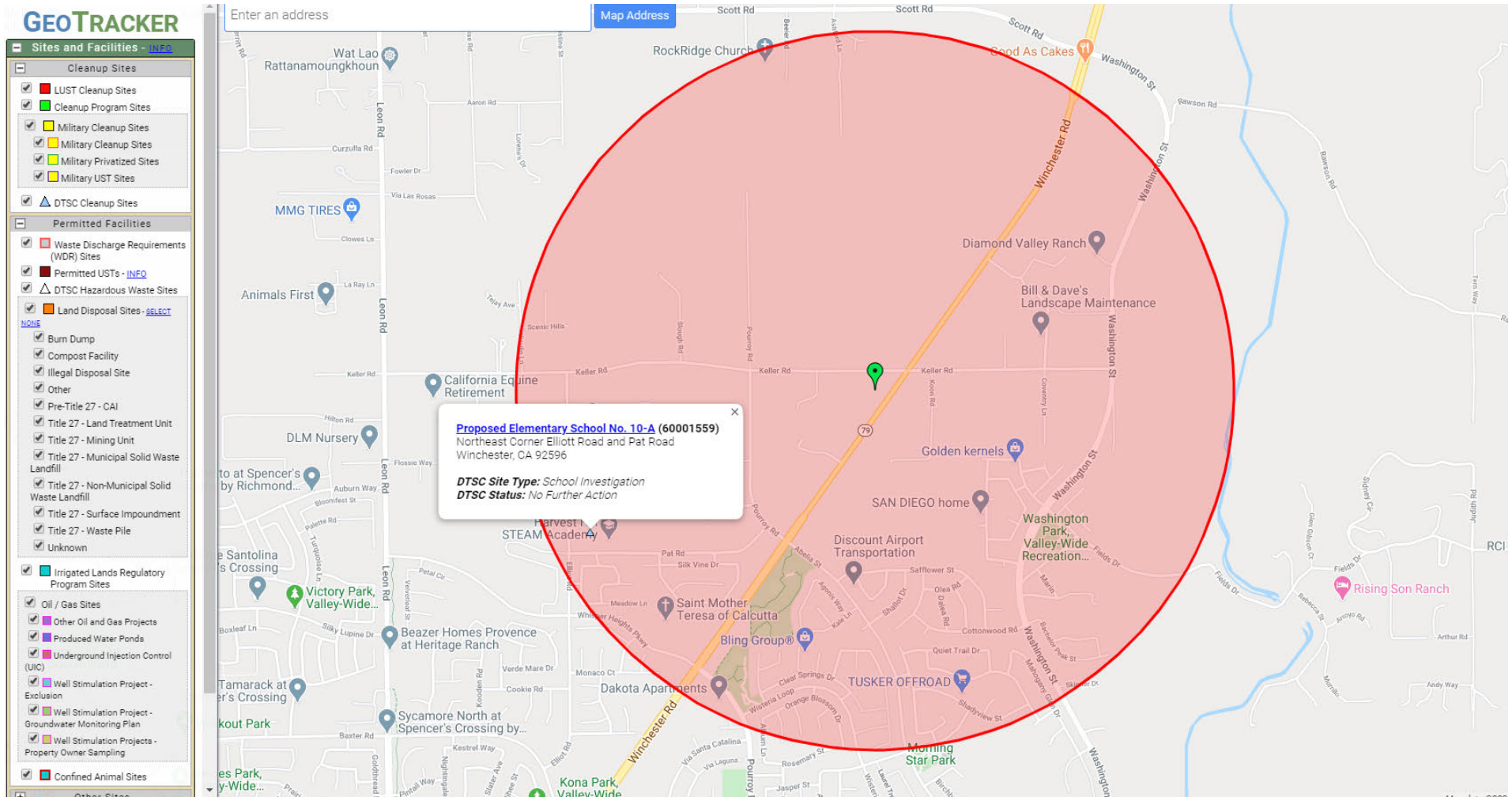
Based on the above, the Project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Furthermore, there is no evidence that hazardous wastes or contamination would be present on the Project site. No impacts will occur.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

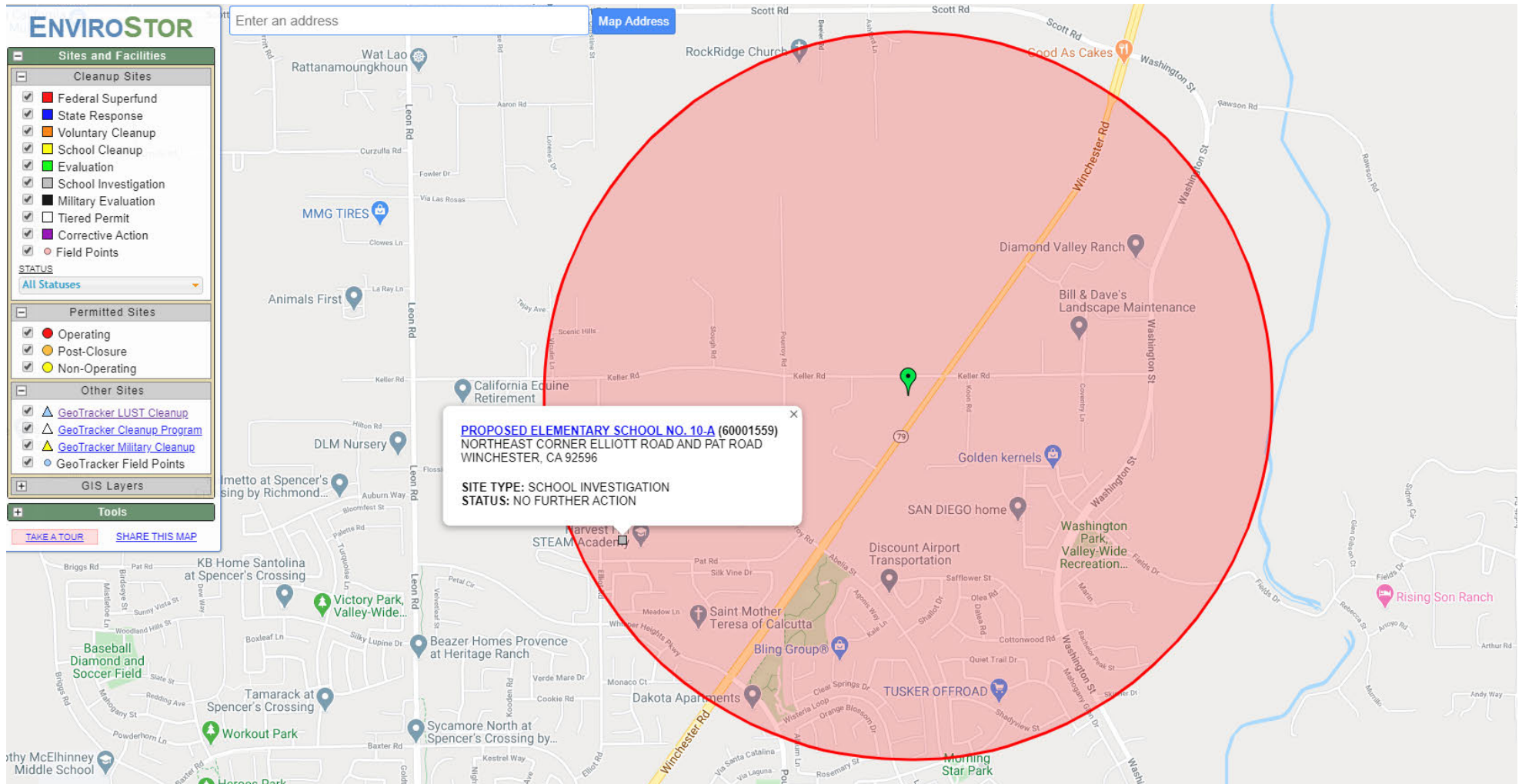
⁵ This school is actually within the Menifee Union School District as the Project site is close to the boundary of the districts.

**FIGURE 21-1
GeoTracker Site**



Source: GeoTracker <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=french+valley%2C+ca>

FIGURE 21-2
Envirostor Site



Source: Envirostor <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=french+valley%2C+ca>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
17. Airports				
a) Result in an inconsistency with an Airport Master Plan?	☐	☐	☐	☒
b) Require review by the Airport Land Use Commission?	☐	☐	☐	☒
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?	☐	☐	☐	☒
d) For a project within the vicinity of a private airstrip, or heliport, would the Project result in a safety hazard for people residing or working in the Project area?	☐	☐	☐	☒

Source(s): *General Plan*, Chapter 6, Safety Element, Figure S-20 *Airport Locations*, (p. S-76); Riverside County Airport Land Use Compatibility Plan Policy Document, April 2010; and *Map My County (Appendix A)*.

Findings of Fact:

a) *Would the Project result in an inconsistency with an Airport Master Plan?*

No Impact

The Project site is not located in an area which is governed by an airport master plan. The closest airport is the French Valley Airport, which is located approximately 3.4 miles south-southwest of the Project site. Therefore, implementation of the proposed Project would not result in an inconsistency with an Airport Master Plan. No impacts will occur.

b) *Would the Project require review by the Airport Land Use Commission?*

No Impact

Please reference the discussion under Threshold 22.a. The Project site is not located in an area which is governed by an airport land use plan; therefore, review by an airport land use commission is not required. This criterion is not applicable to the Project. No impacts will occur.

c) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?*

No Impact

Please reference the discussion under Threshold 22.a. There are no private airstrips in the vicinity of the Project site. Therefore, this criterion is not applicable to the Project. No impacts will occur.

d) *For a project within the vicinity of a private airstrip, or heliport, would the Project result in a safety hazard for people residing or working in the Project area?*

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

No Impact

Please reference the discussion under Thresholds 22.a and c. There are no heliports in the vicinity of the Project site. Therefore, this criterion is not applicable to the Project. No impacts will occur.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

HYDROLOGY AND WATER QUALITY Would the Project:				
7. Water Quality Impacts	☐	☐	☒	☐
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?	☐	☐	☒	☐
d) Result in substantial erosion or siltation on-site or off-site?	☐	☐	☒	☐
e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	☐	☐	☒	☐
f) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
g) Impede or redirect flood flows?	☐	☐	☒	☐
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to Project inundation?	☐	☐	☒	☐
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Source(s): *Temecula Valley Self-Storage Project*, prepared by Specialized Utilities Services Program (SUSP) Engineering, 5-2024, with *Preliminary Technical Report (PTR) with State Resources Control Board, Division of Drinking Water Preliminary Review 6-19-2024 (Appendix M)*; *Project Specific Water Quality Management Plan, Temecula Valley Self-Storage*, prepared by The Prizm Group, 6-15-2022 (*WQMP, Appendix G1*); *Temecula Valley Mini Storage CUP 190012 SWC Keller Road and Winchester Road, Preliminary Hydrology Analysis*, prepared by The Prizm Group, 4-7-2022 (*Hydro Study, Appendix G2*); *Geotechnical Interpretive Report Proposed RV and Boat Storage*, prepared by Earth Strata Geotechnical Services, Inc., 9-14-2020 (*Geo Investigation*,

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Appendix E1); *Infiltration Testing for Water Quality Treatment Areas, Proposed Commercial Development, Assessor Parcel Number 476-010-060, Located on the South West Corner of Winchester Road and Keller Road, City of Winchester, Riverside County, California*, prepared by Earth Strata Geotechnical Services, Inc., 11-8-2021 (*Infiltration Study*, **Appendix E2**); SAN 53 – EMWD Will Serve Letter for WS20230000929 - APN: 476-010-060, prepared by EMWD, 8-15-2023 (**Appendix L**); *Onsite Wastewater Treatment System Report and Design for Onsite Water Treatment Utilizing an Advanced Treatment System (ATS)*, prepared by Earth Strata Geotechnical Services, Inc., 8-10-20243 (*ATS Report*, **Appendix E3**); Eastern Municipal Water District 2020 *Urban Water Management Plan* (EMWD 2020 UWMP); Metropolitan Water District 2020 *Urban Water Management Plan* (2020 RUWMP); Ordinance No. 458 (An Ordinance of the County of Riverside Regulating Special Flood Hazard Areas and Implementing the National Flood Insurance Program); Riverside County General Plan, Safety Element, Figure 4, *Flood Hazard Areas*, and Figure 5, *Dam Failure Inundation Zone*; Riverside County General Plan; FEMA Website; and *Map My County* (**Appendix A**).

Note: Any tables or figures in this section are from the *WQMP* or *Hydro Study*, unless otherwise noted.

Findings of Fact:

- a) *Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Less Than Significant Impact

The federal Clean Water Act (CWA) establishes the framework for regulating municipal storm water discharges (construction and operational impacts) via the National Pollutant Discharge Elimination System (NPDES) program. A project would have an impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Water Code Section 13050, or that cause regulatory standards to be violated as defined in the applicable NPDES storm water permit or Water Quality Control Plan for a receiving water body.

For the purpose of this specific issue, a significant impact could occur if the Project would discharge water that does not meet the quality standards of the agencies which regulate surface water quality and water discharge into storm water drainage systems. Significant impacts could also occur if the project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include preparation of a Water Quality Management Plan (WQMP) to reduce potential post-construction water quality impacts. A detailed *WQMP* was prepared for this Project by The Prizm Group dated 6-15-2022.

The Project site is located in the Santa Margarita Region Watershed and encompasses an area of approximately 750 square miles, most of which (±550 sq. mi; 73%) is located in Southwest Riverside County and the balance (±200 sq. mi; 27%) located in northern San Diego County. The Santa Margarita Watershed basin includes the Riverside County areas of Temecula, Murrieta, Wildomar, and a small portion of southern Menifee, while the areas within San Diego County include Fallbrook and Camp Pendleton.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

The Project site drains toward Warm Springs Creek to the south which extends approximately 8.2 miles westerly (generally) of the Project site to its confluence with Murrieta Creek, just west of Interstate 15 (I-15). From there, storm water flows south/southeast approximately 7.3 miles within Murrieta Creek along the eastern foothills of the Santa Ana Mountains to the Santa Margarita River, through the Santa Ana Mountain Range (aka the “Rainbow Gap”) and Camp Pendleton before discharging into the Pacific Ocean. Runoff from the Project site can affect the water quality of four distinct receiving bodies of water. **Table 23-1, Local Receiving Bodies and Pollutants of Concern** shows the four downstream receiving bodies and the various pollutant(s) or contaminant(s) that contribute most to their classification by the U.S. Environmental Protection Agency (EPA) as “impaired water bodies” under Section 303(d) of the federal Clean Water Act. For the proposed Project, the primary pollutants of concern are nutrients, pesticides, organics, sediments, trash/debris, and oil/grease.

**Table 23-1
Local Receiving Bodies and Pollutants of Concern**

Receiving Waters	EPA Approved 303(d) List Impairments ¹
Warm Springs Creek	Nutrients, Metals, Bacteria & Pathogens, Pesticides & Herbicides
Murrieta Creek	Nutrients, Metals, Toxicity, Pesticides & Herbicides
Santa Margarita River (Upper)	Nutrients, Toxicity
Santa Margarita River (Lower)	Nutrients, Bacteria and Pathogens

¹ Nutrients include nitrogen, phosphorus and eutrophic conditions. Metals includes copper, iron, and manganese.

All new development in the County of Riverside is required to comply with provisions of the NPDES program, including Waste Discharge Requirements (WDR), and the 2013 Santa Margarita MS4 Permit (amended 2015), as enforced by the San Diego Regional Water Quality Board (SDRWQCB). It should be noted that due to the physical constraints on and adjacent to the site, the drainage plan and water quality improvements to the site are integral to each other. The *WQMP* indicates the Project will require subsequent regulatory approval from the SDRWQCB under the Statewide Construction General Permit.

The site has not been graded and is relatively flat, with elevations ranging from approximately 1,413 feet to 1,428 feet above mean sea level (amsl) for a change of about 15 feet across the entire site. Onsite drainage currently flows to the south and southeast toward Highway 79.

The proposed Project is a privately owned public storage facility located at the southwest corner of Keller Road and Highway 79. Stormwater will be filtered through a “BioClean Modular Wetland System”, routed through the underground detention chambers and ultimately released offsite into the existing drainage course on the west side of the site. The biofiltration system has a design capture volume of 3,280 sf. All flows will exit the detention facilities through a controlled outlet to control flows. Runoff is then piped to a headwall that outlets at the south end of the site.

Project improvements include constructing storage buildings, an RV storage area, and street improvements on both Keller Road and Highway 79. Keller Road improvements will be mitigated by installing pipe inlets in the curb to intercept low flows and direct them into self-retaining landscape areas behind the sidewalk. The site occupies 4.6 acres and over 80 percent of the site will be covered by impervious surfaces. The layout of proposed water quality improvements for the Project is shown in **Figure 23-1, WQMP Site Plan**, and summarized in **Table 23-2, Onsite Drainage Management Areas**.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

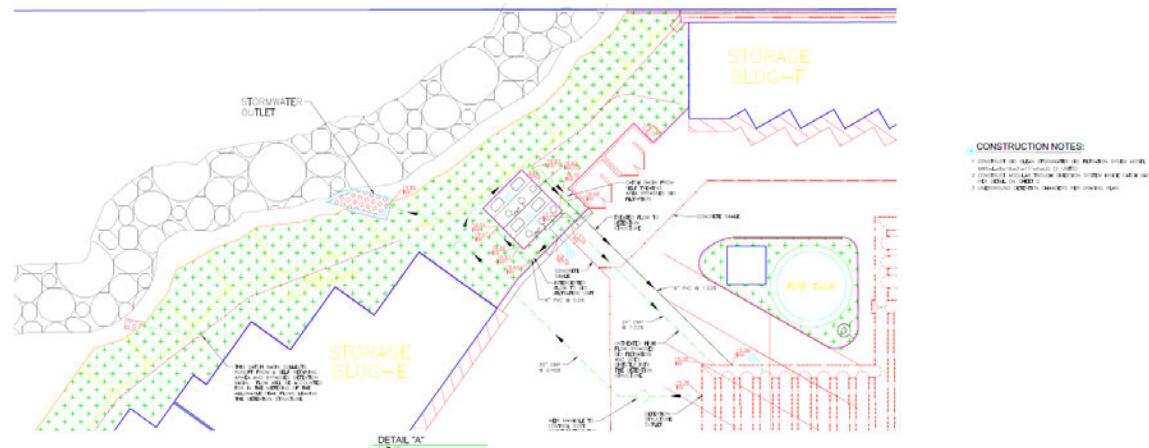
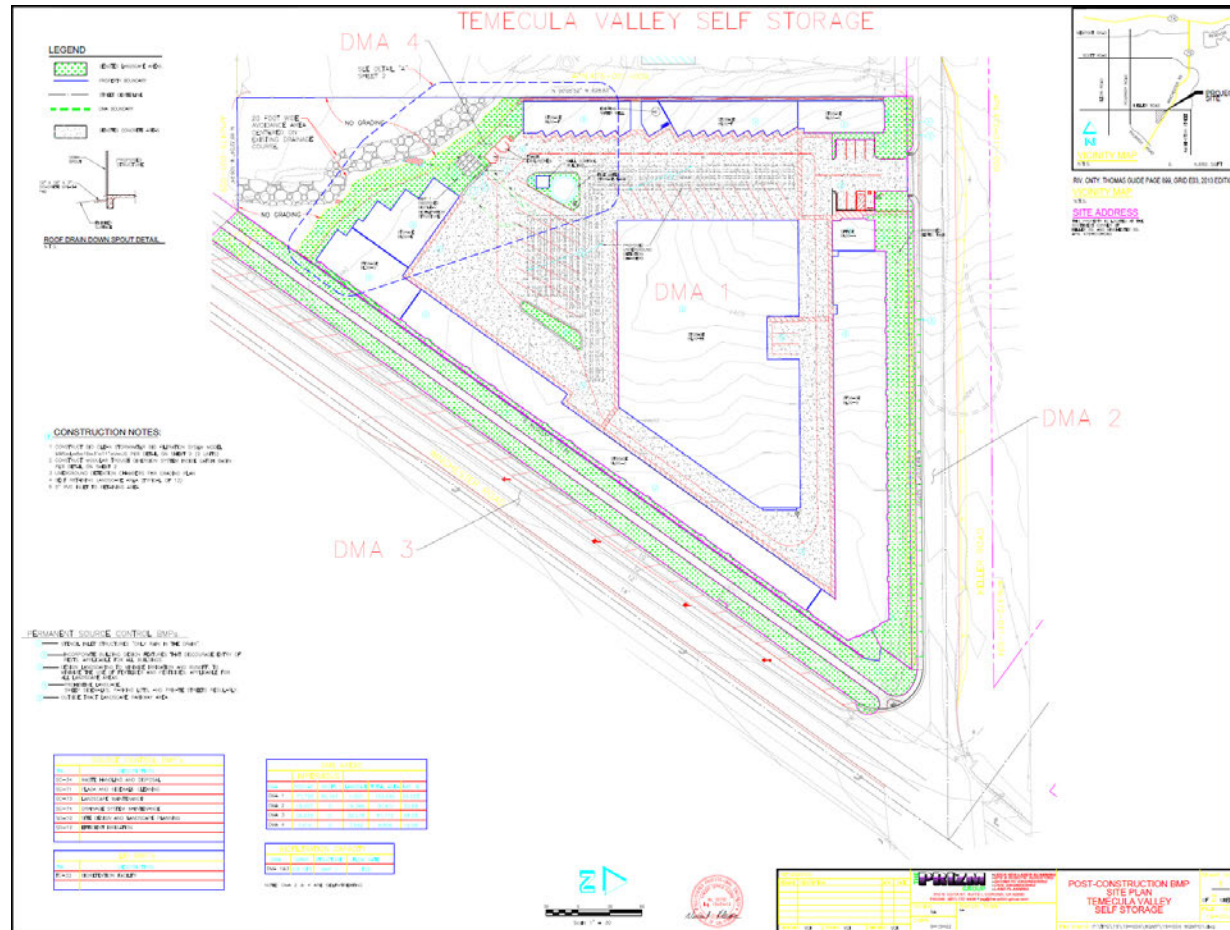
**Table 23-2
Onsite Drainage Management Areas**

DMA¹	Surface Type	Area (sf)	Planned Water Quality Improvements
D-1	Impervious	163,490	Drains to BMP-1 (BioClean Biofiltration System) ²
B-2	Pervious	14,394	Self-retaining area with planter
C-2	Pervious	16,007	Asphalt and concrete drains to DMA B-2
D-3	Mixed	81,712	Drains to BMP-1 (BioClean Biofiltration System) ²
A-4	Mixed	8,956	Native plants and rock mulch with drip irrigation if needed
Total	--	284,559	

¹ see Figure 23-1

² biofiltration only - no infiltration

**FIGURE 23-1
WQMP Site Plan**



Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

The *WQMP* recommends a number of Best Management Practices (BMPs) to reduce runoff and help protect downstream water quality. Although the site will largely be covered by impervious surfaces, Runoff is directed from impervious areas to adjacent landscaping areas, and landscaping plan specifies native or drought tolerant species to reduce the overall demands for potable water use associated with irrigation.

Since the Project involves more than one acre of ground disturbance, it is subject to NPDES permit requirements for the preparation and implementation of a project-specific Storm Water Pollution Prevention Plan (SWPPP). Adherence to NPDES permit requirements and the measures established in the SWPPP are routine actions conditioned by the County and will ensure applicable water quality standards are appropriately maintained during construction of the proposed Project.

The proposed Project has been reviewed and conditioned by the Riverside County Flood Control & Water Conservation District, the County Building Department, and the County Transportation Department, to mitigate any potential impacts as listed above through site design, preparation of the WQMP, and adherence to the requirements of the NPDES. These are standards conditions for the County of Riverside and are not considered mitigation for CEQA implementation purposes. At Project completion, the Project site will be covered with commercial and storage structures, asphalt paved access drives and automobile parking areas, and landscaping. This will also ensure that there will be no erosion or siltation on- or off-site.

Therefore, the proposed Project will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Any impacts will be less than significant.

b) *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 with Mitigation Incorporated

The Project site is located within the water service boundary of the EMWD. The closest EMWD water service line is located approximately 0.33-mile southeast of the Project site (at the intersection of Woodshire Drive and Koon Street) with a second water service line located approximately 0.39-mile southwest of the Project site (at the intersection of Pourroy Road and Ruft Road). Due to the fact that the storage facility restrooms are open to the public utilizing the facility and there could potentially be more than 25 people daily that have access to the restrooms, the facility is classified as a public water system, specifically, a transient non-community water system; therefore, the applicant must install a privately owned public water system (PWS) with a commercial well. In May 2024, a *Preliminary Technical Report (PTR)* was prepared and submitted to the State Water Resources Control Board, Division of Drinking Water, for a new commercial well in the west-central portion of the site. On June 19, 2024, the State completed its preliminary review and directed the applicant’s engineer to submit formal plans and specification for the PWS to them for review. The State indicated their letter did not imply approval of the water system and all application materials had to first be submitted, reviewed, and approved by the Riverside County Department of Environmental Health prior to receiving a domestic water supply permit to operate a public water system. It should be noted that the Project site currently has an existing domestic water supply well which will not be connected to the new water system. The existing well will not be used as an additional source to the proposed system as it does not comply with the County required 50 foot boundary setback and lacks the State required 50 foot sanitary seal.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

The *PTR* indicates the new potable water system infrastructure will include a new 5,000-gallon community well, storage tank, booster pump, two hydro-pneumatic tanks, chlorine system, and distribution pipelines. No existing facilities or structures will be included in the new potable water system. The well will also supply landscape irrigation and fire protection systems. The well will have a depth of 260 feet with a minimum sanitary seal depth of 50 feet, a minimum 50-foot setback from property lines, and a minimum 100 feet clearance from any sewer leach lines, as required. The proposed new well will satisfy Title 22 capacity requirements and its design, operation, and maintenance will need to be coordinated with EMWD as part of its overall groundwater management responsibilities for the region.

Assuming the new well is approved, the Project does not propose to connect to the existing EMWD water supply system per the *PTR*. **Mitigation Measure MM-HYD-1** is included to assure the well is permitted and active prior to occupancy of the Project. It should also be noted that the Project’s proposed Self Storage Facility use requires significantly less water in comparison with more traditional commercial retail and office uses of similar size.

Approximately 20 percent of EMWD’s potable (drinking) water demand is supplied by EMWD groundwater wells. The majority of the groundwater produced by EMWD comes from its wells in the Hemet and San Jacinto area. Some of these wells have limited production as a result of the Fruitvale Judgment and Decree. EMWD also has wells in the Moreno Valley, Perris Valley and Murrieta areas. Groundwater basins may be defined by geologic structures, such as earthquake faults or fault zones, or they may be defined by administrative boundaries based on water quality or other factors. Groundwater flow follows a path of least resistance (i.e., groundwater level gradient) to a point of equilibrium. EMWD’s “Groundwater Reliability Plan” outlines their groundwater management program to ensure for long-term groundwater sustainability.

The Project *Infiltration Study* determined that the onsite infiltration rates (4 test locations) were 0.0 inches per hour (in/hr) due to the presence of underlying hard compacted clay and bedrock materials.

As outlined above, the Project will design, install, and operate a new PWS under the regulatory oversight of the State, County, and EMWD. No other component of the proposed Project will utilize or deplete groundwater supplies. Runoff on the Project site does not currently percolate back into the local groundwater as a result of underlying impervious soils. The Project design, as depicted on the Project plans and in the *WQMP* (see **Figure 23-1**) will not change existing onsite conditions although some runoff directed to the drainage channel at the northeast corner of the site may eventually percolate back into the ground at some point downstream (e.g., Warm Springs Creek). This will offset any impacts from the other non-pervious elements contained in the proposed Project.

Therefore, implementation of the proposed Project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted). Any impacts are considered less than significant, and no mitigation is required.

- 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?*

Less Than Significant Impact

As described in Threshold 23.a, the site is relatively flat and onsite drainage currently sheet flows to the northeast toward a small unnamed drainage channel. The Project *WQMP* divides the site into five drainage management areas and indicates the site occupies 3.6 acres and over 80 percent of the site will be covered with impervious surfaces.

The Project *Hydro Study* indicates runoff in the developed condition will incrementally increase over the existing undeveloped or pre-project condition, as shown in **Table 23-3, Site Runoff Condition**, due to the addition of impervious surfaces. Runoff will be collected within each of the five drainage management areas and routed through the underground detention chambers and ultimately released offsite into the existing drainage course on the west side of the site. The biofiltration system has a design capture volume of 3,280 sf. All flows will exit the detention facilities through a controlled outlet to control flows. Runoff is then piped to a headwall that outlets at the south end of the site.

**Table 23-3
Site Runoff Conditions**

Storm Event	Undeveloped Condition (Q cfs)	Developed Condition (Q cfs)	Change (cfs)
2-Year	2.38	3.87	+1.49
5-Year	3.45	5.10	+1.65
10-Year	5.28	6.14	+0.86
100-Year	9.05	9.27	+0.22

The *WQMP* indicates that stormwater runoff will be filtered through a biofiltration system then routed through the underground detention chambers and ultimately released offsite into the existing drainage channel along the west side of the site. Site improvements include installing pipe inlets in the curb to intercept low flows and direct them into self-retaining landscape areas behind the sidewalks. The *WQMP* indicates the 24-hour 85th percentile storm depth for the Project is 0.80 inches which will be accommodated onsite in the underground chambers. Runoff is carried downstream and eventually reaches Warm Springs Creek in Murrieta to the southwest.

The proposed storm drain and water quality infrastructure system proposed for the Project meet the requirements and criteria established by the County of Riverside. This infrastructure will provide flood control protection for the Project site and proposed street improvements. Moreover, the storm drain and water quality system will provide the necessary Best Management Practices to treat the runoff generated by the Project in a manner that meet the requirements outlined in the Water Quality Management Plan Guidance Document as outlined in Threshold 23.a.

After development the drainage pattern will remain essentially the same as in the pre-Project condition (i.e., from north to south-southwest).

The proposed Project has been reviewed and conditioned by the Riverside County Flood Control and Water Conservation District (RCFCWCD), the County Building Department, and the County Transportation Department, to mitigate any potential impacts as listed above through site design and the preparation of a WQMP and adherence to the requirements of the NPDES. These are standards conditions for the County of Riverside and are not considered mitigation for CEQA implementation purposes. At Project completion, the Project site will be covered with structures,

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

parking and vehicle travelways, and landscaping. This will also ensure that there will be no erosion or siltation on- or off-site.

The Project will not 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. Any impacts will be less than significant.

d) *Result in substantial erosion or siltation on-site or off-site?*

Less Than Significant Impact

Short-Term Impacts. The Project site clearing and grading phases would disturb surface soils, potentially resulting in erosion and sedimentation. If left exposed and with no vegetative cover, the Project site’s bare soil would be subject to wind and water erosion. Since the Project involves more than one acre of ground disturbance, it is subject to NPDES permit requirements for the preparation and implementation of a Project-specific SWPPP. Adherence to NPDES permit requirements and the measures established in the SWPPP are routine actions conditioned by the County and will ensure applicable water quality standards are appropriately maintained during construction of the proposed Project. Such actions are considered regulatory compliance and not unique mitigation under CEQA.

Long-Term Impacts. As described in Thresholds 23.a and 23.c, the site is relatively flat and onsite drainage currently sheet flows to the northeast toward a small unnamed drainage channel. The Project *WQMP* divides the site into five drainage management areas and indicates the site occupies 4.6 acres and over 80 percent of the site will be covered by impervious surfaces. Stormwater will be filtered through a biofiltration system then routed through two underground detention chambers and ultimately released offsite into the existing drainage channel along the west side of the site. Site improvements include installing pipe inlets in the curb to intercept low flows and direct them into self-retaining landscape areas behind the sidewalks. The *WQMP* indicates the 24-hour 85th percentile storm depth for the Project is 0.80 inches which will be accommodated onsite in the underground chambers. The *WQMP* demonstrates the Project will not increase offsite flows and covering of the site will eliminate the long-term potential for erosion to occur either onsite or downstream offsite.

The proposed Project has been reviewed and conditioned by the RCFC&WCD, the County Building Department, and the County Transportation Department, to mitigate any potential impacts as listed above through site design and the preparation of a WQMP and adherence to the requirements of the NPDES. These are standards conditions for the County of Riverside and are not considered mitigation for CEQA implementation purposes. At Project completion, the Project site will be covered with commercial and storage structures, asphalt paved access drives and automobile parking areas, landscaping, and a drainage system that includes two bioretention systems and two subsurface detention basins. This will also ensure that there will be no erosion or siltation on- or off-site.

Based on this analysis, the Project will not result in substantial erosion or siltation on-site or off-site. Any impacts will be less than significant, and no mitigation is required.

e) *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?*

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Less Than Significant Impact

The FEMA Flood Rate Insurance Map (FIRM), Panel No. 06065C2090G, dated August 27, 2008, indicates the Project site is in Zone D which is “an area with possible but undetermined flood hazards. No flood hazard analysis has been conducted. Flood insurance rates are commensurate with the uncertainty of the flood risk” (FEMA National Flood Hazard Layer – NFHL Viewer)⁶. According to the Riverside County General Plan, Safety Element, Figure 4, the Project site is shown as not being in a 100-year or 500-year flood zone.

As demonstrated by the Project *Hydro Study*, the *WQMP*, and the discussion in Thresholds 23.a and 23.c, the Project has been designed such that no substantial surface runoff would occur. The Project will not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site. Therefore, any impacts from implementation of the Project will be less than significant and no mitigation is required.

- f) *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

Less Than Significant Impact

A detailed description of the post-Project storm drain system design is included in Threshold 23.b, herein. **Figure 23-1, *WQMP Site Plan***, identifies the proposed on-site drainage system for the Project site. The Project site has been divided into five (5) drainage management areas for design purposes. The site occupies 4.6 acres and over 80 percent of the site will be covered by impervious surfaces. Stormwater will be collected in the drainage management areas via curbs, gutters, and improved topography and directed to underground biofiltration units. Runoff will then be routed through two underground detention chambers and ultimately be released offsite into the existing drainage channel along the west side of the site. Site improvements include installing pipe inlets in the curbs to intercept low flows and direct them into self-retaining landscape areas behind the sidewalks. The *WQMP* indicates the 24-hour 85th percentile storm depth for the Project is 0.80 inches which will be accommodated onsite in the underground chambers. The *Hydro Study* and the *WQMP* demonstrate the proposed subsurface detention basins have adequate capacity to convey the expected 100-year peak flow from the site. The onsite flows will be discharged into the existing drainage channel traversing the west side of the site. All of these facilities shall meet County requirements to capture and manage the discharge of surface runoff without any substantial change in the rate or amount.

The proposed Project has been reviewed and conditioned by the RCFC&WCD, County Building Department, and County Transportation Department, to mitigate any potential impacts as listed above through site design and the preparation of a *WQMP* and adherence to the requirements of the NPDES.

These are standard conditions for the County of Riverside and are not considered mitigation for CEQA implementation purposes. With the inclusion of these standard conditions, any impacts from implementation of the proposed Project that would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, will be less than significant and no mitigation is required.

⁶ <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

g) Impede or redirect flood flows?

Less Than Significant Impact

The FEMA Flood Rate Insurance Map (FIRM), Panel No. 06065C2090G, dated August 27, 2008, indicates the Project site is in Zone D which is “an area with possible but undetermined flood hazards. No flood hazard analysis has been conducted. Flood insurance rates are commensurate with the uncertainty of the flood risk” (FEMA National Flood Hazard Layer – NFHL Viewer). According to the Riverside County General Plan, Safety Element, Figure 4, the Project site is shown as not being in a 100-year or 500-year flood zone. Therefore, flooding hazards on the site are considered minimal.

Finally, the Project has been designed to prevent any significant increase in downstream (offsite) drainage and its improvements would not impede or redirect flows. Any impacts will be less than significant.

h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to Project inundation?

Less Than Significant Impact

As outlined in Threshold 23.g, the FEMA Flood Rate Insurance Map (FIRM), Panel No. 06065C2090G, dated August 27, 2008, indicates the Project site is in FEMA Zone D which is “an area with possible but undetermined flood hazards. No flood hazard analysis has been conducted. Flood insurance rates are commensurate with the uncertainty of the flood risk”. In addition, the Riverside County General Plan, Safety Element, Figure 4, indicates the Project site is not in a 100-year or 500-year flood zone. Therefore, flooding hazards on the site are considered to be less than significant.

The Project site is located over 30 miles inland from the nearest coastline (Pacific Ocean) and separated from the ocean by the Santa Ana Mountains. The threat of tsunami is not applicable and is not a design consideration.

The Project site is located approximately 3 miles southwest and downstream of Diamond Valley Lake (DVL), the largest man-made body of water in southern California. A seiche is a run-up of water within an enclosed body of water like a lake or bay which is triggered by an earthquake or landslide-induced ground displacement. the Project site is within the mapped dam inundation area of DVL. If one or more of the three DVL dams were to fail, the Project site could be inundated depending on how much water was actually released. While the impacts of such a failure are substantial, the likelihood of occurrence is very small, so the overall risk is considered less than significant. In addition, the City of Menifee General Plan EIR states the following:

...”At capacity fill, the three dams that impound the reservoir were each designed to withstand an earthquake of 7.5 magnitude along the San Jacinto Fault or an earthquake of 8.0 magnitude along the San Andreas Fault.”

“Additionally, the Metropolitan Water District of Southern California carries out continuous automated monitoring of the dams and their foundations for deformation due to the weight of the dams, water pressure, and the effects of wetting of dam materials. The design and construction

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

of the dams for earthquake resistance, in combination with monitoring of the dams, reduce risks of dam failure due to earthquakes.”

In summary, the Project site development area is not located within a flood hazard, tsunami, or seiche zone, so these criteria are not applicable to the Project site. Impacts will be less than significant, and no mitigation is required.

- i) *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Less Than Significant Impact

Water Quality Control Plan. The Project *WQMP* has been prepared specifically to comply with the requirements of the County of Riverside for the County of Riverside Stormwater/Urban Runoff Management and Discharge Controls Ordinance, which includes the requirement for the preparation and implementation of a Project-Specific *WQMP*, Order No. R8-2010-0033.

The Project site is located in the Santa Margarita River Watershed, within the jurisdiction of the San Diego Regional Board, where discharges from Riverside County’s Phase I MS4s are regulated through the Riverside County MS4 Permit (Order No. R8-2010-0033 NPDES No. CAS618033, as amended by Order No. R8-2013-0024) pursuant to section 402(p) of the Federal Clean Water Act.

Groundwater Management. The Project site is located within the water service boundary of the EMWD. Approximately 20 percent of EMWD’s potable (drinking) water demand is supplied by EMWD groundwater wells. The majority of the groundwater produced by EMWD comes from its wells in the Hemet and San Jacinto area. Some of these wells have limited production as a result of the Fruitvale Judgment and Decree. EMWD also has wells in the Moreno Valley, Perris Valley and Murrieta areas. Groundwater basins may be defined by geologic structures, such as earthquake faults or fault zones, or they may be defined by administrative boundaries based on water quality or other factors. Groundwater flow follows a path of least resistance (i.e., groundwater level gradient) to a point of equilibrium. EMWD’s Groundwater Reliability Plus outlines their groundwater management program to ensure for long-term groundwater sustainability.

Runoff from the Project site currently flows off the site to the south but does not appreciably percolate onsite due to the presence of subsurface clay soils. The Project site would not substantially change existing conditions, so it would not have any significant impacts on local groundwater supplies which are not adjudicated at this time. However, EMWD does have an Urban Water Management Plan (*2020 UWMP*) and a third of its water comes from local groundwater. The *UWMP* is based on adopted land uses of the jurisdictions within its plan, and the proposed Project does not propose a General Plan Amendment or Zone Change. The Project is consistent with land uses planned by the County for this site, so it is consistent with the *UWMP*.

With adherence to and implementation of the conclusions and recommendations set forth in the *WQMP*, the Project site development plan will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Any impacts will be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

Mitigation:

MM-HYD-1 Prior to the issuance of a certificate of occupancy, the applicant shall install a new commercial well in the west-central portion of the property. This well must be approved and permitted by the State Division of Drinking Water and the Riverside County Department of Environmental Health (domestic water supply permit) to operate the proposed new privately owned public water system. The design, construction, and operation of the new well must also be coordinated with the Eastern Municipal Water District as part of its overall regional groundwater management responsibilities. This measure shall be implemented to the satisfaction of the County Planning Department in consultation with the County Department of Environmental Health.

Monitoring: This measure will be monitored by County Planning prior to occupancy of the Project.

LAND USE AND PLANNING Would the Project:				
24. Land Use				
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?	☐	☐	☐	☒

Source(s): *General Plan; Map My County (Appendix A); Project Plans (Appendix I); Ordinance No. 348 (Providing for Land Use Planning and Zoning Regulations and Related Functions of the County of Riverside); Ordinance No. 460 (Subdivision Regulations); and Google Maps.*

Findings of Fact:

a) *Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?*

No Impact

The Project site has a land use designation and zoning classification of Commercial. Parcels surrounding the site include both vacant and developed land zoned for commercial and residential uses. The Project is proposing commercial uses and is consistent and compatible with the existing and proposed surrounding land uses and zoning and will not divide an established community.

Lastly, the Project does not propose construction of any roadway, permanent flood control channel, or other structure that will physically divide any portion of the community. No impacts will occur.

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?*

Less Than Significant Impact

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

The Project site has a land use designation and zoning classification of General Commercial (C-1/C-P). The Project is a self-storage project which is consistent with the site's existing land use and zoning (with the approval of a Conditional Use Permit). There is no proposed change to the land use or zoning.

Based on this information, implementation of the Project will not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Any impacts will be less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

MINERAL RESOURCES Would the Project:				
25. Mineral Resources				
a) Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?	☐	☐	☐	☒

Source(s): *General Plan, Multipurpose Open Space Element*, Figure OS-6, "Mineral Resources Area" (p. OS-41); *Map My County (Appendix A)*; Mindat.org (Mineral Data Base, Riverside County); and Project Site Visit – June 26, 2020, by Matthew Fagan.

Findings of Fact:

- a) *Would the Project result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?*

No Impact

The State Mining and Geology Board (SMGB) has established Mineral Resources Zones (MRZ) using the following classifications:

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

As shown on Riverside County General Plan, *Multipurpose Open Space Element*, Figure OS-6, "Mineral Resources Area," the Project site is designated MRZ-3a (areas where the available

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposits is undetermined). The Project site has not been used for mining. The Project will include commercial uses in an area which is experiencing suburban patterns of growth. Therefore, the Project is not expected to result in the loss of availability of a known mineral resource in an area classified or designated by the State that would be of value to the region or the residents of the State. There will be no impacts.

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?

No Impact

According to *Map My County*, the existing land use designations for properties adjacent to, and surrounding the Project site are:

- North: Very Low Density Residential (VLDR) and Commercial Retail (CR)
- South: Rural Residential (RR) and Commercial Retail (CR)
- East: Commercial Retail (CR)
- West: Rural Residential (RR)

Therefore, implementation of the proposed Project will 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. There will be no impacts.

c) Would the Project expose people or property to hazards from proposed, existing or abandoned quarries or mines?

No Impact

Based on a site visit, it was observed that the Project is not located adjacent to an existing surface mine or a quarry. The closest mine is Leon Mine (33° 39' 11.69381" North, 117° 8' 12.13196" West), located approximately 3 miles northwesterly of the Project site.

Therefore, implementation of the proposed Project will not expose people or property to hazards from proposed, existing or abandoned quarries or mines. There will be no impacts.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

NOISE Would the Project result in:

26. Airport Noise

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

☐
☐
☐
☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) For a project located within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

Source(s): *General Plan*, Chapter 6, Safety Element, Figure S-20 *Airport Locations*; Google Maps; and *Map My County (Appendix A)*

Findings of Fact:

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

No Impact

The Project site is not located in an area which is governed by an airport master plan. The closest airport is the French Valley Airport, which is located approximately 3.4 miles south of the Project site. Therefore, implementation of the proposed Project would not result in an inconsistency with an Airport Master Plan. Therefore, this criterion is not applicable to the Project. No impacts will occur.

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

No Impact

Please reference the discussion under Threshold 26.a. Additionally, there are no private airstrips or helipads in the vicinity of the Project site. Therefore, this criterion is not applicable to the Project. No impacts will occur.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

27. Noise Effects by the Project	☐	☒	☐	☐
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, noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐

Source(s): *Temecula Valley Self-Storage Noise Impact Study*, prepared by RK Engineering Group, Inc., 1-15-2021 (*NIS*, **Appendix H**); *General Plan*, Table N-1 ("Land Use Compatibility for Community Noise Exposure"); *Temecula Valley Self Storage Noise and Air Quality, and GHG Analysis Supplemental Letter*, prepared by RK Engineering Group, Inc., 10-9-2020 (**Appendix K**); and Project Plans (**Appendix I**).

Note: Any tables or figures in this section are from the *NIS*, unless otherwise noted.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Findings of Fact:

- a) *Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?*

Less Than Significant Impact with Mitigation Incorporated

Overview

Fundamentals of Noise

This section provides basic information about noise and explains terms used in this section. Sound is a disturbance created by a moving or vibrating source and is capable of being detected by the hearing organs. The sound may be thought of as mechanical energy of a moving object transmitted by pressure waves through a medium to a human ear. For traffic or stationary noise, the medium of concern is air. *Noise* is defined as sound that is loud, unpleasant, unexpected, or unwanted. Sound pressure is measured in logarithmic units called decibels and are abbreviated as dB. The A-weighted scale of decibels (dBA) represents the range of sound that most closely relates to human hearing. Typically, the human ear can barely perceive the change in the noise level of 3 dB. A change in 5 dB is readily perceptible and a change in 10 dB is perceived as being twice or half as loud. A doubling of sound energy results in a 3 dB increase in sound, which means that a doubling of sound energy (e.g., doubling the volume of traffic on a highway), would result in a barely perceptible change in sound level.

Finally, the average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five (5) decibels to sound levels in the evening from 7:00 to 10:00 PM and after addition of ten (10) decibels to sound levels in the night before 7:00 AM and after 10:00 PM.

County of Riverside Noise Regulations

General Plan Noise Element

The County of Riverside describes the adopted policies for noise/land use compatibility in the General Plan Noise Element. Noise compatibility is reviewed to determine if the Project's is compatible with the surrounding land uses. The County's Noise Element is provided in Appendix A of the *Noise Impact Study (NIS, Appendix H)*.

Table 27-1, *Riverside County Noise/Land Use Compatibility Standards*, shows the normally acceptable community noise exposure levels (CNEL) for land uses proposed on and those adjacent to the Project site.

**Table 27-1
Riverside County Noise/Land Use Compatibility Standards**

Project Land Use Categories	Normally Acceptable Noise Level (CNEL)
Single Family Residential	60 dBA
Commercial	70 dBA

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Noise Ordinance

The Riverside County Board of Supervisors has adopted Ordinance No. 847 to establish countywide standards regulating noise. Per Ordinance No. 847, no person shall create any sound, or allow the creation of any sound, on any property that causes the exterior sound level on any other occupied property to exceed the sound level standards set forth in **Table 27-2, Riverside County Noise Ordinance Standards**. It should be noted that Ordinance No. 847 is not intended to establish thresholds of significance for the purpose of any analysis required by the California Environmental Quality Act. **Table 27-2** shows the sound level standards established in the Riverside County Ordinance No. 847, as they pertain to land uses surrounding the Project site.

**Table 27-2
Riverside County Noise Ordinance Standards**

Land Use	Maximum Decibel Level (Lmax)	
	7 a.m. - 10 p.m.	10 p.m. - 7 a.m.
Community Development (Very Low Density and Low Density Residential, Rural Residential)	55 dBA	45 dBA
Community Development (Commercial Tourist, Retail Commercial)	65 dBA	55 dBA

Ordinance No. 847 indicates that construction noise is exempt from the noise ordinance, provided any of the following are satisfied:

- Private construction projects located one-quarter (1/4) of a mile or more from an inhabited dwelling;
- Private construction projects located one-quarter (1/4) of a mile from an inhabited dwelling, provided that:
 - Construction does not occur between the hours of 6:00 PM and 6:00 AM during the months of June through September; and
 - Construction does not occur between the hours of 6:00 PM and 7:00 AM during the months of October through May.

Existing Noise Environment

A detailed Noise Impact Study (*NIS*) was prepared to determine if Project construction or operation would have any significant noise impacts on surrounding land uses (i.e., closest sensitive receptor). The *NIS* identified the existing noise environment for the Project site and the surrounding area based on noise measurements collected specifically for the Project. Noise measurement data indicates that traffic noise propagating from the adjacent roadways (i.e., Winchester Road to the east and Keller Road to the north) are the main sources of ambient noise at the Project site and surrounding area.

The results of the short-term measurements are presented in **Table 27-3, Short-Term Noise Measurement Results**.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Table 27-3
Short-Term Noise Measurement Results¹

L_{eq}	L_{min}	L_{max}	L₂	L₈	L₂₅	L₅₀
44.1	32.7	55.0	52.0	49.7	43.6	40.2

¹ Noise measurements conducted for 10-minute intervals during normal daytime conditions.

Noise measurements were taken at the western property line at approximately 220 feet from the northern property line which is the minimum distance to the closest sensitive receptor (single family residential unit west of the site). Ambient noise levels are mainly the result of traffic along Winchester Road and Keller Road adjacent to the site.

The Project proposes to construct and operate a self-storage facility with an office as well as recreational vehicle (RV) and boat parking. The Project will also consist of the construction and paving of approximately 15,530 square feet of Keller Road along the Project frontage to provide vehicular access to the site.

Construction Impacts

Short-term construction noise is anticipated to be the main source of potential noise impacts from the Project. The *NIS* estimated that the type of equipment that could typically be used on the Project site would vary from 68 dBA from vibrators up to 105 dBA for piledrivers at 50 feet from the noise source (*NIS* Table 11).

Table 27-4, *Project Construction Noise Levels – Western Property Line*, shows estimated construction noise levels for different types of equipment during each phase of development as measured from the western property line (shortest distance to the closest sensitive receptor to the west).

**Table 27-4
Project Construction Noise Levels – Western Property Line**

Phase	Equipment	Quantity	Equipment Noise Level at 50 feet (dBA Leq)	Combined Noise Level (dBA Leq)
Site Preparation	Rubber Tired Dozers	3	77.7	87.6
	Tractors/Loaders/Backhoes	4	80.0	
	Excavators	1	76.7	
Grading	Graders	1	81.0	87.3
	Rubber Tired Dozers	1	77.7	
	Tractors/Loaders/Backhoes	3	80.0	
	Cranes	1	72.6	
	Forklifts	3	71.0	
Building Construction	Generator Sets	1	77.6	86.3
	Tractors/Loaders/Backhoes	3	80.0	
	Welders	1	70.0	
	Cement and Mortar Mixers	2	74.8	
	Pavers	1	74.2	
Paving	Paving Equipment	2	73.0	84.3
	Rollers	2	73.0	
	Tractors/Loaders/Backhoes	1	80.0	
Architectural Coating	Air Compressors	1	73.7	73.7
Worst Case Construction Phase Noise Level – Leq (dBA)				87.6

As shown in **Table 27-4**, the Project is expected to generate noise levels which range from 73.7 dBA to 87.6 dBA along the western property line.

The degree of construction noise will vary for different areas of the Project site and also vary depending on the construction activities. During the construction period, the contractors would be required to comply with County of Riverside Ordinance No. 847 (outlined in the *NIS* as Project Design Feature DF-NOI-1) which indicates that construction noise is exempt from the noise ordinance, provided certain conditions, as outlined below, are followed.

Construction-related noise activities shall comply with the following requirements set forth in the

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

County of Riverside Ordinance No. 847:

1. Construction does not occur between the hours of 6:00 p.m. and 6:00 a.m. during the months of June through September.
2. Construction does not occur between the hours of 6:00 p.m. and 7:00 a.m. during the months of October through May.

Adherence to County of Riverside Ordinance No. 847 is a standard condition and considered regulatory compliance (i.e., it is not considered unique mitigation under CEQA).

The NIS indicated that any potential construction-related noise impacts would be less than significant. Additionally, the NIS recommended Project Design Features (DF-NOI-2 through DF-NOI-4) that would further reduce any noise during construction. The County is unable to effectively monitor implementation of such Project Design Features, so this assessment incorporates them as **Mitigation Measures MM-NOI-1 through MM-NOI-3**.

While construction-related noise impacts would be less than significant as demonstrated in the NIS, implementation of Conditions of Approval and/or Mitigation Measures help to even further decrease any potential noise levels from the Project construction to the closest sensitive receptor.

Operational Impacts

The Project would produce a small amount of operational noise from typical vehicular traffic in the parking area (including trash collection and delivery trucks) and heating ventilation and air conditioning (HVAC) mechanical equipment. However, due to the type of land use (i.e., self-storage), daily operation of the Project will not result in significant amounts of traffic, either on or off-site, or any on-site activities that would generate high noise levels beyond the boundaries of the site. The NIS concluded the Project would not generate significant operational noise at the adjacent property line. In addition, the site plan shows that potential noise from on-site traffic or storage activities would be blocked to the west by the placement of storage buildings. The only sensitive receptors near the Project site are to the west. Therefore, the NIS stated that only construction noise impacts were quantified, as outlined below:

Short-term construction noise is anticipated to be the main source of potential noise impacts from the project, and while the project would produce some operational noise, from typical vehicular traffic in the parking area (including trash collection and delivery trucks) and HVAC mechanical equipment, it is not expected to generate significant operational noise at the adjacent property line. Therefore, for purposes of this analysis, only construction noise impacts have been quantified and analyzed.

The NIS indicated that potential operational noise impacts would be less than significant. Additionally, the NIS recommended Project Design Features (DF-NOI-5 through DF-NOI-7) that would further reduce any noise during operations. To effectively monitor implementation of these Design Features, this assessment incorporates them as **Mitigation Measures MM-NOI-4 through MM-NOI-6**.

The Project as proposed would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies and any impacts

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

are considered less than significant. However, Mitigation Measures are proposed to help the County establish Conditions of Approval for the Project that will further help to reduce any potential noise.

b) *Would the Project result in the generation of excessive ground-borne vibration or ground-borne noise levels?*

Less Than Significant Impact

Vibration Background

Ground-borne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. The effects of ground-borne vibrations typically only cause a nuisance to people, but at extreme vibration levels, damage to buildings may occur. Although ground-borne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. Ground-borne noise is an effect of ground-borne vibration and only exists indoors since it is produced from noise radiated from the motion of the walls and floors of a room and may also consist of the rattling of windows or dishes on shelves.

Several different methods are used to quantify vibration amplitude.

- **PPV:** Known as the peak particle velocity (PPV) which is the maximum instantaneous peak in vibration velocity, typically given in inches per second.
- **RMS:** Known as the root mean squared (RMS) can be used to denote vibration amplitude.
- **VdB:** A commonly used abbreviation to describe the vibration level (VdB) for a vibration source.

Typically, developed areas are continuously affected by vibration velocities of 50 vibration decibels (VdB) or lower. These continuous vibrations are not noticeable to humans whose threshold of perception is around 65 VdB. Outdoor sources that may produce perceptible vibrations are usually caused by construction equipment, steel-wheeled trains, and traffic on rough roads, while smooth roads rarely produce perceptible ground-borne noise or vibration. To counter the effects of ground-borne vibration, the Federal Transit Administration (FTA) has published guidance relative to vibration impacts. According to the FTA, fragile buildings can be exposed to ground-borne vibration levels of 0.3 inches per second without experiencing structural damage. Vibration can be transient or continuous in nature. Each category can result in varying degrees of ground vibration, depending on the equipment used on the Project site. The NIS estimated that construction equipment that could be used on the Project site would generate from 58 VdB for a small bulldozer up to 112 VdB (piledriver) at 25 feet from the vibration source (NIS Table 13). Operation of equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Buildings in the vicinity of the Project area site respond to these vibrations with varying results ranging from no perceptible effects at the low levels to slight damage at the highest levels. **Table 27-5, Project Construction Vibration Impacts**, shows the estimated vibration impacts of the Project at 30 feet and 200 feet from the Project site – it should be noted the closest sensitive receptor to the Project site is a barn as part of a single-family home which is approximately 30 feet from the Project site although the residence itself is approximately 200 feet west of the Project site.

**Table 27-5
Project Construction Vibration Impacts**

Construction Activity	Calculated Vibration Level in PPV (in/sec)	Damage Potential Level
30 feet from Project site		
Vibratory Roller	0.172	No Impact
Bulldozer	0.073	No Impact
Loaded Trucks	0.062	No Impact
200 feet from Project site		
Vibratory Roller	0.021	No Impact
Bulldozer	0.009	No Impact
Loaded Trucks	0.008	No Impact

Source: N/S Tables 14 and 15

Table 27-5 demonstrates that Project-related vibration will not exceed 0.021 PPV (inches/second) at the closest sensitive receptor. This level of vibration is below the FTA threshold for impacts and considered barely perceptible at that level. Therefore, the Project will result in less than significant impacts in terms of the generation of excessive ground-borne vibration or ground-borne noise levels.

Mitigation: The following are recommended in the *N/S* as Design Features and carried over here as mitigation measures to effectively monitor implementation of these Design Features to help further reduce potential construction and operational noise impacts of the Project.

Construction

- MM-NOI-1** During construction, the contractor shall ensure all construction equipment is equipped with appropriate noise attenuating devices and equipment shall be maintained so that vehicles and their loads are secured from rattling and banging. Idling equipment shall be turned off when not in use.
- MM-NOI-2** Locate staging area, generators and stationary construction equipment as far from the nearest residential receptors as reasonably feasible.
- MM-NOI-3** No impact pile driving activities are expected to occur on the Project site during construction. If impact pile driving is required, a follow-up noise and vibration impact assessment shall be conducted, and vibration monitoring program shall be performed prior to start of any pile driving activity.

Operation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

MM-NOI-4 The daily hours of operation of the self-storage facility shall be limited to the daytime hours of 7:00 a.m. to 7:00 p.m.

MM-NOI-5 All HVAC equipment shall be fully shielded or enclosed from line of sight of any adjacent property or outdoor habitable area on the site or to the closest sensitive receptor to the west.

MM-NOI-6 All delivery vehicles shall be prohibited from excessive idling which is defined as five (5) minutes or longer.

Monitoring: These measures will be monitored and implemented during Project construction or operation as indicated in the specific measure.

PALEONTOLOGICAL RESOURCES:

28. Paleontological Resources

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

☐
☐
☒
☐

Source(s): *General Plan, Figure OS-8, Paleontological Sensitivity; Map My County (Appendix A); and Paleontological Resources Assessment Report, Temecula Valley (Keller Road) Self-Storage Project, prepared by CRM TECH, 10-5-2020 (Paleo Report, Appendix F).*

Findings of Fact:

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

Less Than Significant with Mitigation

According to the Project *Paleo Report (Appendix F)*, the results of the records searches and the literature review suggest that the central portion of the site contains Mesozoic-age phyllite which is considered to have a low paleontological sensitivity. However, the northeastern and southwestern portions of the site contain Pleistocene-age alluvium which has a high potential to contain significant nonrenewable paleontological resources and is known to have yielded significant fossil remains elsewhere in Riverside County. While no fossil deposits were found onsite or within the surrounding area, per the County General Plan, Figure OS-8, many vertebrate fossil deposits have been found in the surrounding region in similar alluvial soil units. Any earth-moving activities in the northeastern and southwestern portions of the Project area may therefore potentially disrupt or adversely affect paleontological resources.

The *Paleo Report* concluded the proposed Project has a high potential to impact significant nonrenewable paleontological resources in the northeastern and southwestern portions of the site where subsurface deposits of mid-Pleistocene sediments are present. The *Paleo Report* recommended retention of a Project paleontologist and preparation of a Paleontological Resource Impact Mitigation Program (PRIMP) to address this potential impact.

The County has a Standard condition of approval (COA) that it requires be implemented when there is a potential for impacts to paleontological resources such as with the proposed Project. Therefore, the County will require the proposed Project to implement this standard COA which

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

requires the applicant to retain a qualified paleontologist approved by the County of Riverside to create and implement a Project-specific plan for monitoring site grading/earthmoving activities. This Project paleontologist shall review the approved development plan and grading plan and shall conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the Project paleontologist in a PRIMP which must be submitted to the County Geologist for review and approval prior to issuance of a Grading Permit.

Pursuant to CEQA, a standard COA is considered regulatory compliance and is not considered mitigation. Therefore, implementation of the proposed Project with this standard COA will result in less than significant impacts that would directly or indirectly destroy a unique paleontological resource, or site, or unique geologic features, and no mitigation is required.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

POPULATION AND HOUSING Would the Project:				
29. Housing	☐	☐	☐	☒
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?	☐	☐	☒	☐
c) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	☐	☐	☒	☐

Source(s): Project Plans (**Appendix I**); *General Plan*, Housing Element; and Southwest Area Plan.

Findings of Fact:

- 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 is a self-storage project and, as such, has a very limited potential to directly induce population growth. Due to the size of the Project, the size of population growth will be nominal. Any proposed improvements to roadways shall be constructed in accordance with the General Plan Circulation Element as a result of the Project. Any other infrastructure will be installed to serve the Project. Any impacts will be less than significant.

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

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

No Impact

The proposed Project site is currently vacant. There are no existing people, structures or housing on the site. Therefore, implementation of the proposed Project will not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. There will be no impacts.

- c) *Would the Project create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?*

Less Than Significant Impact

The proposed Project is a self-storage project and, as such, has a very limited potential to indirectly create additional demand for housing. Based on the setting for the Project, type of development, and size of the Project, the Project could create a demand for housing that is affordable to those with lower income. Therefore, implementation of the proposed Project could create an indirect demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income. Due to the size of the Project, these impacts will be less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

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

30. Fire Services ☐ ☐ ☒ ☐

Source(s): *General Plan*, Chapter 6, Safety Element, Figure S-13 *Inventory of Fire Stations/Facilities*; Riverside County General Plan EIR No. 521 (*GPEIR*), Section 4.13.2.5, Fire Protection Services in Riverside County, and Section 4.17.2 Fire Protection Services; Ordinance No. 659 (An Ordinance of the County of Riverside Amending Ordinance No. 659 Establishing a Development Impact Fee Program); and Google Maps.

Findings of Fact:

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

Less Than Significant Impact

The Project site is served by the Riverside County Fire Department/Cal Fire. The Project site is

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

generally equidistant between two fire stations, Fire Station #34 and Fire Station #83:

- Riverside County Fire Department Station #34, 32655 Haddock Street, Winchester, CA 92596. This station is located approximately 6 miles north of the Project site; and
- French Valley Fire Station #83, 37500 Sky Canyon Drive, Murrieta, CA 92563. This station is located approximately 4 miles south of the Project site.

The Project proposes the construction and operation of a commercial Self-Storage Facility and RV Parking to serve both the existing and the expanding population base. The proposed Project will contribute an incremental increase in demand for fire services, but it is not anticipated to require the construction of additional fire protection facilities, or the alteration/expansion of existing station facilities.

As part of the Project approval(s), standard conditions are assessed on the proposed Project to reduce impacts from the proposed Project to fire services. This is reflected in Ordinance No. 659. The Project applicant shall comply with the provisions of Ordinance No. 659, which requires payment of the appropriate fees set forth in the Ordinance. Adherence to Ordinance No. 659 is a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

Compliance with the applicable design requirements and payment of its full, fair share of infrastructure costs would ensure that the proposed Project would not adversely impact current fire protection services.

Impacts from implementation of the proposed Project that would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire services, are considered incremental, and less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

31. Sheriff Services	☐	☐	☒	☐
-----------------------------	--------------------------	--------------------------	-------------------------------------	--------------------------

Source(s): *General Plan*, Chapter 6, Safety Element, Figure S-14 *Inventory of Emergency Response Facilities*; Riverside County General Plan EIR No. 521 (*GPEIR*), Section 4.17.3, Law Enforcement Services; Ordinance No. 659; and Google Maps.

Findings of Fact:

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

Less Than Significant Impact

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Law enforcement services to the Project site are provided by the Riverside County Sheriff's Department. The closest sheriff's station is located approximately 4.5 miles southwest of the Project site at 30755 Auld Road in Murrieta.

The Project proposes the construction and operation of a commercial Self-Storage Facility and RV Parking to serve both the existing and the expanding population base. The proposed Project does not include a residential component which is the principal driver of the need for law enforcement services.

The proposed Project will contribute an incremental increase in demand for law enforcement services, but it is not anticipated to require the construction of additional law enforcement facilities, or the alteration/expansion of existing sheriff station facilities.

As part of the Project approval(s), standard conditions are assessed on the proposed Project to reduce impacts from the proposed Project to sheriff/law enforcement services. This is reflected in Ordinance No. 659. The Project applicant shall comply with the provisions of Ordinance No. 659, which requires payment of the appropriate fees set forth in the Ordinance. Adherence to Ordinance No. 659 is a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

Impacts from implementation of the proposed Project that would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for sheriff services, are considered incremental, and less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

32. Schools	☐	☐	☒	☐
--------------------	--------------------------	--------------------------	-------------------------------------	--------------------------

Source(s): GPEIR, Section 4.17.5, Schools.

Findings of Fact:

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

Less Than Significant Impact

The proposed Project is located within the Temecula Valley Unified School District. The Project's proposed use is commercial in nature and no housing, which could potentially increase the demand for school services, is being proposed.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

The Project is subject to development impact fees for school facilities pursuant to State of California, Senate Bill 50 (SB 50). The commercial rate for these fees is lower than the residential rate, as commercial developments do not place a large demand on school facilities. The Project will be required to pay the school fees at the current rate at the time the fees are due. Payment of these fees is a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

With the payment of these development impact fees, less than significant impacts will occur.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

33. Libraries	☐	☐	☒	☐
----------------------	--------------------------	--------------------------	-------------------------------------	--------------------------

Source(s): GPEIR, Section 4.17.6, Libraries; Riverside County Library System; and Ordinance No. 659.

Findings of Fact:

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

Less Than Significant Impact

The County of Riverside operates a system of book mobiles to serve unincorporated populations.

Library impacts are typically attributed to residential development as reflected in Ordinance No. 659. The Project site's proposed commercial Self-Storage / RV Parking use would result in a very limited impact on library services.

Implementation of the proposed Project is not anticipated to result in the expansion of the existing library system or require any new construction of library facilities. The Project site's proposed commercial development will result in an incremental, but not significant, increase in the demand of library services.

The Project applicant shall comply with the provisions of Ordinance No. 659, which requires payment of the appropriate fees set forth in the Ordinance. Adherence to Ordinance No. 659 is a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

With payment of the appropriate fees set forth in the Ordinance, any impacts from implementation of the proposed Project that would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services, are considered less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

34. Health Services	☐	☐	☐	☒
----------------------------	--------------------------	--------------------------	--------------------------	-------------------------------------

Source(s): GPEIR, Section 4.17.7, Medical Facilities; and Google Maps.

Findings of Fact:

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

No Impact

The Project site development plan proposes commercial Self-Storage / RV Parking use. The proposed Project does not include a residential component which is the principal driver of the need for health services. As the County's population grows, new medical facilities will be required to provide health and medical services for an expanded population. Since the Project, as proposed, is consistent with the existing General Plan Land Use Plan designation of Commercial Retail (CR), the proposed Project would not impact the County-wide health and medical facilities to a greater degree than was anticipated in the General Plan. Residential development places a much larger burden on these public services.

Therefore, the Project will not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for health services. There will be no impacts.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

Source(s): *Map My County (Appendix A); Ordinance No. 460; Ordinance No. 659; Project Plans (Appendix I); and Parks & Open Space Department Review.*

Findings of Fact:

- a) *Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

No Impact

As outlined in Threshold 29.a above, the proposed Project has no housing component, therefore, it would not generate any new residents who would need or want to utilize recreational facilities. Therefore, it will not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Self-storage projects do not create substantial impacts to these facilities. No impacts will occur.

- b) *Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

No Impact

The proposed Project is commercial in nature and has no housing component, therefore, it would not generate any new residents who would need or want to utilize recreational facilities. The Project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. For these reasons, the proposed self-storage Project does not create any impacts on these facilities. No impacts will occur.

- c) *Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?*

No Impact

As outlined in Thresholds 29.a and 29.b above, this commercial Project has no housing component, therefore, it would not generate any new residents who would need or want to utilize recreational facilities. Based on this, the proposed Project would not affect any CSAs or recreation and park districts with a Community Parks and Recreation Plan (Quimby fees). There will be no impacts.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

36. Recreational Trails

☐ ☐ ☐ ☒

- a) Include the construction or expansion of a trail system?

Source(s): SWAP, Figure 8, *Southwest Area Plan Trails and Bikeway System*; Project Plans (Appendix I).

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

Findings of Fact:

- a) *Include the construction or expansion of a trail system?*

No Impact

According to SWAP Figure 8, *Southwest Area Plan Trails and Bikeway System*, there are no trails planned along the Project frontage. Therefore, the Project will not include the construction or expansion of a trail system. No impacts will occur.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

TRANSPORTATION Would the Project:				
37. Transportation	☐	☐	☒	☐
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☒	☐
d) Cause an effect upon, or a need for new or altered maintenance of roads?	☐	☐	☒	☐
e) Cause an effect upon circulation during the Project's construction?	☐	☐	☒	☐
f) Result in inadequate emergency access or access to nearby uses?	☐	☐	☐	☒

Source(s): *General Plan*; SWAP, Figure 8, *Southwest Area Plan Trails and Bikeway System*; Ordinance No. 348; *Map My County (Appendix A)*; Riverside Transit Agency (RTA) website; Riverside County Transportation Commission website; Ordinance No. 659 (An Ordinance of the County of Riverside Establishing a Development Impact Fee Program); Ordinance No. 824 (An Ordinance of the County of Riverside Authorizing Participation in the Western Riverside County Transportation Uniform Mitigation Fee Program); Ordinance No. 461 (County of Riverside, State of California Road Improvement Standards and Specifications); *Technical Advisory on Evaluating Transportation Impacts in CEQA*, prepared by the California Governor's Office of Planning and Research, 12-2018 (OPR Advisory); *Temecula Valley Self Storage Noise and Air Quality and Greenhouse Gas Impact Study*, prepared by RK Engineering Group, Inc., 6-29-2020 (AQ/GHG Study **Appendix B**); and Project Plans (**Appendix I**).

Findings of Fact:

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

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Less Than Significant Impact

Although the vehicle miles traveled (VMT) methodology is now applied in evaluating potential transportation impacts of a project, the County's General Plan identifies standards for maintaining an adequate level of service (LOS) for County streets and intersections. To be consistent with the 2020 State CEQA Guidelines, a LOS analysis is not required for purposes of this Initial Study impact analysis and determination of significant impacts under CEQA.

Transit. Bus service in western Riverside County is provided by the Riverside Transit Authority (RTA). RTA Route 79 currently runs north-south along Winchester Road (Highway 79 North) adjacent to the east boundary of the Project site. There are bus stops in either direction within a quarter mile of the site. Highway 79 North connects to other RTA routes to the north and south, including connections to the 215 Freeway west of the site via Domenigoni Parkway (Highway 74) to the north and via Murrieta Hot Springs Road to the south.

Bicycle and Pedestrian Trails. According to SWAP Figure 8, *Southwest Area Plan Trails and Bikeway System*, a Regional Trail: Urban/Suburban is generally located along Winchester Road on the east side of the Project frontage. Per the General Plan, Regional Urban and Rural Trails primarily connect communities, parks, and open space areas. The Project will include the construction or expansion of this trail/bike system, per the General Plan, which will occur during Project site improvements along the west side of Winchester Road adjacent to the Project site. Any impacts will be less than significant, and no mitigation is required.

Roadways. Every county in California is required to develop a Congestion Management Program (CMP) that looks at the links between land use, transportation, and air quality. In its role as Riverside County's Congestion Management Agency, the Riverside County Transportation Commission (RCTC) prepares and periodically updates the County's CMP to meet federal Congestion Management System guidelines as well as state CMP legislation. The Southern California Association of Governments (SCAG) is required under federal planning regulations to determine that CMPs in the region are consistent with the Regional Transportation Plan. The RCTC's current Congestion Management Program was adopted in March 2011. Interstate 15 and State Route 79 North (Winchester Road) are included in the CMP.

The RCTC CMP no longer requires traffic impact assessments for development proposals. However, local agencies are required to maintain the minimum LOS thresholds included in their respective general plans. If a street or highway segment included as part of the CMP falls below the adopted minimum level of service of E, a deficiency plan is required. The Project could conflict with the CMP if the Project were to cause the CMP facility to operate at an unacceptable LOS.

Some of the vehicle trips generated by the development on the Project site will connect to the CMP network at Interstate 15 and SR-79 North (Winchester Road), and development associated with the proposed Project may add an additional increment of traffic to the designated CMP network. Under the CMP guidelines, a project must generate at least 50 peak hour trips to require an assessment of traffic impacts under the CMP. According to **Table 37-1, Project Trip Generation**, the Project would generate 168 total daily trips, 14 daily AM peak trips, and 18 daily PM peak hour trips according to the most current Institute of Transportation Engineers (ITE) trip generation manual.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

**Table 37-1
Project Trip Generation**

Rate/Trips	ADT ¹	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Rate ²	17.96	0.71	0.68	1.39	0.98	0.97	1.95
Trips ³	168	7	7	14	9	9	18

Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, 10th edition, 2017.

¹ Average Daily Trips based on ITE Land Use Code 151 ("mini-warehouse" category equivalent to self-storage and RV parking).

² Trips per 100 storage units or 100 RV parking spaces (Project value is 9.32 or Project total divided by 100).

³ Rate times 900 storage spaces and 32 RV parking spaces per site plan (Project total is estimated at 932 spaces).

As shown in **Table 37-1**, the Project would not generate more than 50 peak hour trips, so even if all the Project peak trips were distributed to just one intersection (i.e., Winchester Road/Keller Road), it still does not represent a significant increase in vehicle trips relative to the CMP or would not contribute to cumulatively considerable traffic impacts due to the relatively small percentage increase in regional trips it represents.

The Project will also be required to pay its Transportation Uniform Mitigation Fee (TUMF) and Development Impact Fees (DIF), assessed on all projects, which collectively help reduce overall impacts to the transportation system (i.e., roads and intersections).

Based on this information, the Project will not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Any impacts will be less than significant.

b) Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact

In response to Senate Bill (SB) 743, the California Natural Resource Agency certified and adopted new CEQA Guidelines in December 2018, which now identify Vehicle Miles Traveled (VMT) as the most appropriate metric to evaluate a project's transportation impact under CEQA (Section 15064.3). Effective July 1, 2020, the previous CEQA metric of level of service (LOS), typically measured in terms of automobile delay, roadway capacity and congestion, will no longer constitute a significant environmental impact. As a result, the following VMT analysis is provided for this Project.

The County of Riverside has updated its traffic study guidelines as contained in the *Transportation Analysis Guidelines for Level of Service & Vehicle Miles Traveled (County of Riverside Transportation Department, December 2020)* to establish requirements and criteria for evaluating VMT on projects. Based on these guidelines, some projects are screened out from requiring a VMT analysis and if the appropriate criteria are met, the project VMT impacts are considered less than significant. Based on review of the County's screening criteria, the Project may be screened out of preparing a more detailed VMT analysis based on the "Small Projects" Criteria.

Based on the *County of Riverside Transportation Department, December 2020*, this applies to projects with low trip generation per existing CEQA exemptions or based on the County Greenhouse Gas Emissions Screening Tables, result in a 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO₂e) per year screening level threshold. If a project results in GHG emissions less than 3,000 MTCO₂e, as

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

determined by a methodology acceptable to the Transportation Department, the proposed Project is screened out from requiring a VMT analysis and the VMT impacts are considered less than significant.

Based on a detailed greenhouse analysis and air quality evaluation (*AQ/GHG Study*), the proposed Project is forecast to result in 800.5 MTCO₂e per year⁷, which is less than the County's threshold of 3,000 MTCO₂e per year. Therefore, based on the "Small Projects" criteria, the proposed Project is considered to have a less than significant VMT impact and no mitigation is required.

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

Less Than Significant Impact

The Project site is located at the intersection of two main roads in the French Valley area, Highway 79 North and Keller Road so it will have excellent regional and local access. Any proposed roadway improvements will be installed in conformance with Ordinance No. 461 and will be installed concurrently with other Project utilities or infrastructure facilities. Conditions of approval have been added to the Project to implement Ordinance No. 461. Therefore, implementation of the proposed Project will not substantially increase hazards to a circulation system design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Any impacts are considered less than significant.

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

Less Than Significant Impact

The Project site is located at the intersection of two main roads in the French Valley area, Highway 79 North and Keller Road. The development of the Project site will cause an effect upon or result in the need for new or altered maintenance of roads since 23' of existing asphalt on Keller Road will be replaced with new asphalt and an additional 10' of asphalt will be added to Keller Road (for a total of 33' of asphalt). Keller Road is an existing roadway that is assigned by the County of Riverside's roadway maintenance list. Roadways on that list require maintenance to be continuing and on-going on an annual basis. Therefore, impacts will be less than significant.

- e) *Would the Project cause an effect upon circulation during the Project's construction?*

Less Than Significant Impact

A limited potential exists to interfere with an emergency response or evacuation plan during construction. Construction work in the streets/roadways associated with the Project (i.e., Keller Road and Highway 79 North) will be limited to lateral utility connections (i.e., water) that will be limited to nominal potential traffic diversion. Control of access will ensure emergency access to the site and Project area during construction through the submittal and approval of a traffic control plan (TCP). In addition, compliance with Ordinance No. 457 regulating construction hours of operation and other County of Riverside Transportation Department procedures and permits will ensure that the safety of the traveling public is protected during construction. Following construction, emergency access to the Project site and area will remain as it was prior to the proposed Project.

⁷ Per Table 23 in the *AQ/GHG Study*

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

The proposed Project is required to comply with County Fire Department requirements for adequate access. Project site access and onsite circulation will provide adequate access and turning radius for emergency vehicles, consistent with the Fire Department's requirements.

Therefore, the Project will not cause an effect upon circulation during the Project's construction. Any impacts will be less than significant.

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

No Impact

The Project site is located at the intersection of two main roads in the French Valley area, Highway 79 North and Keller Road. The Project will not cause inadequate emergency access or access to nearby uses. The County of Riverside Fire Prevention Department has reviewed and conditioned the proposed Project without requiring additional emergency access or secondary access through other uses. No impacts will occur.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

38. Bike Trails

☐	☐	☒	☐
--------------------------	--------------------------	-------------------------------------	--------------------------

a) Include the construction or expansion of a bike system or bike lanes?

Source(s): *General Plan; and SWAP Figure 8, Southwest Area Plan Trails and Bikeway System.*

Findings of Fact:

b) *Include the construction or expansion of a bike system or bike lanes?*

Less Than Significant Impact

As discussed in Threshold 37.a, SWAP Figure 8, *Southwest Area Plan Trails and Bikeway System* indicates a Regional Trail: Urban/Suburban is generally located along Winchester Road on the east side of the Project frontage. Per the General Plan, Regional Urban and Rural Trails primarily connect communities, parks, and open space areas. They are designed to connect with trails in state and federal parks, forests, and recreational areas as well as trails within cities and other jurisdictions. Regional trails are designed to serve users needing soft trail surfaces, including equestrians, pedestrians, joggers, and mountain bikers. The Project will include the construction or expansion of this trail/bike system, per the General Plan, which will occur during Project site improvements. Any impacts will be less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

TRIBAL CULTURAL RESOURCES 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, or 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:

39. Tribal Cultural Resources

a) 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)?

☐
☒
☐
☐

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)

☐
☒
☐
☐

Source(s): County Archaeologist; and Assembly Bill 52 (AB 52).

Findings of Fact:

Less Than Significant with Mitigation Incorporated

a) *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)?*

Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change to a defined Tribal Cultural Resource (TCR) may result in a significant effect on the environment. AB 52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The lead agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQA complete to notify the requesting tribe as an invitation to consult on the project. AB 52 identifies examples of mitigation measures that will avoid or minimize impacts to a TCR. The bill makes the above provisions applicable to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/mitigated negative declaration circulated on or after July 1, 2015. AB 52 amends Sections 5097.94 and adds Sections 21073, 21074, 2108.3.1., 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to the California PRC, relating to Native Americans.

In compliance with Assembly Bill 52 (AB52), notices regarding this project were mailed to all requesting tribes on August 28, 2019. The following tribes did not respond to the AB52 notice:

- Colorado Indian Tribes (CRIT)
- Morongo Band of Mission Indians
- Pala Band of Mission Indians

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

- Ramona Band of Mission Indians

Consultations were requested by the following tribes:

Consultations were requested by the Temecula Band of Luiseño Indians (Pechanga), Rincon Band of Luiseño Indians and the Soboba Band of Luiseño Indians. Consultation was initiated with Rincon on October 01, 2019. A meeting was held on October 31, 2019, in which this project was discussed. The tribe requested the cultural report be provided before any recommendation could be considered. The report and the conditions of approval were sent to the tribe on September 17, 2020. On October 06, 2020, the updated cultural report and updated conditions of approval were sent to Rincon via email. On September 30, 2020, a letter was received from Rincon concluding consultation.

The Soboba Band requested to consult on this project and a meeting was held on February 26, 2020. The tribe requested the cultural report and recommended the full set of County standard conditions of approval be applied to this project. The report and conditions of approval were provided to the tribe on October 8, 2020, and on October 14, 2020, Soboba concluded AB52 consultation.

The Pechanga band requested consultation in a letter dated September 20, 2019. Consultation was initiated on October 01, 2019. On September 17, 2020, the Planning Department provided the following project information via email to Pechanga: PDA04829 (cultural report and conditions of approval). PDA08039, the updated cultural report and conditions of approval were sent to Pechanga via email on October 06, 2020, On October 08, 2020, an email with the final conditions of approval were provided to the tribe.

On December 02, 2020, this project was discussed during an AB52 consultation meeting. Pechanga requested changes to the language of two of the conditions of approval. These requests included an addition to the Cultural Resources Monitoring Plan (CRMP) to indicate that this document would be prepared in coordination with the consulting tribes. The other was that Pechanga requested to have the reference to the Western Center removed from the curation condition. The CRMP condition was edited but the curation condition was not. This condition was not changed due to the other tribes not being in agreement with the change. Information regarding this was sent to Pechanga on December 07, 2020. On December 14, 2020, Planning concluded consultation with Pechanga on the project.

No tribal cultural resources were identified on the project however the project has been conditioned for a Native American monitor to be present during ground disturbance in the event any unanticipated subsurface tribal cultural resources are identified they will be handled in a culturally appropriate manner. CEQA Guidelines Section 15064.5 (e) specifically addresses what to do in the event human remains of Native American descent are identified. A condition of approval has been attached to this project that reiterates that State law will be followed (Public Resources Code Section 5097.98; Health and Safety Code Section 7050.5). With the inclusion of **Mitigation Measures MM-CUL-1** and **MM-CUL-2**, impacts to previously unidentified Tribal Cultural Resources would be less than significant.

Impacts to potential tribal resources will be monitored through the building permit preview process by the affected Tribes as well as the County Archaeologist.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

b) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)*

Less Than Significant with Mitigation Incorporated

See the response to 39a, above. With the incorporation of **Mitigation Measures MM-CUL-1** and **MM-CUL-2**, the Project will not 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: 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. Impacts will be less than significant with the incorporation of mitigation.

Mitigation:

- MM-CUL-1** Native American Monitoring will be required so that in the event previously unidentified subsurface tribal cultural resources are discovered during grading, they will be handled appropriately and impacts in this regard will be less than significant with mitigation incorporated.
- MM-CUL-2** State CEQA Guidelines Section 15064.5 (e) specifically addresses what to do in the event that human remains are accidentally discovered in any location other than a dedicated cemetery. Although this is State law, a condition of approval has been placed on this and every project so that in the event previously unidentified subsurface human remains are discovered during grading they will be handled appropriately and impacts in this regard will be less than significant with mitigation incorporated.

Monitoring: Grading activities shall be monitored as outlined in the recommended measures which will be included in a Mitigation Monitoring and Reporting Program for the Project.

UTILITIES AND SERVICE SYSTEMS Would the Project:

40. Water

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects? | ☐ | ☒ | ☐ | ☐ |
| b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years? | ☐ | ☒ | ☐ | ☐ |

Source(s): *Temecula Valley Self-Storage Project*, prepared by Specialized Utilities Services Program (SUSP) Engineering, 5-2024, with *Preliminary Technical Report (PTR) with State Resources Control Board, Division of Drinking Water Preliminary Review 6-19-2024 (Appendix M)*; *Project Specific Water Quality Management Plan, Temecula Valley*

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Self-Storage, prepared by The Prizm Group, 6-15-2022 (*WQMP*, **Appendix G1**); *Temecula Valley Mini Storage CUP 190012 SWC Keller Road and Winchester Road*, *Preliminary Hydrology Analysis*, prepared by The Prizm Group, 4-7-2022 (*Hydro Study*, **Appendix G2**); *Project Plans (Appendix I)*; *Map My County (Appendix A)*; *Onsite Wastewater Treatment System Report and Design for Onsite Water Treatment Utilizing an Advanced Treatment System (ATS)*, *Proposed Commercial Development*, Assessor Parcel Number 476-010-060, Located on the South West Corner of Winchester Road and Keller Road, City of Winchester, Riverside County, California, prepared by Earth Strata Geotechnical Services, Inc., 8-10-2024 (*ATS Report*, **Appendix E3**); SAN 53 – WS20230000929 - APN: 476-010-060, prepared by EMWD, 8-15-2023 (**Appendix L**); Eastern Municipal Water District 2020 Urban Water Management Plan (*EMWD 2020 UWMP*); Metropolitan Water District 2020 Urban Water Management Plan (2020 *RUWMP*).

Findings of Fact:

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

Less Than Significant with Mitigation Incorporated

Water

The Project site, along with the larger unincorporated community of French Valley, is located within the water service boundary of the Eastern Municipal Water District (EMWD). The French Valley community has witnessed significant development in recent years with expanding single-family and multi-family residential subdivision projects extending northwards along the SR-79 corridor. The Project site is situated approximately 0.33-mile northwest of the nearest EMWD water main (8") serving TR 29962, a portion of the Winchester 1800 Specific Plan #286, at the intersection of Woodshire Drive and Koon Street. The second closest water main (18") connection point, at present, is located approximately 0.39-mile southwest of the Project site at the intersection of Pourroy Road and Ruft Road.

As shown on the *Project Plans*, there are no water lines in place serving the Project site (no water lines in SR-79 or Keller Road). It is further noted, the Project site's proposed Self Storage Facility use requires significantly less water in comparison with more traditional commercial retail and office uses similar in size.

It is estimated that the Project will have 3 employees and approximately 5 customers per day who may use onsite water for drinking, restroom use, and landscaping. A worst-case estimate would be these persons would consume 150 gallons⁸ of water per day, so it is estimated the proposed Project would consume up to 1,200 gallons per day or 1.3 af of water per year. The proposed Project uses would have an incremental impact that is already anticipated and planned for in the 2020 *UWMP*. Therefore, it is anticipated that water supplies would be sufficient to serve the Project as proposed without the need for the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. The incremental impact resulting from implementation of the Project would be less than significant.

⁸ EMWD 2020 *UWMP* estimate for commercial employee consumption including landscaping.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Although the site is within their service area, EMWD has issued a “will serve letter” that indicates water and sewer connections are located more than 250 feet from the Project site. Therefore, the applicant must install a privately owned public water system (PWS) with a commercial well. In May 2024, a *Preliminary Technical Report (PTR)* was prepared and submitted to the State Water Resources Control Board, Division of Drinking Water, for a new commercial well in the west-central portion of the site. On June 19, 2024, the State completed its preliminary review and directed the applicant’s engineer to submit formal plans and specification for the PWS to them for review. The State indicated their letter did not imply approval of the water system and all application materials had to first be submitted, reviewed, and approved by the Riverside County Department of Environmental Health prior to receiving a domestic water supply permit to operate a public water system. It should be noted that the Project site currently has an existing domestic water supply well which will not be connected to the new water system. The existing well will not be used as an additional source to the proposed system.

The *PTR* indicates the new potable water system infrastructure will include a new 5,000 gallon community well, storage tank, booster pump, two hydro-pneumatic tanks, chlorine system, and distribution pipelines. No existing facilities or structures will be included in the new potable water system. The well will also supply landscape irrigation and fire protection systems. The well will have a depth of 260 feet with a minimum sanitary seal depth of 50 feet, a minimum 50-foot setback from property lines, and a minimum 100 feet clearance from any sewer leach lines, as required. The proposed new well will satisfy Title 22 capacity requirements and its design, operation, and maintenance will need to be coordinated with EMWD as part of its overall groundwater management responsibilities for the region.

Assuming the new well is approved, the Project does not propose to connect to the existing EMWD water supply system per the *PTR*. This issue was also evaluated in Section 7, Hydrology and Water Quality, and **Mitigation Measure MM-HYD-1** was recommended to ensure the well is permitted and active prior to occupancy of the Project. It should also be noted that the Project’s proposed Self Storage Facility use requires significantly less water in comparison with more traditional commercial retail and office uses of similar size.

With respect to water supplies for the surrounding area, EMWD is a public water agency formed in 1950 and annexed into the service area of the Metropolitan Water District of Southern California (MWD) in 1951. It is currently one of MWD’s 26 member agencies. EMWD presently operates its water supply system under a system permit issued by the State Water Resources Control Board, Division of Drinking Water.

EMWD provides potable water, recycled water, and wastewater services to an area of approximately 555 square miles in western Riverside County. EMWD is both a retail and wholesale agency, serving a retail population of 546,146 people and a wholesale population of 215,075 people. As noted in the *2020 UWMP*, EMWD is located in one of the fastest growing regions in the nation, and with a growing population comes a growing demand for water.

EMWD has three sources of water supply: 1) imported water from the Metropolitan Water District of Southern California (MWD), 2) local groundwater, and 3) recycled water. Additional details with respect to the EMWD water supplies are set forth in Threshold 19.b.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Roughly 75% of EMWD’s potable water demand is supplied by imported water from MWD through its Colorado River Aqueduct and connections to the State Water Project. EMWD forecasts that it would provide water for future growth in its service area through imported water from MWD.

EMWD procures water from MWD that has been treated at MWD’s Skinner Filtration Plant in Winchester and the Mills Filtration Plant in Riverside. In 2010 EMWD obtained 75,000 acre-feet (af) of MWD water treated at MWD filtration plants before delivery, and 16,600 af of raw MWD water treated at EMWD water filtration plants. EMWD has two water filtration plants, one in Hemet and one in San Jacinto, with total existing capacity of 32 million gallons per day or about 35,840 af per year.

The Project proposes a commercial on-site water well to serve the proposed Self Storage Facility improvements, so implementation of the proposed Project would not require, or result in, the construction of new water treatment facilities or expansion of existing (EMWD) facilities, the construction of which would cause significant environmental effects. Any impacts would be less than significant, and no mitigation is required.

Wastewater/Sewer

The Project proposes construction of a self-storage facility with RV storage and manager’s office which has a minimal sewage generation factor (restroom facilities would be limited to the office area only). Although the site is within their service area, EMWD has issued a “will serve letter” that indicates water and sewer connections are located more than 250 feet from the Project site. Therefore, an Advanced Treatment System (ATS) is proposed adjacent to the Project site’s north property line, just west of the proposed access drive from Keller Road. The ATS will have to be reviewed and approved by the County Department of Environmental Health and Regional Water Quality Control Board prior to approval of any grading or development permits. This is a standard condition of approval for the County – it is considered regulatory compliance and not unique project mitigation under CEQA.

The Project description indicates there will be 3 employees on the site. It is estimated these employees would generate 50 gallons⁹ of wastewater per day. It is also estimated that approximately 5 customers per day could each generate 10 gallons of wastewater per day using the restroom facilities. Therefore, the proposed Project would generate a total of 200 gallons per day of wastewater.

With Health Department approval and installation of the ATS, implementation of the proposed Project would not require, or result in, the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Any impacts would be less than significant, and no mitigation is required.

Stormwater/Drainage

As previously discussed in Section 23 of this Initial Study (Hydrology and Water Quality), all new development in the County of Riverside is required to comply with provisions of the National Pollutant Discharge Elimination System (NPDES) program, including Waste Discharge Requirements, and the 2010 Santa Ana Municipal Separate Sewer Permit, as enforced by the Santa Ana Regional Water Quality Board.

⁹ EMWD website estimates 50 gallons of wastewater/person/day for commercial employees.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

In its existing condition, the Project site is vacant unimproved land situated at the southwest corner of SR-79 and Keller Road. The Project site is generally flat and at street grade along Winchester Road and Keller Road. The Project site elevation varies from approximately 1,415 feet to 1,430 feet above mean sea level. There are no on-site drainage improvements and stormwater runoff generally sheet flows to the south/southeast toward Winchester Road.

There is a natural drainage course extending across the southern portion of the Project site which will be preserved in conjunction with the proposed Project site development plan.

With adherence to the Project-specific Water Quality Management Plan (WQMP), the proposed Project will not substantially alter the existing drainage pattern of the site or area, nor will it require new or expanded off-site storm drain facilities.

The *Hydro Study* and the *WQMP* indicate that onsite stormwater runoff will be filtered through a biofiltration system then routed through the underground detention chambers and ultimately released offsite into the existing drainage channel along the west side of the site. Site improvements include installing pipe inlets in the curb to intercept low flows and direct them into self-retaining landscape areas behind the sidewalks. The WQMP indicates the 24-hour 85th percentile storm depth for the Project is 0.80 inches which will be accommodated onsite in the underground chambers. Runoff is carried downstream and eventually reaches Warm Springs Creek in Murrieta to the southwest.

Based on the above data and analysis, implementation of the proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects. Any impacts would be less than significant.

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 with Mitigation Incorporated

As previously discussed in Threshold 40.a, the Project site is located within the water service boundary of the EMWD. The closest EMWD water service line is located approximately 0.33-mile southeast of the Project site (at the intersection of Woodshire Drive and Koon Street) with a second water service line located approximately 0.39-mile southwest of the Project site (at the intersection of Pourroy Road and Ruft Road). The site has an existing individual water well but as explained in Impact Issue (a) above, the Project will design, have permitted, construct, and operate a new commercial water well as part of a new privately owned public water supply (PWS) system. This system must be reviewed and approved by the State Division of Drinking Water, the County Department of Environmental Health, and Eastern Municipal Water District before an operating permit can be issued. This issue was evaluated previously in Impact Analysis Section 7, Hydrology and Water Quality, and **Mitigation Measure MM-HYD-1** was recommended to assure the new well is constructed and operated under appropriate regulatory oversight and with required permits.

With operation of the new well, the Project does not propose to connect to the existing EMWD water supply system. It should also be noted that the Project’s proposed Self Storage Facility use requires significantly less water in comparison with more traditional commercial retail and office uses of

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

similar size. If the Project should request EMWD district water service in the future, water supplies are currently available and sufficient to serve the Project.

Since the Project will not require water supplies from EMWD, it is consistent with the EMWD water supply/demand analysis within its service area is set forth in the *EMWD 2020 UWMP* which assesses the District's ability to satisfy demands during three (3) hydrologic scenarios, including: 1) a normal water year, 2) single-dry water year, and 3) multiple-dry water years. The supply-demand balance for each of the hydrologic scenarios within the EMWD service area was projected for the 25-year planning period 2020 to 2045. The proposed Project is consistent with the land uses in the approved General Plan which was the basis for developing the UWMP. Based on the analysis and conclusions set forth in the *EMWD 2020 UWMP* (Sec 7.6 *Supply and Demand Assessment*), EMWD will be able to meet 100% of its demand under all three hydrologic scenarios through the year 2045.

Therefore, sufficient water supplies are available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Any impacts would be less than significant.

Mitigation:

- MM-HYD-1** Prior to the issuance of a certificate of occupancy, the applicant shall install a new commercial well in the west-central portion of the property. This well must be approved and permitted by the State Division of Drinking Water and the Riverside County Department of Environmental Health (domestic water supply permit) to operate the proposed new privately owned public water system. The design, construction, and operation of the new well must also be coordinated with the Eastern Municipal Water District as part of its overall regional groundwater management responsibilities. This measure shall be implemented to the satisfaction of the County Planning Department in consultation with the County Department of Environmental Health.

Monitoring: Measure shall be monitored by County Planning prior to occupancy of the Project.

41. Sewer	☐	☐	☒	☐
a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?				
b) Result in a determination by the wastewater treatment provider that serves or may service the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒

Source(s): *Project Plans (Appendix I); Onsite Wastewater Treatment System Report and Design for Onsite Water Treatment Utilizing an Advanced Treatment System (ATS), Proposed Commercial Development, Assessor Parcel Number 476-010-060, Located on the South West Corner of Winchester Road and Keller Road, City of Winchester, Riverside County, California, prepared by Earth Strata Geotechnical Services, Inc., 8-10-2024 (ATS Report, Appendix E3); SAN 53 – Will Serve Letter for WS20230000929 - APN: 476-010-060, prepared by EMWD, 8-15-2023 (Appendix L).*

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Findings of Fact:

- a) *Would the Project require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?*

Less Than Significant Impact

As discussed in Threshold 40.a, the Project site is located within the wastewater/sewer service boundary of EMWD. However, a sewer mainline is not located within 250 feet of the Project site (the closest sewer mainline is currently located in Abelia Street adjacent SE of SR-79).

The Project, which proposes construction of a self-storage facility with RV parking and a manager's office which has a minimal sewage generation factor (restroom facilities would be limited to the office area only), and, as such, is proposing an on-site wastewater treatment system instead of connecting to the municipal wastewater system. The Project proposes installation of an Advanced Treatment System (ATS) in the northwest portion of the site adjacent to the proposed access drive from Keller Road. An *ATS Report* was prepared for this Project, and this facility will be subject to permit requirements of the Riverside County Department of Environmental Health. This is considered regulatory compliance and not unique mitigation under CEQA.

It should also be noted that the Project Site Plan does not include any gasoline fueling stations or capabilities, and the RV Parking component does not include any propane fueling facilities or gray water dumping facilities. This will be verified by the County Department of Environmental Health through the County's development review process prior to issuance of any grading or building permit.

Other than the proposed on-site ATS system, implementation of the proposed Project will not require, or result in, the construction of new wastewater treatment facilities or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects. Any impacts will be less than significant, and no mitigation is required.

- b) *Would the Project result in a determination by the wastewater treatment provider that serves or may service the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?*

No Impact

As the Project Site Plan proposes an ATS system, the Project will not be connecting to the EVMWD wastewater/sewer treatment facilities. This criterion is not applicable to the proposed Project. There will be no impact.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

42. Solid Waste

- a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure,

☐	☐	☒	☐
--------------------------	--------------------------	-------------------------------------	--------------------------

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
or otherwise impair the attainment of solid waste reduction goals?				
b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	☐	☐	☒	☐

Source(s): CalRecycle, SWIS Facility Detail, El Sobrante Landfill, 33-AA-0217; El Sobrante Landfill Fact Sheet, issued by Waste Management of California; El Sobrante Landfill Annual Monitoring Report, by USA Waste of CA, Inc., 2021; *GPEIR*, Section 4.17.4, *Solid Waste Management*.

Findings of Fact:

- a) *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

Municipal waste collection services in the unincorporated French Valley community, inclusive of the proposed Project, are provided by Waste Management, Inc. The Riverside County Waste Management Department (RCWMD) is responsible for the efficient and effective landfill disposal of non-hazardous county waste. To accomplish this, the RCWMD operates six active landfills and administers a contract agreement for waste disposal at the private El Sobrante Landfill. The Department also oversees several transfer station leases, as well as a number of recycling and other special waste diversion programs.

The Project site is located within the service area of the El Sobrante Landfill, a service area that typically includes the cities/communities within southwestern Riverside County, as well as multiple jurisdictions within the counties of Los Angeles, Orange, San Bernardino and San Diego. Located near the center of the highly populated western third of Riverside County, according to Waste Management, Inc., the landfill's operator, it processes approximately 43% of Riverside County's annual waste.

The El Sobrante Landfill is located approximately twenty-five (25) miles northwest of the Project site in the unincorporated Temescal Canyon area of Riverside County between the City of Lake Elsinore and the City of Corona. The landfill, which is owned and operated by USA Waste of California (a subsidiary of Waste Management, Inc.) started disposal operations in 1986. From 1986 to 1998, the landfill was operated pursuant to the original El Sobrante Landfill Agreement, its Amendments and one Addendum.

On September 1, 1998, the Riverside County Board of Supervisors (BOS) approved the El Sobrante Landfill Expansion Project which increased the landfill disposal capacity to approximately 196.11 million cubic yards or approximately 109 million tons of municipal solid waste. Its daily capacity was increased to 70,000 tons per week, not exceeding 16,054 tons per day [limited in part due to the number of vehicle trips per day. A modified Solid Waste Facilities Permit for the El Sobrante Landfill was issued which revised the landfill's Estimated Closure Year from 2045 under the former 2009 permit, to 2051 pursuant to the current permit.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Riverside County evaluates current and projected solid waste generation for planning and public policy purposes in conjunction with the preparation of its General Plan and General Plan EIR. The anticipated growth in population (from new residential uses) and jobs and economic activity (from commercial, industrial and institutional uses) that would result from the approval and subsequent development of projects within the County result in a corresponding increase in the amount of solid waste generated by these various uses, both during their construction (short-term) and their operation (long-term). The disposal of this additional waste would incrementally increase the waste going into existing landfills, potentially hastening the end of their usable lives and contributing to the eventual need for new or expanded landfill facilities.

Solid waste generation rates estimate the amount of waste created by residences and businesses over a certain amount of time (day, year, etc.). Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill. Waste generation rates for residential and commercial activities can be used to estimate the impact of new developments on the local waste stream. In this way, they are useful in providing a general level of information for planning purposes and estimating potential effects. It should be noted that the Generation Rates used by the County do not take into account any recycling, reduction or diversion (potentially upwards of 50%-75%, associated with compliance with AB 341.

As set forth in the *GPEIR*, the County applies a Generation Rate of 2.4 Tons per 1,000 square feet of building area for commercial uses (“commercial” includes commercial-retail, commercial-tourist, commercial-office and business park uses), and a Generation Rate of 10.8 Tons per 1,000 square feet of building area for industrial uses (“industrial” includes light industrial, heavy industrial, and [for existing uses] ranches). There is not a specific category for a Self-Storage Facility or RV Parking. For purposes of this analysis, the Project’s self-storage use is analyzed as a commercial use, which represents a conservative estimate considering the type of use (i.e., self-storage) does not generate large daily amounts of solid waste.

The Project proposes construction of a self-storage facility with a manager’s office and RV parking spaces. Applying the County commercial Generation Rate of 2.4 tons per 1,000 square feet per year indicates the Project would generate 249.8 tons of solid waste per year (104,144 SF x (2.4 Tons/1,000 SF) which equals an average daily amount of 0.68 tons per day (249.8 ÷ 365 days = 0.68), which equals 1,370 pounds per day. Assuming a mandatory 50% recycling rate, daily solid waste generation is forecast to be approximately 0.34 tons (685 lbs.) per day for disposal at the El Sobrante Landfill. This represents a nominal amount of less than 0.001% (0.34 ton ÷ 8,738 tons) of the estimated average daily solid waste disposed at the El Sobrante Landfill.

Therefore, the Project site’s proposed Self-Storage and RV Parking use would not generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

b) *Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?*

Less Than Significant Impact

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

All land uses within the unincorporated Riverside County area that generate waste are required to coordinate with the County's contracted waste hauler (Waste Management, Inc.) to collect solid waste on a common schedule as established in applicable local, regional, and state programs.

Additionally, all development within the County is required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), AB 939 (CalRecycle), Title 8 of the County Municipal Code, and other local, state, and federal solid waste disposal standards.

The California Integrated Waste Management Act of 1989 (AB 939) requires every city and county in the state to prepare a Source Reduction and Recycling Element to its Solid Waste Management Plan, that identifies how each jurisdiction will meet the mandatory state diversion goal of 50 percent by and after the year 2000. The purpose of AB 939 is to "reduce, recycle, and re-use solid waste generated in the state to the maximum extent feasible."

All solid waste disposals within the unincorporated Riverside County area are subject to the requirements set forth in Title 8, Health and Safety, Chapter 8.24 County Solid Waste Facilities, as provided in the Municipal Code. Chapter 8.24 provides integrated waste management guidelines for service, prohibitions, and provisions of service. The provisions of service require that the County of Riverside provide for or furnish integrated waste management services relating to the collection, transfer, and disposal of refuse, recyclables, and compostables within and throughout the unincorporated county areas.

Additional local oversight is provided by the Riverside County Department of Waste Resources Planning Section which reviews all land-use/development cases processed within the County and issues conditions of approval on projects to ensure that Department facilities/assets/programs are protected from incompatible land uses, that adequate space is provided for collection of recyclables, that Waste Recycling Plans (Form B) and Waste Reporting (Form C) are submitted, and that projects will not overburden the solid waste disposal capacity of County facilities.

The Project site's development plan would be required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), AB 939, Title 8 of the County Municipal Code, and other applicable local, state, and federal solid waste disposal standards as a matter of regulatory policy, thereby ensuring that the solid waste stream to the waste disposal facilities is reduced in accordance with existing regulations. All of these requirements are considered regulatory compliance and not unique mitigation under CEQA. With regulatory compliance, any impacts would be less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

43. Utilities

Would the Project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

a) Electricity?	☐	☐	☒	☐
b) Natural gas?	☐	☐	☐	☒
c) Communications systems?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Street lighting?	☐	☐	☒	☐
e) Maintenance of public facilities, including roads?	☐	☐	☒	☐
f) Other governmental services?	☐	☐	☐	☒

Source(s): *Project Plans (Appendix I); Riverside County Ordinance No. 461, Ordinance No. 655, and Ordinance No. 659.*

Findings of Fact:

- a) *Would the Project impact electricity facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?*

Less Than Significant Impact

There is no electricity connection currently serving the Project site in its vacant and undeveloped condition. The Project site development plan which proposes construction of a Self-Storage Facility with RV Parking will require electrical service.

The electrical service provider for the Project site and the surrounding unincorporated French Valley community is Southern California Edison (SCE). Electrical service is in place to the existing rural residences adjacent west of the Project site and overhead electrical service lines extend east-west along the north side of Keller Road.

SCE is responsible for providing power supply to Riverside County while complying with County, State, and federal regulations. SCE's power system is one of the nation's largest electric and gas utilities and serves approximately 15 million people in 180 incorporated cities and 15 counties, in a service area of approximately 50,000 square miles in size (SCE 2019). SCE maintains 12,635 miles of transmission lines, 91,375 miles of distribution lines, 1,433,336 electric poles, 720,800 distribution transformers, and 2,959 substation transformers (SCE 2019).

Operation of the proposed Project would consume electricity for building power, building lighting, parking lot lighting, office air conditioning, and well water pumping, among other operational requirements. The Project has been designed to comply with various federal, state and local energy use regulations including Title 24.

The Project has been designed to meet all applicable local and state requirements regarding energy conservation, and this type of use (i.e., self-storage) would typically result in an incremental and relatively nominal increase in area-wide electrical consumption. Therefore, the Project would not result in potentially significant environmental effects from wasteful, inefficient, or unnecessary consumption of energy.

Adequate commercial electricity supplies are presently available in Southern California to meet the incremental increase in demand attributed to the Project. The proposed Project would not require new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant, and no mitigation is required.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

- b) *Would the Project impact natural gas facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?*

No Impact

The existing rural residences located adjacent west of the Project site rely on individual propane tanks for natural gas service. The natural gas provider for the unincorporated French Valley community is the Southern California Gas Company (SoCal Gas), also known as The Gas Company.

Based on a review of the *Project Plans*, there are no natural gas service lines adjacent to the Project site (no natural gas line in SR-79 or Keller Road). It is further noted, the Project site development plan does not propose to connect to the SoCal Gas system.

Based on this information, the proposed Project would not require or result in construction, expansion, or relocation of natural gas facilities that could result in a significant environmental effect. There would be no impact.

- c) *Would the Project impact communication systems facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?*

Less Than Significant Impact

The communication system is provided by Frontier Communications (formerly Verizon). Frontier Communications acquired all broadband and landline services from Verizon in the states of Texas, Florida, and California in April 2016 for a reported \$1.8 billion. Frontier Communications is a private company that provides connection to the communication system on an as needed basis. No expansion of facilities will be necessary to connect the Project to the communication system located adjacent to the Project site. Impacts would be less than significant, and no mitigation required.

- d) *Would the Project impact street lighting facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?*

Less Than Significant Impact

There are no streetlights in place along the Project site's SR-79 or Keller Road frontage. There is limited street lighting in place at the intersection of SR-79 and Keller Road that was installed in conjunction with the SR-79 Widening Project in 2014/2015.

The proposed Project will require the installation of streetlights along the public right-of-way in accordance with standard requirements, County Ordinance No. 461 (Road Improvement Standards and Specifications), and County Ordinance No. 655 (Regulating Light Pollution).

The intent of Ordinance No. 655 is to restrict the permitted use of certain light fixtures emitting into the night sky undesirable light rays which have a detrimental effect on astronomical observation and research at the Palomar Observatory. Ordinance No. 655 contains approved materials and

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

methods of installation, definitions, general design requirements, requirements for lamp source and shielding, prohibitions and exceptions.

Adherence to Ordinance No. 655 is typically a standard condition of approval and is not considered unique mitigation pursuant to CEQA. Any impacts from light and glare are discussed in Section 2 (Mt. Palomar Observatory) and Section 3 (Other Lighting Issues) of this Initial Study. Impacts would be less than significant, and no mitigation is required.

- e) *Would the Project impact maintenance of public facilities, including roads requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?*

Less Than Significant Impact

The proposed Project will have a less than significant impact on public facilities. Riverside County Ordinance No. 659 establishes a developer impact fee to mitigate the cost of public facilities, including roads.

The Project will be responsible for half-width street improvements along the Keller Road frontage, as shown on the *Project Plans*. The Project site SR-79 frontage was widened from two (2) to four (4) lanes on an interim basis in 2014/2015 in conjunction with the SR-79 Widening Project. The Project proposes a right-in/right-out access driveway towards the southerly portion of the SR-79 frontage.

In addition, the developer will be required to pay the County of Riverside's Development Impact Fee (DIF) and the regional Transportation Uniform Mitigation Fee (TUMF) to address the direct and cumulative environmental effects generated by new development projects.

As part of the Project approval, standard conditions are assessed on the proposed Project to reduce impacts from the proposed Project to transportation resources. This is reflected in Ordinance No. 659. The Project site is located in the Southwest Area Plan (SWAP) of the Riverside County General Plan. Prior to the issuance of a certificate of occupancy, the Project applicant shall comply with the provisions of Ordinance No. 659, which requires payment of the appropriate fees set forth in the Ordinance. Any impacts would be less than significant, and no mitigation would be required.

- f) *Would the Project impact other governmental services requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?*

No Impact

Regional Multi-Service Centers impacts are typically attributed to residential development. The Project is a commercial Self Storage and RV Parking development and would not generate new occupants or residents, so it would not directly impact Regional Multi-Service Centers. Therefore, implementation of the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

performance objectives for regional multi-service centers or other governmental services. No impacts will occur.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

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

44. Wildfire Impacts

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?	☐	☐	☒	☐
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Source(s): *Map My County (Appendix A); Project Plans (Appendix I); General Plan; Google Maps; Ordinance No. 787 (An Ordinance of the County of Riverside Adopting the 2016 California Fire Code as Amended); and Ordinance No. 659 (An Ordinance of the County of Riverside Amending Ordinance No. 659 Establishing a Development Impact Fee Program).*

Findings of Fact:

a) *Substantially impair an adopted emergency response plan or emergency evacuation plan?*

Less Than Significant Impact

The Project site is not located within a State Fire Responsibility Area (SRA) and is not classified as a very high fire hazard area.

The Project will take access from an existing roadway (Winchester Road), as well as Keller Road, that will be improved. These roadways will connect into part of an adopted emergency response plan/emergency evacuation plan, as implemented by the County of Riverside.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

The Project will be constructing a self-storage use, drainage facilities, and roadways. A limited potential exists to interfere with an emergency response or evacuation plan during construction. Control of access will ensure emergency access to the site and Project area during construction through the submittal and approval of a traffic control plan (TCP). The TCP is designed to mitigate any construction circulation impacts. The TCP is included as a standard condition and is not considered unique mitigation under CEQA.

The proposed Project will be reviewed, and conditions of approval will be placed on the Project to address any potential impacts to Fire Resources, consistent with the Fire Hazards section of the Safety Element of the General Plan, and Ordinance No. 787.

Prior to final map recordation, prior to grading permit issuance, prior to building permit issuance, and prior to building final inspection the Project will need to demonstrate compliance with Ordinance No. 787. Adherence to Ordinance No. 787 is a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

Another standard condition assessed on the proposed Project to reduce impacts from the proposed Project to fire services is Ordinance No. 659. The Project applicant shall comply with the provisions of Ordinance No. 659, which requires payment of the appropriate DIF fees set forth in the Ordinance. Adherence to Ordinance No. 659 is a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

Following construction, emergency access to the Project site and area will remain as it was prior to the proposed Project. Therefore, implementation of the Project will not substantially impair an adopted emergency response plan or emergency evacuation plan. Any impacts will be less than significant.

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?*

Less Than Significant Impact

The Project site is not located within an SRA and is not classified as a very high fire hazard area.

The existing topography is relatively flat. Elevations at the site range from approximately 1,215 to 1,230 feet above mean sea level (AMSL), for a difference of about 15± feet across the entire site. Drainage within the subject property generally flows to the northwest. Most of the vegetation on the site consists of sparse to moderate amounts of annual weeds/grasses, along with small to large trees bordering western portion of the subject site. There are no steep slopes within a half-mile of the Project site.

Additionally, the Project will provide impervious surfaces, irrigated landscaping, structures built in compliance with fire codes, fire hydrants, and other measures that will help to reduce wildfire risks.

Based on this information, the Project would not, 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. Any impacts will be less than significant.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

- 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?*

Less Than Significant Impact

The Project site is not located within an SRA and is not classified as a very high fire hazard area.

The Project would be installing interior roadways for Project circulation. The road system would be reviewed and approved by the County and County Fire. Once constructed, the County would maintain roadways and sidewalks within the public right-of-way. Once approved by the County and County Fire, impacts would be considered less than significant. The Project would also be installing fire hydrants at locations throughout the Project area per County Fire requirements. This would provide more fire suppression, which would not exacerbate fire risk. The Project would be installing power to serve the Project, as well as other necessary utilities, which would be underground and installed pursuant to the utility providers regulations. Underground utilities would not exacerbate fire risk.

Any impacts will be less than significant.

- 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?*

Less Than Significant Impact

The Project site is not located within an SRA and is not classified as a very high fire hazard area.

The existing topography is relatively flat. Elevations at the site range from approximately 1,215 to 1,230 feet AMSL, for a difference of about 15± feet across the entire site. Drainage within the subject property generally flows to the northwest. There are no steep slopes within a half-mile of the Project site.

While there is a drainage feature that crosses the Project site through the southern portion of the parcel, the Project site is in an area of minimal flood hazard and there are no large bodies of water in the Project vicinity. The Project will include hardscape and landscape improvements that would serve to stabilize the built environment (including drainage facilities).

Based on this information, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Any impacts will be less than significant.

- e) *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 not located within an SRA and is not classified as a very high fire hazard area.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

The proposed Project will be reviewed, and conditions of approval will be placed on the proposed Project to address any potential impacts to Fire Resources, consistent with the Fire Hazards section of the Safety Element of the General Plan, and Ordinance No. 787.

Prior to final map recordation, prior to grading permit issuance, prior to building permit issuance, and prior to building final inspection the Project will need to demonstrate compliance with Ordinance No. 787. Adherence to Ordinance No. 787 is a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

Another standard condition assessed on the proposed Project to reduce impacts from the proposed Project to fire services is Ordinance No. 659. The Project applicant shall comply with the provisions of Ordinance No. 659, which requires payment of the appropriate fees set forth in the Ordinance. Adherence to Ordinance No. 659 is a standard condition of approval and is not considered unique mitigation pursuant to CEQA.

Based on this information, the Project would not, expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Any impacts are considered less than significant.

Mitigation: No mitigation measures are required.

Monitoring: No mitigation monitoring is required.

MANDATORY FINDINGS OF SIGNIFICANCE Does the Project:				
45. 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?	☐	☒	☐	☐

Source(s): Staff Review; and Project Plans (**Appendix I**)

Findings of Fact:

Less Than Significant with Mitigation Incorporated

Implementation of the proposed Project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or 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.

Please reference the discussions in Section 7 (Biological Resources – Wildlife & Vegetation), Section 8 and 9 (Cultural Resources – Historic Resources and Archaeological Resources), Section 28 (Paleontological Resources – Paleontological Resources), and Section 39 (Tribal Cultural Resources).

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

In addition to **Mitigation Measures MM-BIO-1** through **MM-BIO-3** and **Mitigation Measures MM-CUL-1** and **MM-CUL-2**, standard conditions will apply to the proposed Project. Any impacts are considered less than significant with mitigation incorporated.

46. Have impacts which 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, other current projects and probable future projects)?	☐	☒	☐	☐
---	--------------------------	-------------------------------------	--------------------------	--------------------------

Source(s): Staff Review; Sections 1-44; and Project Plans (**Appendix I**)

Findings of Fact:

Less Than Significant with Mitigation Incorporated

The Project does not have impacts which are individually limited, but cumulatively considerable. As demonstrated in Sections 1 – 44 of this Environmental Assessment, in particular regarding air quality and greenhouse gas emissions that have established thresholds to consider cumulative impacts as well as hydrology and traffic impacts that consider the existing and currently planned development of the area and the specific respective drainage and traffic impacts to the overall area in a cumulative manner. As illustrated in the EA, the Project will not have any impacts that cannot be reduced to less than significant with the incorporation of mitigation, Project design features, and/or conditions of approval. Therefore, no cumulative impacts are anticipated to occur. The EA recommended **Mitigation Measures MM-AQ-1** through **MM-AQ-11** for air quality impacts and **MM-NOI-1** through **MM-NOI-6** for noise impacts. The impacts of the proposed Project are limited and not regionally considerable when viewed in connection with other projects (past, current, or future). **Mitigation Measure MM-HYD-1** was recommended in the hydrology and utility analyses to provide a new water well for the Project that would prevent any cumulative impacts for those issues. This Project is consistent with the General Plan Land Use designation for the area and is consistent with the future commercial development on the other undeveloped commercially-designated properties in this immediate vicinity. Any impacts are considered less than significant with the recommended mitigation incorporated. This Project is consistent with the General Plan Land Use designation for the area and is consistent with the future commercial development on the other undeveloped commercially-designated properties in this immediate vicinity. Any impacts are considered less than significant with the recommended mitigation incorporated.

47. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐
---	--------------------------	--------------------------	-------------------------------------	--------------------------

Source(s): Staff Review; Sections 1-44; and Project Plans (**Appendix I**)

Findings of Fact:

Less Than Significant with Mitigation Incorporated

Effects on human beings were evaluated as part of this analysis of this Initial Study and found to be less than significant with implementation of mitigation measures, standard conditions, and/or Project design

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

features in aesthetics, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hydrology & water quality, public services, transportation, tribal cultural resources, and utilities and service systems. Based on the analysis and conclusions in this Initial Study, the proposed Project will not cause substantial adverse effects directly or indirectly to human beings. The EA recommended **Mitigation Measures MM-AQ-1** through **MM-AQ-11** for air quality impacts and **MM-NOI-1** through **MM-NOI-6** for noise impacts. In addition, **Mitigation Measure MM-HYD-1** was recommended in the hydrology and utility analyses to provide a new water well for the Project that would prevent any significant impacts for those issues. Therefore, potential direct and indirect impacts on human beings that result from the proposed Project are considered less than significant with mitigation incorporated.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

VI. EARLIER ANALYSES

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration as per California Code of Regulations, Section 15063 (c) (3) (D). In this case, a brief discussion should identify the following:

Earlier Analyses Used, if any: N/A

VII. SOURCES CITED

Note: All websites were accessed between August of 2020 and May of 2022 by MFCS, Inc. Staff.

Assembly Bill 52

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB52

Assembly Bill 939

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=198919900AB939

California Building Code

<https://up.codes/viewer/california/ca-building-code-2022>

California Code of Regulations

<https://govt.westlaw.com/calregs/Index?transitionType=Default&contextData=%28sc.Default%29>

CalRecycle

<https://calrecycle.ca.gov/>

County of Riverside, Climate Action Plan Update, November 2019

https://planning.rctlma.org/Portals/14/CAP/2019/2019_CAP_Update_Full.pdf

Eastern Municipal Water District *2020 Urban Water Management Plan*

<https://www.emwd.org/post/urban-water-management-plan>

El Sobrante Landfill Annual Monitoring Report

<https://www2.calrecycle.ca.gov/swfacilities/Directory/33-AA-0217>

El Sobrante Landfill Fact Sheet, issued by Waste Management of California

<https://www.wmsolutions.com/locations/details/id/180>

EnviroStor Department of Toxic Substances Control's Hazardous Waste and Substances Site List (Cortese List)

<http://www.envirostor.dtsc.ca.gov>

FEMA

<https://msc.fema.gov>

GeoTracker

<http://geotracker.waterboards.ca.gov>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	---------------------------------------	--------------

Google Maps

<https://maps.google.com>

Health and Safety Code

<https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=HSC&tocTitle=+Health+and+Safety+Code+-+HSC>

Metropolitan Water District *2020 Urban Water Management Plan*

https://www.mwdh2o.com/media/18118/draft_metropolitan_2020_uwmp_march_2021.pdf

mindat.org website

<https://www.mindat.org/loc-3522.html>

Public Resources Code

<https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=PRC&tocTitle=+Public+Resources+Code+-+PRC>

Riverside County Code of Ordinances

https://library.municode.com/ca/riverside_county/codes/code_of_ordinances

Riverside County Department of Waste Resources (RCDWR), Planning Section and Countywide Integrated Waste Management Plan

<http://www.rcwaste.org/business/planning>; and

<http://www.rcwaste.org/business/planning/ciwpmp>

Riverside County General Plan

<https://planning.rctlma.org/General-Plan-Zoning/General-Plan>

Riverside County General Plan Southwest Area Plan

https://planning.rctlma.org/Portals/14/genplan/2019/ap/SWAP_41619.pdf

Riverside County Library System

<http://rivlib.info/riverside-county-library-system/>

Riverside County Transportation Commission

<https://www.rctc.org/>

Southwest Area Plan

<https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-GPA-2022-Compiled-SWAP-4-2022-rev.pdf>

Technical Advisory on Evaluating Transportation Impacts in CEQA

https://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Temecula Valley Unified School District

<https://www.tvusd.k12.ca.us/>

Title 24 building requirements

<https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Title 50, Code of Federal Regulations

<https://www.gpo.gov/fdsys/granule/CFR-2010-title50-vol2/CFR-2010-title50-vol2-sec17-11>

Riverside County Airport Land Use Compatibility Plan Policy Document, April 2010

<http://www.rcaluc.org/Portals/13/15%20-%20Vol.%201%20French%20Valley%20Amd%202011.pdf?ver=2016-08-15-151151-090>

Riverside County General Plan

<https://planning.rctlma.org/General-Plan-Zoning/General-Plan>

Riverside County General Plan EIR

https://planning.rctlma.org/Portals/14/genplan/general_plan_2015/DEIR%20521/DEIR%20No.%20521.pdf

Riverside County Ordinances

<http://www.rivcocob.org/ordinances>

Emails between County EPD and Project Biologist:

From: "Copeland, Don" <dcopelan@RIVCO.ORG>
Date: Wednesday, July 15, 2020 at 9:20 AM
To: Tim Searl <tsearl@searlbio.com>
Cc: Matthew Fagan <matthewfagan@roadrunner.com>
Subject: RE: CUP 190012 HANS 2015 (JPR 10-07-26-01)

Spoke with Ken about it yesterday. County is good with this option. Avoid area and leave 10 foot buffer on each side. This will need to be avoided and documented on the grading plans. Also, deed restriction will need to be placed on this area.

Don Copeland
Contract Biologist
Riverside County Planning
(951) 955-6441
Cell (951) 961-2673
4080 Lemon Street, 12th Floor
Riverside, CA 92501

From: Tim Searl [<mailto:tsearl@searlbio.com>]
Sent: Friday, July 10, 2020 2:06 PM
To: Copeland, Don <dcopelan@RIVCO.ORG>
Cc: Matthew Fagan <matthewfagan@roadrunner.com>
Subject: RE: CUP 190012 HANS 2015 (JPR 10-07-26-01)

Hey Don,

After our discussion regarding the avoidance area, would the attached work on your end? It's a 10-foot buffer on each side of the drainage. Would you require some type of barrier along the boundary? The drainage only ranged from about 3 to 6-inches deep so how high would the bridge need to be designed. I'm not sure how the final grade will be, so I'm not sure how much they'll be raising it up with a pad, if at all. More of an engineering question that I'm assuming I'll get more info on in the near future. Obviously in time, absent of disking, the drainage will become more defined and incised.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Just some initial questions.

Thanks,

Tim Searl, Biologist
Searl Biological Services
43430 E. Florida Ave. #F
PMB 291
Hemet, CA 92544
951.805.2028
www.searlbio.com