June 2025 | Initial Study

TEMECULA VALLEY CHARTER SCHOOL

County of Riverside

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PLACEWORKS

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	average daily traffic
amsl	above mean sea level
AQMP	air quality management plan
AST	aboveground storage tank
BAU	business as usual
bgs	below ground surface
BMP	best management practices
CAA	Clean Air Act
CAFE	corporate average fuel economy
CalARP	California Accidental Release Prevention Program
CalEMA	California Emergency Management Agency
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
cfs	cubic feet per second
CGS	California Geologic Survey
CMP	congestion management program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level

Abbreviations and Acronyms

CO	carbon monoxide
CO_2e	carbon dioxide equivalent
Corps	US Army Corps of Engineers
CSO	combined sewer overflows
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FEMA	Federal Emergency Management Agency
FHA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gases
GWP	global warming potential
HCM	Highway Capacity Manual
HQTA	high quality transit area
HVAC	heating, ventilating, and air conditioning system
IPCC	Intergovernmental Panel on Climate Change
L_{dn}	day-night noise level
L_{eq}	equivalent continuous noise level
LBP	lead-based paint
LCFS	low-carbon fuel standard
LOS	level of service
LST	localized significance thresholds
M_W	moment magnitude
MCL	maximum contaminant level
MEP	maximum extent practicable
mgd	million gallons per day
MMT	million metric tons

Abbreviations and Acronyms

MPO	metropolitan planning organization
MT	metric ton
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O_3	ozone
OES	California Office of Emergency Services
PM	particulate matter
POTW	publicly owned treatment works
ppm	parts per million
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMP	risk management plan
RMS	root mean square
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SIP	state implementation plan
SLM	sound level meter
SoCAB	South Coast Air Basin
SO_X	sulfur oxides
SQMP	stormwater quality management plan
SRA	source receptor area [or state responsibility area]
SUSMP	standard urban stormwater mitigation plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TNM	transportation noise model

Abbreviations and Acronyms

tpd	tons per day
TRI	toxic release inventory
TTCP	traditional tribal cultural places
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WSA	water supply assessment

1. Introduction

1.1 PROJECT OVERVIEW

Temecula Valley Charter School is proposing construction and operation of the new Temecula Valley Charter School campus, which would serve students from TK to eighth grade. Once completed, the school campus would house a total of up to 900 students, 70 school staff, and multiple school buildings and facilities. Other project features and elements include playgrounds, sports courts, and a soccer field; lunch patios and an assembly area; vehicular access and circulation improvements (both on- and offsite); surface parking areas and drive aisles; pedestrian access and circulation improvements; various landscape, hardscape, and lighting improvements; and infrastructure and utility improvements. The discretionary action and approval required for project construction and operation includes a Public Use Permit. The proposed project, including all proposed facilities, supporting improvements, and associated discretionary actions comprise the project described and considered in this Initial Study.

1.2 PURPOSE OF CEQA AND INITIAL STUDY

CEQA (California Environmental Quality Act; Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (14 Cal. Code Regs. Section 15000 et seq.) require that before a lead agency makes a decision to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about and consider the project's potential environmental impacts, inform the public about the project's potential environmental impacts and provide an opportunity to comment on environmental issues, and impose feasible measures to avoid or reduce potential harm to the physical environment.

The County of Riverside (County)—in its capacity as lead agency pursuant to CEQA Guidelines Section 15050—is responsible for preparing environmental documentation in accordance with CEQA to determine if approval of the discretionary actions and subsequent development associated with the proposed project would have a significant impact on the environment. As part of the project's environmental review and in its capacity as lead agency, the County authorized preparation of this Initial Study in accordance with the provisions of CEQA Guidelines Section 15063. Pursuant to Section 15063, the purposes of an Initial Study are to:

- Provide the lead agency information to use as the basis for deciding whether to prepare an environmental impact report (EIR) or negative declaration.
- Enable an applicant or lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to quality for a negative declaration.
- Assist in the preparation of an EIR, if one is required.
- Facilitate environmental assessment early in the design of a project.
- Provide documentation of the factual basis for the finding in a negative declaration that a project will not have a significant effect on the environment.

- Eliminate unnecessary EIRs.
- Determine whether a previously prepared EIR could be used with the project.

As further defined by Section 15063, an Initial Study is prepared to provide the lead agency with information to use as the basis for determining whether an EIR, Negative Declaration, or Mitigated Negative Declaration (MND) would be appropriate for providing the necessary environmental documentation and clearance for the project.

In its preparation of this Initial Study, the County determined that the Initial Study would support the adoption of an MND. An MND is a written statement by the lead agency that briefly describes the reasons why a project that is not exempt from the requirements of CEQA will not have a significant effect on the environment and, therefore, does not require preparation of an EIR (CEQA Guidelines Section 15371). The CEQA Guidelines require preparation of an MND if the Initial Study prepared for a project identifies potentially significant effects, but: 1) revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed MND and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and 2) there is no substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment. (CEQA Guidelines Section 15070[b]).

The County has considered the information in this Initial Study in its decision-making processes. Although the Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and analysis of the County.

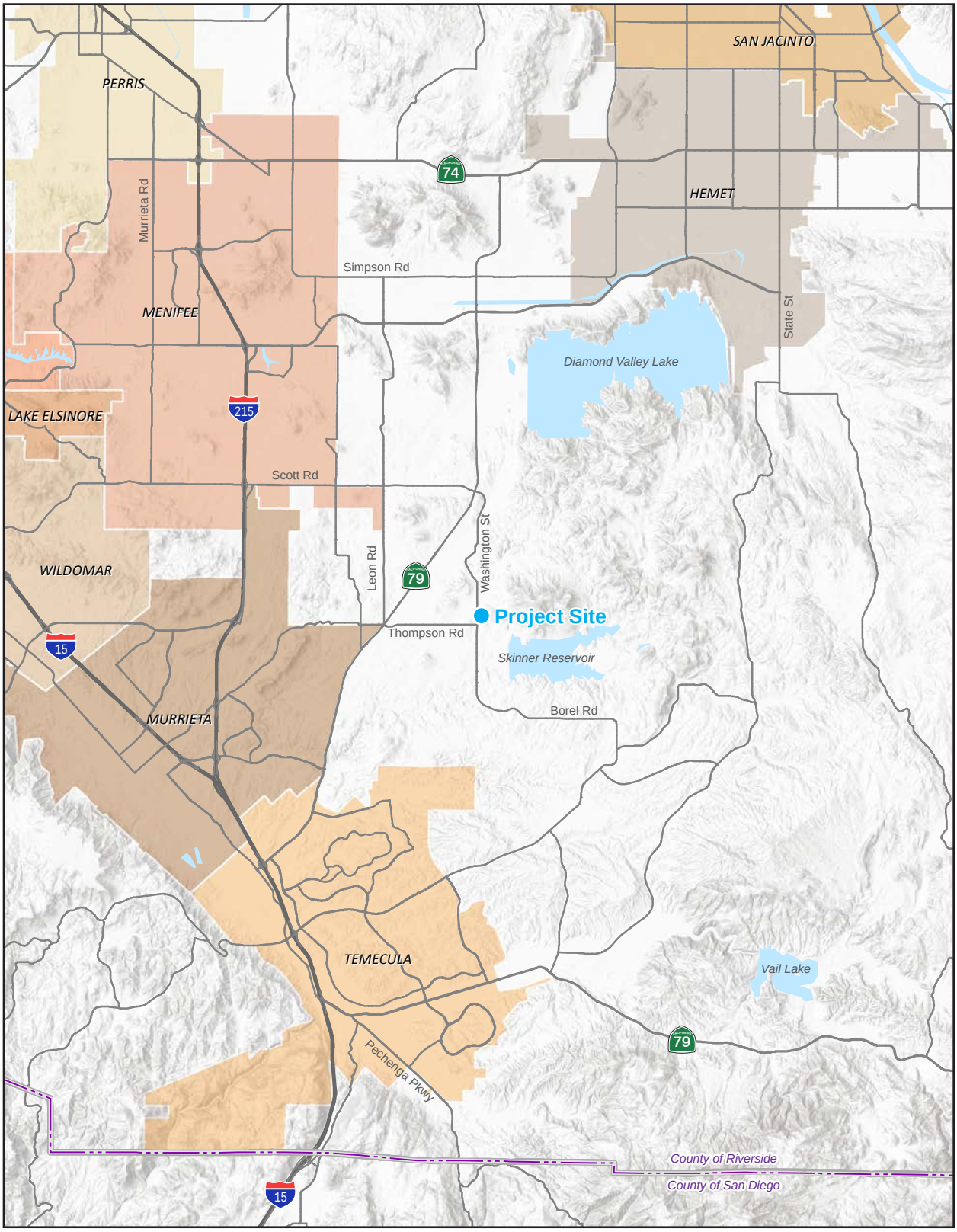
Additionally, this Initial Study includes a Mitigation Monitoring and Reporting Program (MMRP), which was developed to provide a vehicle to monitor mitigation measures outlined in the Initial Study for the project. The MMRP has been prepared in conformance with Section 21081.6 of the Public Resources Code and the County's monitoring requirements. The MMRP will serve to document compliance with adopted/certified mitigation measures that are formulated to minimize impacts associated with the project.

1.3 PROJECT LOCATION

The Project Site is in the unincorporated community of French Valley in western Riverside County. French Valley is surrounded by unincorporated county to the south and east; unincorporated county and the City of Menifee to the northwest; and unincorporated county and the City of Murrieta to the west (Figure 1, *Regional Location*). French Valley is part of the larger San Jacinto Basin, a broad valley interspersed with hills that spans much of western Riverside County. The basin is bounded by the Santa Ana Mountains on the southwest and the San Jacinto Mountains on the northeast. Regional access to the Project Site is from Winchester Road (SR-79), approximately 1.75 miles west via Thompson Road.

The Project Site, which has an address of 35780 Washington Street, consists of 11.99 acres and occupies one parcel (Assessor Parcel Number 472-210-002). As shown on Figures 2, *Local Vicinity*, and 3, *Aerial Photograph*, the Project Site is south of Yates Road and east of Washington Street. The Project Site center point latitude and longitude are 33°36'03.4" North and 117°04'54.9" West, respectively. Local access to the Project Site is via Washington Street.

Figure 1 - Regional Location



Note: Unincorporated county areas are shown in white.

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Figure 2 - Local Vicinity



Project Boundary

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Figure 3 - Aerial Photograph



Project Boundary

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Scale (Feet)

Source: Nearmap 2024.

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1.4 ENVIRONMENTAL SETTING

1.4.1 Existing Land Use and Condition

As shown on Figure 3, *Aerial Photograph*, the Project Site is in a developing area of the County. The Project Site is currently vacant and consists mainly of ruderal vegetation; the northeastern portion is primarily occupied by ornamental trees. There are no building or structures onsite; however, three concrete foundations along the northern end that were related to former residential uses onsite, steel and concrete piers indicating a former mobile home or trailer structure was located on the southeast, one aboveground water tank on the eastern boundary, and electric power poles along the southern boundary. All prior buildings and structures that existed onsite were removed sometime before 2006. The site is relatively flat with gentle slopes (approximately two percent grade) to the northwest with elevations ranging from 1,423 feet to 1,493 feet above mean sea level.

1.4.2 Surrounding Land Use

As shown on Figure 3, the Project Site is generally surrounded by residential development to the north beyond Yates Road, the San Diego Aqueduct (which is owned and operated by Metropolitan Water District) to the east, vacant land to the west across Washington Street, and a single-family home on a large mostly undeveloped property to the south.

1.4.3 Existing General Plan and Zoning

The planning and regulatory plans that govern development and use of the Project Site are the Riverside County General Plan and Land Use Ordinance (County Ordinance No. 348). The development and design standards and regulations in the Land Use Ordinance implement the Riverside County General Plan and constitute the zoning regulations that govern development of the Project Site. According to the Riverside County General Plan, the Project Site is in the Southwest Area Plan. Per the Southwest Area Plan the land use designation of the Project Site is Medium Density Residential (MDR), and the zoning designation is R-1 (One Family Dwelling Zone).

1.4.4 Environmental Resources

The Project Site consists of vacant land and is void of any buildings or structures (see Figure 3). However, three concrete foundations along the northern end that were related to former residential uses onsite, steel and concrete piers indicating a former mobile home or trailer structure was located on the southeast, one aboveground water tank on the eastern boundary, and electric power poles along the southern boundary. Onsite biological resources consist mostly of ruderal habitat and disturbed coastal sage scrub. The Project Site does not contain any historic buildings, housing, scenic resources, mineral resources, or water bodies. Additional information regarding environmental resources on the Project Site and its surroundings—or the lack of such resources—can be found in Section 3, *Environmental Analysis*, of this Initial Study under each respective environmental topic.

1. Introduction

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1.5 PROJECT DESCRIPTION

Following is a detailed description of the proposed project and the various discretionary actions, elements and improvements that will be required to be implemented for the proposed project.

1.5.1 Proposed Land Use

The project applicant (Temecula Valley Charter School) is proposing construction and operation of the new Temecula Valley Charter School campus (Project), which would serve students from TK to eighth grade. Once completed, the school campus will house a total of up to 900 students, 70 school staff, and multiple school buildings and facilities. The Project involves relocation of the charter school's existing campus (including the students and staff), which currently operates from 35755 to 35777 Abelia Street in Riverside County, approximately 800 feet to the northwest (see Figure 3, *Aerial Photograph*), to the new campus.

As shown on Figure 4, *Conceptual Site Plan*, the new school campus would occupy the entire Project Site. The Project would be designed as a contemporary TK to eighth charter school. The proposed site design follows the natural contours of the vacant Project Site and its surroundings; the site design includes raising the school campus above the street grade of Washington Street. The site layout and design elements (i.e., provision of a substantial building setback and a solid landscaped edge condition) provide a buffer between the proposed buildings and the surrounding streets and residences; they also create a protected area separate from the surrounding streets and parking lots for the children's sport courts and gathering and recreation areas. The Project's design places emphasis on maintaining a relationship with surrounding residences while also generating a distinct school identity.

The main school building, which is in the form of an elongated rectangle (see Figure 4), would be constructed as a concrete tilt-up building and placed in the western end of the Project Site with frontage onto Washington Street and Yates Road. Its placement would ensure that the primary view of the new campus is the main school building. The main entrance to the school building would be from the middle of the building, which faces the internal school campus The main building is one story with varied heights and comprises 17,292 square-feet of floor space featuring the multipurpose room, school kitchen, science room, performing arts room, science room, food services, restroom and storage rooms, and administrative offices and main lobby/reception area. The portion of the building that would be occupied by the multipurpose and performing arts room would be the tallest element of the building (34 feet tall), as it would feature a high ceiling for the proposed indoor basketball court. Aside from basketball games, the multipurpose room would host other sporting and special events, such as assemblies and graduation ceremonies.

As shown on Figure 4, aside from the main building, there would be 29 modular buildings (two to be constructed in phase two) that would be used as classrooms (ranging in size from 960 to 1,440 square feet each), four 480 square-foot modular buildings that would be used for restrooms, six 960 square-foot modular storage units, and an enclosed solid waste enclosure. The modular buildings would serve as classrooms for TK to eighth graders as well as the library, art, music, tutoring and special education and would be developed as single or double modular classroom buildings. In total, the buildings on campus would total 53,992 square feet of building area.

1. Introduction

As illustrated on Figure 4, placement of the main building, modular buildings, and proposed landscaping would provide a visual and physical buffer between the internal campus areas and the traffic activities along Yates Road and Washington Street as well as the from residential neighborhood to the north across Yates Roads. All roof-mounted mechanical equipment would be completely shielded from public view via rooftop equipment screens.

Other Project components, which are described in more detail below, include campus amenities and facilities; vehicular access and circulation improvements (both on- and offsite); surface parking areas and drive aisles; pedestrian access and circulation improvements; various landscape, hardscape, and lighting improvements; and infrastructure and utility improvements.

Project development would require County approval and issuance of a Public Use Permit, which is described in more detail in Section 1.6.1, *Discretionary Actions and Approvals*.

1.5.2 Architectural Design and Character

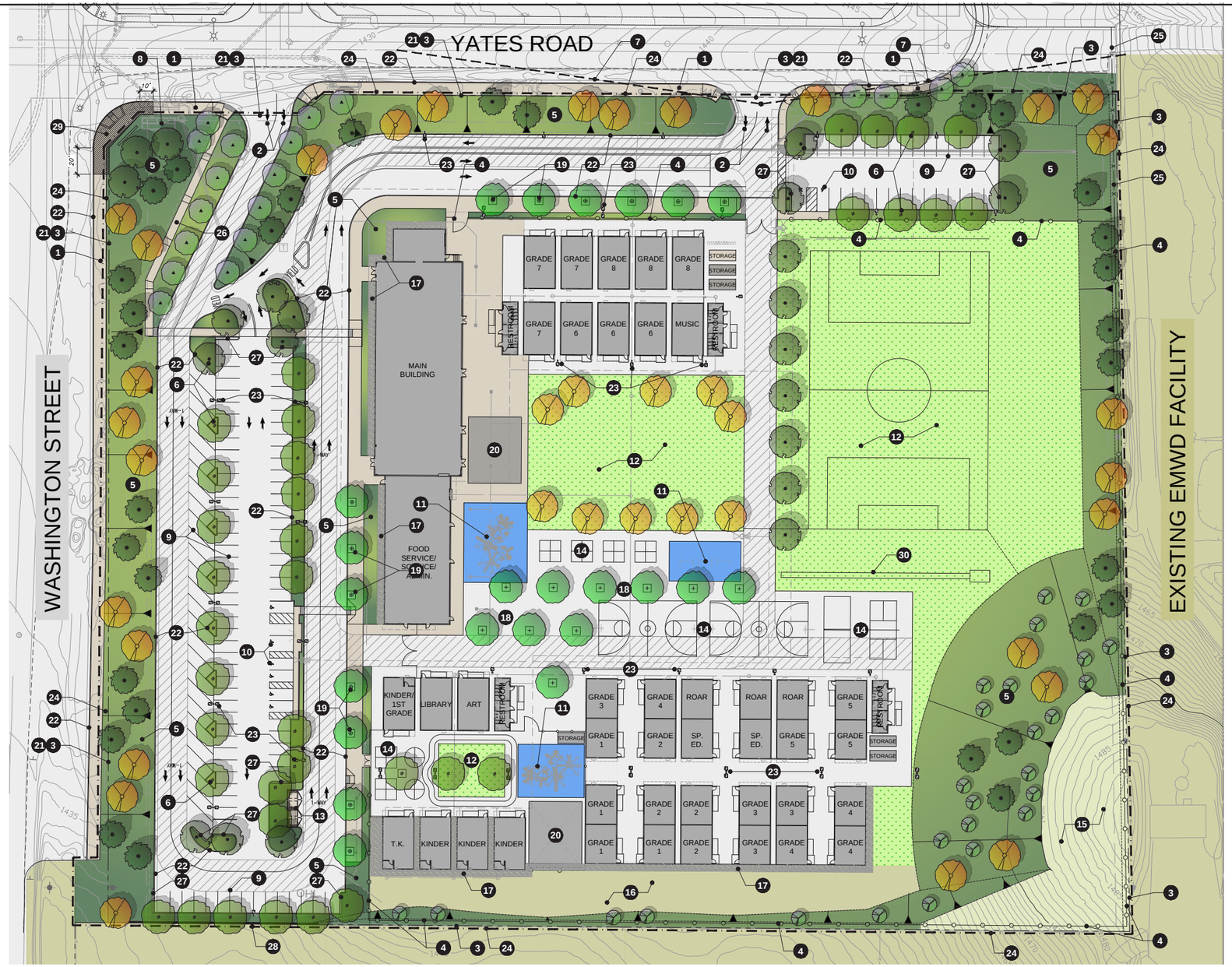
Project development would include construction of school buildings and structures as well as various site features and improvements. As shown on Figure 4, *Conceptual Site Plan*, the school campus would feature a main building and 29 modular classroom buildings (two to be constructed in phase two), as well as four modular restroom buildings, a trash enclosure, and modular storage units. Architecturally and functionally, the elongated rectangular-shaped main building would be designed and constructed as a single-story building. The modular buildings would be single-story in height and be placed east of the main building. The trash enclosure would be a stand-alone, semi-enclosed structure.

Figures 5, *Main Building Elevations*, and 6, *Modular Building Elevations*, illustrate the conceptual elevations and architectural design and features of the proposed buildings. As shown in these figures, the buildings would incorporate a contemporary architectural style and aesthetic design, which express the buildings educational use and purpose. The final architectural style and aesthetic design of the buildings is subject to review and approval by the County.

As illustrated on Figure 5, features and materials of the main school building include natural and painted concrete walls in four color schemes; high-performance tinted glazing (windows and doors); painted aluminum store front; and painted aluminum/steel awnings for shading. The massing of the building is broken up and varied to allow for a human-scale design. The building has also been designed to have multiple-feature elements on all façades. Building pop-outs, offsets, overhangs, recesses, and variations in building materials and colors would be added to offset the building's massing and provide relief to and variation in the building form and style. For example, the parapet heights would be varied for visual interest and breaking up the massing. Building entries would be articulated through the use of varied building materials and colors. The building's shapes and stylistic character mimic the rest of the Project design.

Also, the proposed solid waste enclosure would be designed and constructed to be architecturally compatible with the proposed building design. It would include concrete walls on three sides, swinging metal doors on one side for access, and an overhead aluminum/steel canopy.

Figure 4 - Conceptual Site Plan



1. PUBLIC SIDEWALK
2. ENTRY & EXITS
3. PROPERTY LINE
4. PERIMETER FENCE
5. DROUGHT TOLERANT SHRUB PLANTING
6. PARKING SHADE TREES
7. SITE DISTANCE LINE OF SIGHT
8. BIO-FILTRATION PLANTER
9. PARKING STALLS
10. ADA PARKING STALLS
11. PLAY STRUCTURES WITH SAFETY SURFACING
12. SEEDED GRASS FIELDS AND PLAY AREAS
13. TRASH ENCLOSURE
14. PLAY COURTS
15. NATIVE VEGETATION
16. MULCH AREA
17. 5 FT. NON-COMBUSTIBLE GROUNDCOVER
18. SHADE TREES IN 6 FT. SQ. PLANTERS
19. SHADE TREES IN PLANTERS OR TREE GRATES AT DROP-OFF
20. OVERHEAD SHADE CANOPIES
21. RIGHT OF WAY
22. CONCRETE CURB
23. ON-SITE LIGHT POLES
24. LIMIT OF WORK
25. EXISTING FENCE AND GATE
26. CONCRETE RAMP WITH HANDRAILS TO RIGHT OF WAY
27. 12" WIDE CONCRETE WALKWAY STRIP AT PARKING STALLS.
28. RETAINING WALL.
29. TREE EXCLUSION ZONE PER COUNTY STANDARD 1101.
30. 40 METER SPRINT OVERLAY.

PLANT SCHEDULE

TREES

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE / FORM
	PROSOPIS CHILENSIS	CHILEAN MESQUITE	15 GAL. STD.
	FRAXINUS VELUTINA	ARIZONA ASH	24" BOX STD.
	FRAXINUS VELUTINA	ARIZONA ASH	15 GAL. STD.
	LAGERSTROEMIA FAURIEI 'TUSCARORA'	TUSCARORA CRAPE MYRTLE	15 GAL. STD.
	PISTACIA CHINENSIS	CHINESE PISTACHE	36" BOX STD.
	QUERCUS SUBER	CORK OAK	24" BOX STD.
	ULMUS PARVIFOLIA 'TRUE GREEN'	TRUE GREEN CHINESE ELM	24" BOX STD.

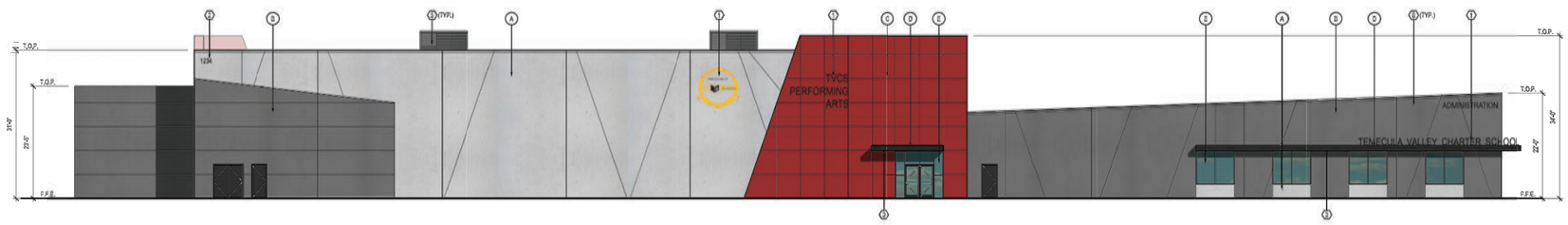
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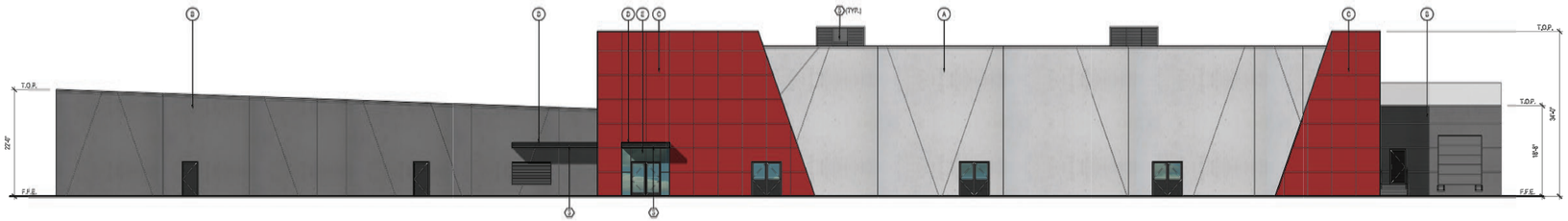
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Figure 5 - Main Building Elevations



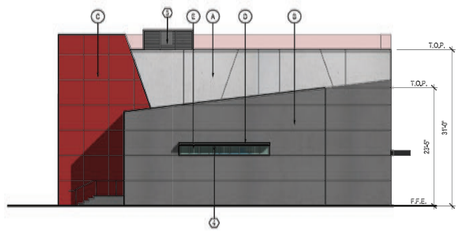
WEST ELEVATION



EAST ELEVATION



SOUTH ELEVATION



NORTH ELEVATION

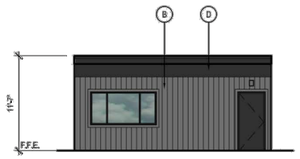
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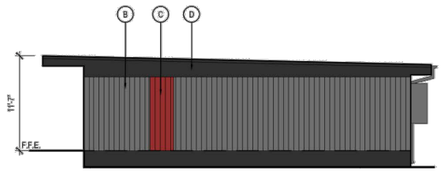
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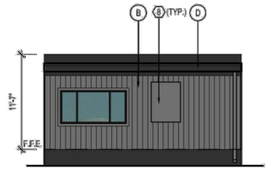
Figure 6 - Modular Building Elevations



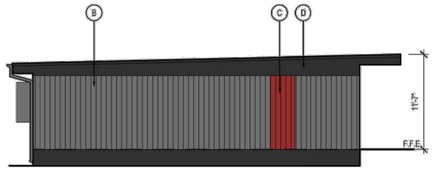
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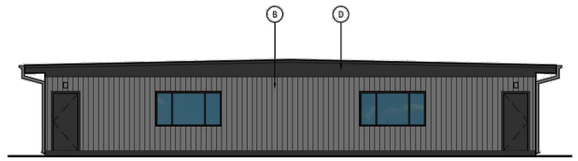


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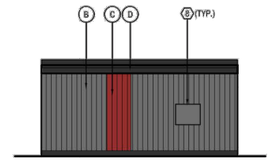


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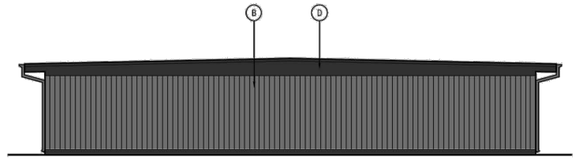
TYPICAL SINGLE MODULAR CLASSROOM



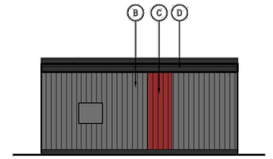
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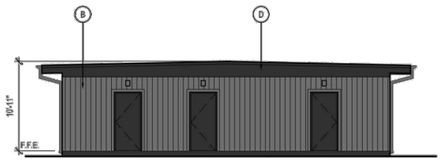


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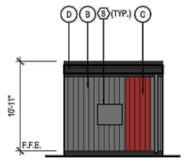


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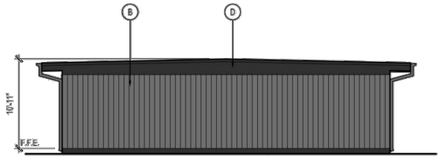
TYPICAL DOUBLE MODULAR CLASSROOM



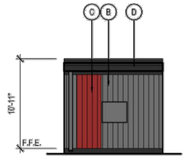
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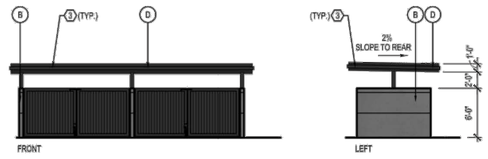


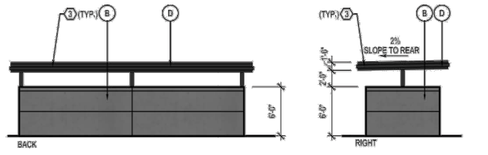
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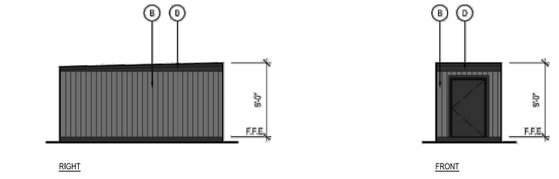
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TYPICAL MODULAR RESTROOM





TRASH ENCLOSURE



TYPICAL MODULAR STORAGE

0 20
Scale (Feet)

Source: Kirk Moeller Architects, Inc 2024.

1. Introduction

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1.5.3 Campus Amenities and Facilities

As shown on Figure 4, the school campus amenities would include a lunch patio and assembly area, natural turf areas, playgrounds with play structures (separate playgrounds would be provided for kindergarten and elementary and middle school students), sport courts (e.g., ball wall, pickleball), a long jump track, and a natural turf soccer field. A dedicated and enclosed kinder playground and lunch patio would be located south of the main building. The main school building would include a multipurpose room that would include a basketball court, as well as a performing arts room. One of the modular buildings just south of the main school building would house the school library.

Campus facilities include janitorial and storage rooms within the main building and a modular storage unit that would be provided near the modular classrooms. Also, an enclosure that would accommodate individual trash bins for solid waste, recyclable materials, and food waste would be provided near the southwestern end of the school campus, toward the southern end of the main drive aisle.

1.5.4 Landscaping, Fences, and Lighting

1.5.4.1 LANDSCAPING

The Project's landscape plan would feature landscaping along the campus perimeter and internal to the proposed campus, including along the building edges, within the parking areas and campus courtyards, and as a part of the natural turf areas and playfields (see Figure 4). The site landscaping would include a variety of ornamental trees, shrubs, and groundcover that would help soften the massing of the buildings and various hardscape improvements (e.g., parking areas, drive aisles, walkways) and help provide visual relief for the Project. Also, as shown on Figure 4, an area for the planting of native vegetation would be provided in the southeastern end of the Project Site. All proposed landscaping within the project site would adhere to the County water efficiency landscaping requirements, which sets requirements to submit landscape documents, a landscaping irrigation and maintenance schedule to achieve a statewide reduction of portable urban water usage (Ordinance No. 859).

1.5.4.2 FENCES AND GATES

As shown on Figure 7, *Proposed Fence and Gate Plan*, various fences and gates would be provided along the campus perimeter and internal to the site to provide a secure and safe environment for future students and staff. A six-foot high tubular steel fence would be provided along the entire perimeter of the campus area, separating the school buildings and play areas and courts from the parking and circulation areas of the Project Site. Pedestrian access onto the campus would be provided at the corner of Washington Stret and Yates Road and on Yates Road easterly of the main building. In addition, access to the exclusive kindergarten area would be provided via a pedestrian gate just south of the main school building.

Emergency vehicle access to the internal fire access lane, which would loop around the campus, would be provided via swinging metal gates near the eastern driveway along Yates Road and just south of the main building and north of the kindergarten area (see Figure 7).

The proposed solid waste enclosure would include solid walls on three sides and swinging metal doors on the side facing the internal drive aisle toward the east and away from public views along Washington Street. The enclosure would also be landscaped on three sides to help screen it.

1.5.4.3 LIGHTING

Project lighting would consist of exterior building-mounted light fixtures; interior lighting for the new buildings; lighting for pedestrian walkways and common gathering areas; ground-mounted decorative lighting for landscape and architectural features; lighting for the parking areas and drive aisles; security lighting; and streetlights along Yates Road and Washington Street. No lighting is proposed for the natural turf soccer field.

1.5.5 Access, Circulation, and Parking

1.5.5.1 VEHICULAR ACCESS, CIRCULATION, AND PARKING

Vehicular Access and Circulation

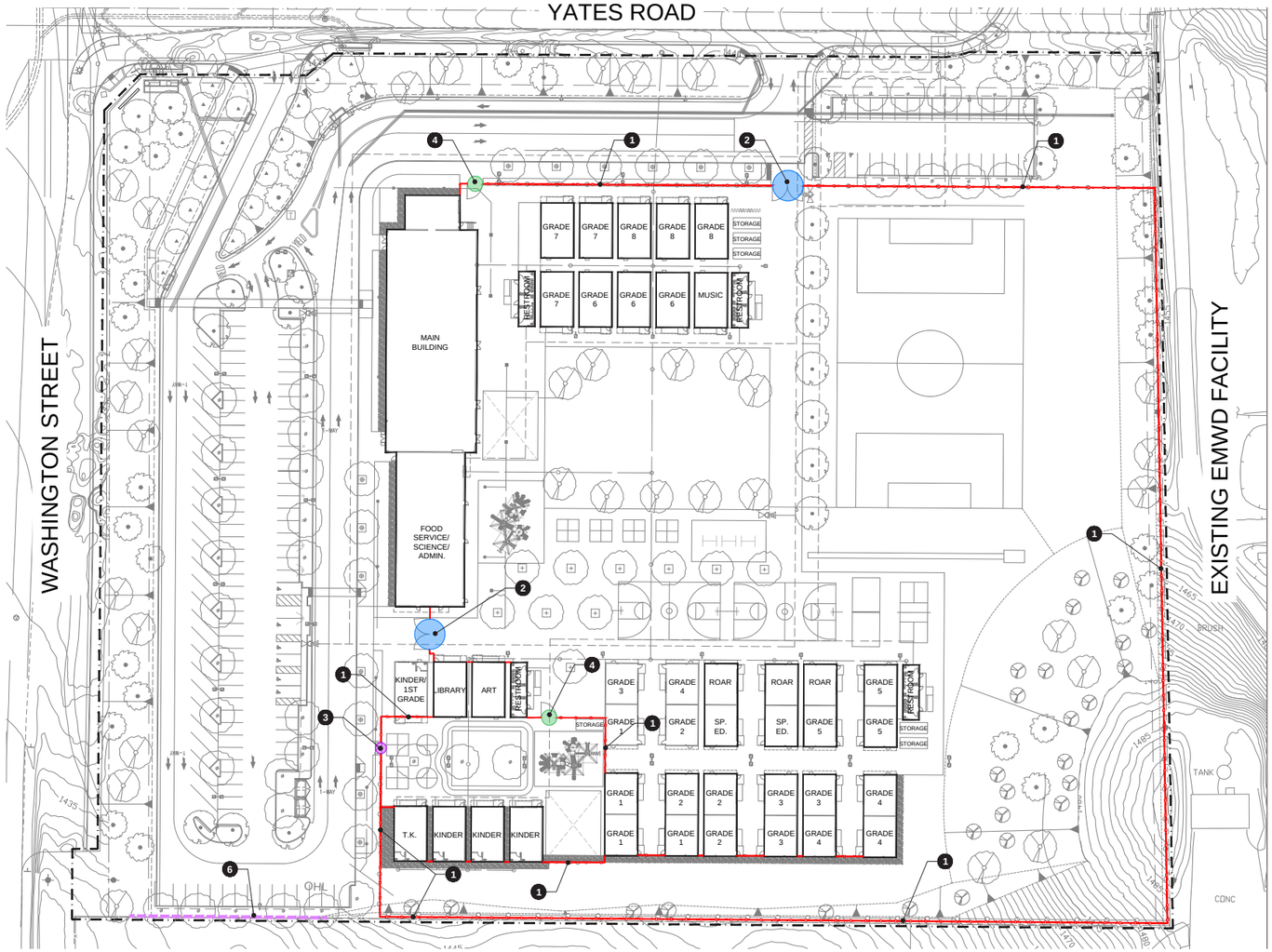
Vehicular access to the Project Site would be provided via two driveways, both proposed along Yates Road. The western driveway would operate as an ingress-only driveway, and the eastern driveway would operate as a full-access driveway (all turning movements allowed). The driveways would connect to the internal drive aisle system, which would connect to the internal parking areas, serve as the student drop-off/pick-up circulation feature, and serve as the fire access lane.

During the student drop-off (morning) and pick-up (afternoon) times, both driveways would serve the parents arriving to and leaving the campus. During the morning drop-off and afternoon pick-up hours, cars entering the Yates Road driveways would be directed to the western driveway, driving south along the parking area drive aisle to the drop-off/pick-up zone. Upon dropping off students in the designated loading zone, parents would be directed to exit the campus via the eastern driveway on Yates Road.

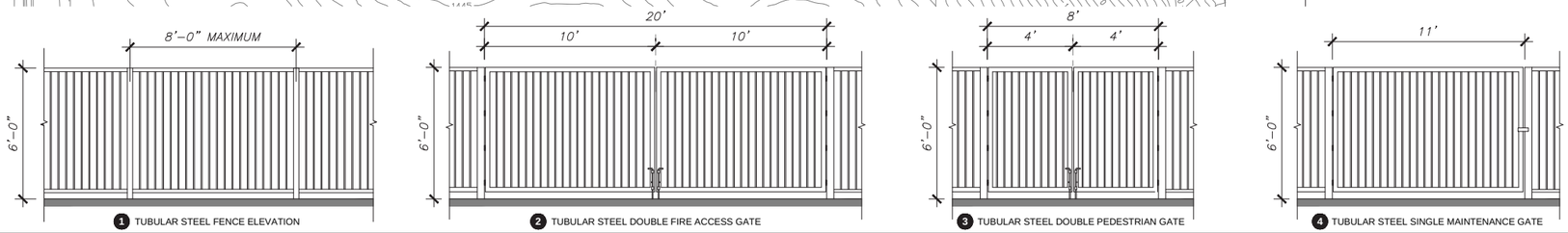
Emergency vehicles would have access to the Project Site through both driveways along Yates Road, which connect to the internal drive aisle system and fire access lane. As shown on Figure 4, *Conceptual Site Plan*, the fire access lane would loop around the drive aisles with two entrances into the campus near the southern end of the main building and another near the eastern driveway, just west of the turf soccer field. Knox Boxes[1] (or other approved means of emergency access to the site) would be provided for the gates to provide access for emergency personnel.

[1] A Knox Box is a small, wall-mounted safe that holds building keys for fire departments, emergency medical services, and sometimes for sheriff's to retrieve in emergency situations.

Figure 7 - Proposed Fence and Gate Plan



1. 6 FT. TALL PAINTED TUBULAR STEEL FENCE
2. 6 FT. TALL PAINTED TUBULAR STEEL DOUBLE FIRE ACCESS GATE
3. 6 FT. TALL PAINTED TUBULAR STEEL DOUBLE PEDESTRIAN GATE
4. 6 FT. TALL PAINTED TUBULAR STEEL SINGLE MAINTENANCE GATE
5. CMU BLOCK RETAINING WALL BY CIVIL ENGINEERING.



1 TUBULAR STEEL FENCE ELEVATION
2 TUBULAR STEEL DOUBLE FIRE ACCESS GATE
3 TUBULAR STEEL DOUBLE PEDESTRIAN GATE
4 TUBULAR STEEL SINGLE MAINTENANCE GATE

0 100
Scale (Feet)

Source: Kirk Moeller Architects, Inc 2025.

1. Introduction

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As a part of the Project, several roadway improvements would be implemented along Yates Road and Washington Street, which are public streets that are owned and maintained by the County. Improvements include constructing the roadways to their ultimate right-of-way width along the portion of Yates Road that abuts the northern boundary of the Project Site, and along the portion of Washington Street that abuts the western boundary of site. The improvements include roadway pavement for the additional travel lanes, a dedicated right-turn lane (along Washington Street only), curbs and gutters, driveways (along Yates Road only), and sidewalks. All roadway improvements would be designed and constructed per County standards and once completed, would be owned and maintained by the County.

Parking

Parking for school employees and visitors would be provided onsite in the parking areas proposed in the western and northeastern portions of the Project Site. Pursuant to the provisions of the Riverside County Land Use Ordinance, 148 parking spaces are required to accommodate the Project and 148 spaces would be provided. As proposed, 32 parking spaces are dedicated to staff and 116 parking spaces are dedicated to parents and visitors. Additionally, pursuant to the provisions of the Riverside County Land Use Ordinance (County Ordinance No. 348) and the most current (2022) California Green Building Standards Code (CALGreen; Title 24, California Code of Regulations, Part 11), which are codified in County Ordinance No. 457 , parking spaces for handicap (total of 7) and clean-air vehicles (total of 33) would be provided among the 148 spaces, with the 33 clean-air vehicle spaces set aside for electric vehicle charging.

1.5.5.2 PEDESTRIAN ACCESS AND CIRCULATION

As shown on Figure 4, *Conceptual Site Plan*, pedestrian access to the school campus would be provided via a curb-adjacent public sidewalk along Yates Road, which forms the Project Site's northern boundary. A public sidewalk would also be provided along Washington Street, which forms the Project Site's western boundary. Currently, there is no sidewalk along the side of Yates Road or Washington Street that abuts the Project Site. The new public sidewalks, which would be constructed in conjunction with the Yates Road and Washington Street roadway improvements (discussed above), would connect to the internal walkway system of the school campus near the northeastern end of the Project Site (see Figure 4). The walkways would provide a means for school children, staff, personnel and visitors to conveniently and safely access the school campus.

1.5.5.3 BICYCLE ACCESS AND CIRCULATION

Under existing conditions there is a striped bicycle lane along Washington Street (which forms the Project Site's western boundary) near the northwestern corner of the Project Site. The bicycle lane commences at the Washington Street and Yates Road intersection and runs south along Washington Street for approximately 50 feet. The striped bicycle lane continues north along Washington Street beyond Yates Road where it currently terminates at the intersection of Washington Street and Autum Glen Circle. The on-street bicycle lane is part of the Regional Trail designated along the entire stretch of Washington Street in Figure 8, Southwest Area Plan Trails and Bikeway System, of the Southwest Area Plan.

As noted above, several roadway improvements would be implemented along Washington Street under the Project. Improvements include constructing the roadway to its ultimate right-of-way width along the portion

of Washington Street that abuts the western boundary of Project Site. In addition to the roadway improvements discussed earlier, the existing striped bicycle lane on Washington Street would be extended southerly from the existing termination point (approximately 50 feet south of the Washington Street and Yates Road intersection) and end near the southwestern end of the Project Site boundary. Bicyclists are also allowed to ride on roads without dedicated bicycle lanes. Furthermore, Section 21100(h) of the California Vehicle Code allows bicyclists to ride on sidewalks.

Additionally, Project implementation would include bicycle parking spaces onsite in accordance with the provisions of Section 18.12 (Off-Street Vehicle Parking Standard), Section 18.12 (f)(2)(d) (Bicycle Parking Facilities) of the County Land Use Ordinance (County Ordinance No. 348). The bicycle racks would be placed in designated areas near the main entrance of the proposed school building, abutting the 8th grade modular buildings, and in an interior storage room in the multipurpose room. The bicycle racks and storage would be for school employees and students.

1.5.6 Infrastructure Improvements and Utility and Service Systems

1.5.6.1 WATER SYSTEM

The Eastern Municipal Water District (EMWD) would provide water delivery service to the Project Site. EMWD supplies include local groundwater, recycled water and imported water from Metropolitan. As a part of the Project, new onsite water lines would connect to the 12-inch water main in Yates Road. No new offsite water line construction or upsizing would be required to accommodate the Project. However, some construction would occur within the public right-of-way of Yates Road to make the necessary infrastructure connections to the existing water main. The proposed water system improvements would be designed and constructed in accordance with County and EMWD requirements and would require County approval. Additionally, fire hydrants would be installed onsite pursuant to the requirements of the Riverside County Fire Department to ensure adequate fire protection infrastructure. The fire hydrants would connect to the new onsite water lines.

1.5.6.2 WASTEWATER SYSTEM

Wastewater generated by the Project would be collected by EMWD and treated at the Temecula Valley Regional Water Reclamation Facility. As a part of the Project, new onsite sewer lines would connect to the existing 8-inch sewer main in Yates Road. No offsite sewer line construction or upsizing would be required to accommodate the Project. However, some construction would occur within the public right-of-way of Yates Road to make the necessary infrastructure connections to the existing sewer main. The proposed wastewater system improvements would be designed and constructed in accordance with EMWD and the County's standards and would require County approval.

1.5.6.3 DRAINAGE SYSTEM

As shown on Figure 3, *Aerial Photograph*, the Project Site consists of vacant land. Under existing conditions, the Project Site has zero percent impervious surface area. The site is relatively flat with gentle slopes draining northerly and westerly (via sheet flow) to the northwesterly corner of the Project Site at the corner of Yates

Road and Washington Street. There are no drainage improvements onsite under existing conditions; there are also no water quality devices/features onsite to provide any treatment for "first flush" generated onsite. Further, there are no curb-and-gutter improvements along any of the streets that front onto the Project Site.

Under proposed conditions and upon Project completion, the Project Site would be developed with impervious (e.g., buildings, asphalt parking, hardcourts) and pervious (e.g., playfield, open lawn areas) surfaces. Also, part of the roadway improvements proposed along Washington Street and Yates Road would include curb and gutter improvements. Site runoff from the Project Site would be conveyed similar to existing conditions, continuing to flow westerly via a comprehensive onsite drainage collection, conveyance, and treatment system. Stormwater runoff generated onsite would drain via paved surfaces and curb gutters to proposed swales that drain to a large underground detention structure proposed in the parking area of the Project Site, just west of the main building. The swales would be provided along the entire stretch of the southern boundary of the campus, which would eventually connect to the proposed underground detention structure. The underground detention structure would be sized to retain the difference in generated stormwater volume from the 10- and 100-year storms as well as for hydromodification purposes. Runoff conveyed to the underground detention structure would be treated and infiltrated.

Additionally, and as described earlier, Yates Road and Washington Street would be improved as a part of the Project. The addition of impervious area within the right-of-way of these roadways would be mitigated by the proposed onsite stormwater retention and infiltration system, as there would be more than adequate capacity in the retention basin to accommodate the runoff generated by these roadway improvements.

The proposed drainage system improvements would be designed and constructed in accordance with County requirements and would require County approval.

1.5.6.4 SOLID WASTE AND RECYCLING

Solid waste and recycling generated by the Project would be collected and hauled away by CR&R Environmental Services and transported to/disposed of at the appropriate waste and recycling facilities (e.g., Badlands Sanitary Landfill, El Sobrante Landfill, and Lamb Canyon Sanitary Landfill). An enclosure with swinging gates that would accommodate bins for solid waste, organic waste, and recyclable materials would be provided near the southwestern end of the Project Site, along the southern end of the drive aisle.

1.5.6.5 UTILITIES AND SERVICE SYSTEMS

Plans for utilities and service systems that would serve the Project include provision of electricity (Southern California Edison), natural gas (Southern California Gas Company), and telecommunications (Verizon). All modification of, and connection to, existing utility and service systems would be accommodated consistent with County and service providers requirements. Also, all new utility infrastructure would be installed underground or placed in enclosed spaces (e.g., utility closets).

1. Introduction

1.5.6.6 OPERATIONAL CHARACTERISTICS

Schools Hours and Calendar

Based on the proposed construction timeline (see Section 1.5.10, *Project Phasing and Construction*), it is anticipated that the new campus would be operational during the 2025-2026 school year, which commences in early August 2025. However, it should be noted that since Project construction would not be completed until the end of 2025, the school would commence operations during the middle of the school year (start of 2026). School campus hours would be from 8:10 am to 3:00 pm for student instruction, from Monday through Friday during normal school months, which is the second week of August through the last week of May. However, school staff and personnel typically arrive earlier and stay later than the programmed school hours. Student drop off times would be from 7:45 am until 8:10 am. Also, there would be after school programs, which means that pick up times for students participating in these programs would range from 3:15 pm until 6:00 pm. Occasional events would deviate from the standard hours.

The campus would be closed on weekends and holidays unless a special event is scheduled. During normal school months, there would be at least 31 holidays and faculty in-service days when school is not in session. On the faculty in-service days, the campus traffic is reduced to staff use only. During the holidays, the entire campus would be closed with no activity taking place. During the summer months/vacation, the school campus would be closed.

Students and Staffing

Once completed, the new campus would be home to a total of up to 900 school students from grades TK to eighth. The school would have a staff of approximately 60 people, which would include teachers, administration, and maintenance. It should be noted that the student and staff count may fluctuate from year to year, depending on the number of students that enroll each school year.

1.5.6.7 GREEN BUILDING STANDARDS

According to the US Green Building Council, green building is the practice of designing, constructing and operating buildings to maximize occupant health and productivity, use fewer resources, reduce waste and negative environmental impacts, and decrease life cycle costs (ACI 2020). The Project would be designed and constructed using green building practices, including those of the most current California Building Energy Efficiency Standards (Title 24, California Code of Regulations, Part 6) and CALGreen (Title 24, California Code of Regulations, Part 11). The Building Energy Efficiency Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. CALGreen is California's statewide "green" building code. Its purpose is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts that have a reduced negative impact or positive environmental impact and by encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, water conservation and resource efficiency, and environmental quality.

As proposed, Project development would include mandatory standards from CALGreen Divisions 5.1, Planning and Design; 5.2, Energy Efficiency; 5.3, Water Efficiency and Conservation; 5.4, Material Conservation and Resource Efficiency; and 5.5, Environmental Quality. Some of the specific green building standards include but are not limited to:

- Bicycle parking
- Building commissioning
- Designated parking for clean air vehicles
- Electric vehicle charging (facilitate future installation of electric vehicle supply equipment)
- Light-pollution reduction
- Water-conserving plumbing fixtures and fittings
- Outdoor water usage conservation
- Construction waste reduction, disposal, and recycling
- Recycling by occupant
- Finish-material-pollutant control

1.5.7 Project Phasing and Construction

Upon County approval, Project development is anticipated to be completed in three general development phases: clearing, grading, and construction. Overall construction is estimated to take approximately nine months, commencing in Fall 2025. No soil import or export would be required as the site is expected to balance. The types and numbers of construction equipment expected to be used during construction activities are summarized in Section 3.3, *Air Quality*. All construction staging activities and areas would occur within the confines of the Project Site. Based on the proposed construction timeline, it is anticipated that the Project would be operational by Winter 2025.

1.6 COUNTY ACTION REQUESTED

1.6.1 Discretionary Actions and Approvals

Under CEQA Guidelines Section 15357, a discretionary action means a project that calls for an exercise of judgment or deliberation when the public agency (for the Project, the public agency is the County of Riverside) decides to approve or disapprove a particular activity, as distinguished from situations where the public agency or body merely has to determine whether there has been conformity with applicable statutes, ordinances, regulations, or other fixed standards. Hesperia is the lead agency under CEQA and has the principal approval authority over the Project. Following is a list of the discretionary actions and approvals required for Project implementation.

- Adoption of a Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program.
- Approval of a Public Use Permit (PUP No. 230001)

Additionally, County review of the Project would produce a comprehensive set of draft conditions of approval that would be available for public review prior to consideration of the Project for approval by the County's

decision-making body. If approved, the Project would be required to comply with all imposed conditions of approval.

1.6.2 Non-Discretionary Actions and Approvals

Under CEQA Guidelines Section 15369, non-discretionary or ministerial actions or approvals are those that involve little or no discretion (e.g., connections to utility infrastructure), merely apply a checklist or clear requirements to the facts as presented and are often issued over the counter by a county or city staff. These actions or approval are ones that require only conformance with a fixed standard or objective measurement and requires little or no personal judgment by a government agency as to the wisdom or manner of carrying out the action. Generally, non-discretionary or ministerial permits require a public official to determine only that the project conforms with applicable zoning and building code requirements and that applicable fees have been paid. Following is a list of the nondiscretionary/ministerial actions and approvals required for Project implementation.

- Approval and issuance of grading and building permits.
- Approvals for water, sewer, and storm drain infrastructure improvements in the public right-of-way.
- Approval of any roadway improvements and closures that may be needed to implement the improvements.
- Approval and issuance of certificates of occupancy.

1.7 INCORPORATION BY REFERENCE

- **2015 Riverside County General Plan.** The Riverside County General Plan is a policy document designed to give long-range guidance and direction for decisions affecting the future character of the County and its community. It represents the blueprint for the future of Riverside County and describes anticipated future growth, development, and environmental management programs over the long term. The Riverside County General Plan was used throughout this Initial Study as the fundamental planning document governing development on the Project Site.
- **2015 Riverside County General Plan Environmental Impact Report**. The 2015 Riverside County General Plan Environmental Impact Report (EIR) evaluated the proposed plan's effect on the physical environment as it is now, and the impact on the environment that would exist under the proposed plan, including secondary and cumulative effects. The findings, conclusions and mitigation measures of EIR were used throughout this Initial Study, as needed.
- **Riverside County Land Use (Zoning) Ordinance.** The Riverside County Land Use Ordinance (Ordinances No. 348) is the regulating tool that the County uses to implement the Riverside County General Plan; it establishes the basic regulations under which land in unincorporated Riverside County is developed and utilized. This includes but is not limited to regulations and controls for the design and improvement of development sites, allowable uses, building setback and height requirements, and other development standards. The basic intent of the ordinance is to promote and protect the public health, safety, convenience, and welfare of present and future citizens of Riverside County. The Riverside County Land Use Ordinance was used throughout this Initial Study as the fundamental regulatory document governing development on the Project Site.

2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** Temecula Valley Charter School

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

3. **Contact Person and Phone Number:**
   Haide Aguirre, TLMA Contract Planner
   951.955.1006

4. **Project Location:** The Project Site, which has an address of 35780 Washington Street, consists of 11.99 (Assessor Parcel Number 472-210-002) acres south of Yates Road and east of Washington Street.

5. **Project Sponsor's Name and Address:**
   Temecula Valley Charter School
   35755 Abelia St
   Winchester, CA 92596

6. **General Plan Designation:** Medium Density Residential (MDR)

7. **Zoning:** R-1 (One Family Dwelling Zone)

8. **Description of Project:** Temecula Valley Charter School is proposing construction and operation of the new Temecula Valley Charter School campus, which would serve students from TK to eighth grade. Once completed, the school campus would house a total of up to 900 students, 70 school staff, and multiple school buildings and facilities. Refer to Section 1.5, *Project Description*, for a more detailed description of the project.

9. **Surrounding Land Uses and Setting:** The Project Site is generally surrounded by residential development to the north beyond Yates Road, the San Diego Aqueduct to the east, vacant land to the west across Washington Street, and a single-family home on a large property to the south.

10. **Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement):** Not applicable

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

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

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

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

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

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

Naide Aguirre — *Signature*

6/23/2025 — *Date*

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5. 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. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) **Earlier Analyses Used.** Identify and state where they are available for review.

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

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

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

2. Environmental Checklist

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

9. The explanation of each issue should identify:

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

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
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?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			X	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			X	
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?		X		

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
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?				X

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				X
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?				X
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?			X	
Police protection?			X	
Schools?				X
Parks?				X
Other public facilities?				X
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?			X	
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				X
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			**X**	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			**X**	
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				**X**
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?				**X**
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?				**X**
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?				**X**
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		**x**		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			**x**	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			**x**	

3. Environmental Analysis

Section 2.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if applicable.

3.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. For purposes of determining significance under CEQA, a scenic vista is generally considered a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Some scenic vistas are officially designated by public agencies, or informally designated by tourist guides. Vistas provide visual access or panoramic views to a large geographic area and are generally located at a point where surrounding views are greater than one mile away. Panoramic views are usually associated with vantage points over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, a large open space area, the ocean, or other water bodies. A substantial adverse effect to a scenic vista is one that degrades the view from such a designated view spot.

The Project Site lies within the Riverside Lowlands between the Santa Ana Mountains to the west and San Jacinto Foothills to the east. Scenic views of the Santa Ana Mountains and the San Jacinto Foothills may be seen from various vantage points through the French Valley area. The French Valley's open space consists of a mix of foothill natural areas, utility corridors, and parks. Open space is also found on the eastern side of the French Valley area by Lake Skinner. The Project Site is in an area of the French Valley that is characterized by flat topography and urban development.

The Riverside County General Plan does not designate any scenic vistas or corridors on or near the Project Site; however, Bachelor Mountain and the Santa Ana Mountains are visible to the east and west, respectively, to motorists and passerby traveling north/south along Washington Street. The Project Site is less than one-half mile west of the base of the Bachelor Mountain. Also, distant and partially obstructed views of the Peninsular Ranges, which are to the south of the Project Site are afforded to motorists and passerby traveling south along Washington Street.

Views of the Bachelor Mountain afforded to motorists and passerby traveling north and south along Washington Street would be partially obstructed by the Project's vertical improvements/features, including buildings and trees. However, due to the proposed building setback and tree placement, the obstructed view window would only occur along portions of Washington Street that abut the Project Site. Therefore, the view window afforded is fairly small and intermittent views would still be available. Additionally, due to the height and massing of the mountains, views of this scenic feature would continue to be provided to motorists and

passerby traveling along Washington Street. Additionally, the Riverside County General Plan does not designate any scenic vistas or protected viewsheds along Washington Street. Therefore, project development would not result in a substantial adverse effect on a scenic vista of these mountains.

Similarly, distant views of the Santa Ana Mountains and Peninsular Range to the west and south of Project Site, respectively, afforded to motorists and passerby traveling north and south along Washington Street would not be impacted as the Project would be developed on the east side of Washington Street and views of these scenic features is to the west and south. Therefore, project development would not result in a substantial adverse effect on a scenic vista of these mountain ranges.

Furthermore, the Project's development would not result in an adverse effect on a scenic vista of the area's open space resources noted above (foothill natural areas, utility corridors, and parks), as there are no such vistas afforded of these resources from the Project Site or its surroundings. Finally, according to the Riverside County General Plan Multipurpose Open Space Element, there are no designated open space resources or designations onsite or in the vicinity of the Project Site, a designation typically used to determine the value of certain public vistas in order to gauge adverse effects.

Based on the preceding, impacts would be less than significant and no mitigation measures are necessary.

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

No Impact. Scenic highways are a unique component of the region's circulation system as they traverse areas of scenic or aesthetic value. According to the California Department of Transportation (Caltrans), a highway may be designated as scenic depending on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view (Caltrans 2042a).

The Project Site is in a developing area of the County and is not on or near a state-designated or -eligible scenic highway, as designated on the California State Scenic Highway System Map of Caltrans (Caltrans 2042b). In fact, no highways within the French Valley area are eligible or officially designated state scenic highways. Additionally, the Project Site is not visible from the nearest state-eligible scenic highway (State Route 15), which is almost seven miles to the to the west toward the Santa Ana Mountains. There are also no rock outcroppings or historic buildings onsite—the Project Site is vacant and void of any buildings and structures or scenic features.

Furthermore, as shown on Figure 9, Scenic Highways, of the Southwest Area Plan, three highways within the Southwest Area Plan have been nominated for scenic highway status. The portions of Interstate 215 and State Route 79 South that pass through the plan area are Eligible Scenic Highways, as is Interstate 15. However, the Project Site is no on or anywhere near any of the Eligible Scenic Highways, not is the site visible from any of these highways.

Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. The assessment of aesthetic impacts is subjective by nature. Aesthetics generally refers to the identification of visual resources and their quality, as well as an overall visual perception of the environment. A project is generally considered to have a significant aesthetic impact if it substantially changes the character or quality of the Project Site such that the site becomes visually incompatible with or visually unexpected in its surroundings.

The Project Site is in an urbanized area of French Valley that is characterized by flat topography and urban development. Existing land use and conditions of the Project Site and surrounding area are depicted on Figure 3, *Aerial Photograph*. As shown on the figure, the Project Site is vacant land consisting mainly of mainly of ruderal vegetation. The Project Site is relatively flat with gentle slopes (approximately two percent grade) to the northwest. Surrounding land uses consist of vacant land and residential uses.

Following is a discussion of the potential impact to the visual character or quality of the Project Site and its surroundings resulting from the construction and operational phases of the Project.

Project Construction Phase

Project implementation would result in construction activities that would temporarily change the visual character of the Project Site and its surroundings. Construction activities would involve site clearing, grading, building, and site improvements. Construction staging areas, including earth stockpiling, storage of equipment and supplies, and related activities would contribute to a generally "disturbed site," which may be perceived by some as a visual impact.

However, these effects would be typical of any site in the County that undergoes development or redevelopment. Project development is anticipated to be completed in one building phase, which would include site preparation, grading, trenching, building construction and installation, paving, architectural coating, and finishing and landscaping. Overall construction is estimated to take approximately nine months, commencing in Fall 2025. Construction activities may be unsightly during the site preparation and construction phases; however, they would be temporary and would cease upon completion. Also, construction fencing would be erected to help shield the construction areas and would also be temporary. Specifically, the typical fencing to be provided (i.e., chain-link fencing with mesh fabric or similar screening material) would screen offsite views of the construction site, including the screening of stockpiles, graded areas, construction equipment, and building materials.

Therefore, Project-related construction activities would not have a significant effect on the existing visual character or quality of the site and its surroundings or conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant and no mitigation measures are necessary.

3. Environmental Analysis

Project Operation Phase

The project applicant is proposing to develop the Project Site with the Temecula Valley Charter School, which consists of a new charter school campus serving grades TK to eight. As shown on Figure 4, *Conceptual Site Plan*, the new school campus would feature a main building and 29 modular classroom buildings (two to be introduced under a future phase), as well as four modular restroom buildings, a trash enclosure, and modular storage units. Architecturally and functionally, the elongated rectangular-shaped main building would be designed and constructed as a single-story building. The modular buildings would be single-story in height and be placed east of the main building. Other project components include vehicular access and circulation improvements; surface parking areas and drive aisles; pedestrian access and circulation improvements; various landscape, hardscape, and lighting improvements; and infrastructure and utility improvements. Figure 4, *Conceptual Site Plan*, illustrates the overall site and landscape design of the Project. As illustrated on Figure 4, the main building would be placed in the western end of the Project Site with frontage onto Washington Street. The remainder of the site would feature the aforementioned project components.

Figures 5, *Main Building Elevations*, and 6, *Modular Building Elevations*, illustrate the conceptual elevations and architectural design and features of the proposed buildings. As shown in these figures, the buildings would incorporate a contemporary architectural style and aesthetic design, which express the buildings educational use and purpose. As illustrated on Figure 5, features and materials of the main school building include natural and painted concrete walls in four color schemes; high-performance tinted glazing (windows and doors); painted aluminum store front; and painted aluminum/steel awnings for shading. The massing of the building is broken up and varied to allow for a human-scale design. The building has also been designed to have multiple-feature elements on all façades. Building pop-outs, offsets, overhangs, recesses, and variations in building materials and colors would be added to offset the building's massing and provide relief to and variation in the building form and style. For example, the parapet heights would be varied for visual interest and breaking up the massing. Building entries would be articulated through the use of varied building materials and colors. The building's shapes and stylistic character mimic the rest of the Project design.

The design elements/features of the proposed buildings would be complimentary to and not detract from those of the existing residential surrounding the Project Site. While the Project establishes its own character, particularly with regard to architectural style and aesthetic design, its integration into the surrounding neighborhood is evidenced through the color palate and quality design. The school building's design establishes a visual connection and neighborhood identity while also relating to the school color and providing a bold architectural design. The design is also unique due to its identity as an educational use and expresses its uniqueness through its contemporary style.

Furthermore, Project implementation would provide compatible uses to the surrounding uses. As proposed, the charter school is permitted under the Riverside County Land Use Ordinance (Ordinance No. 348), with County approval and issuance of a public use permit and typical requirements that include adherence to height, lot-area, lot coverage, and other development standards. Schools are not only a permitted use on the Project Site, but they are considered a compatible use and fits well within the surrounding neighborhoods. Also, the proposed main building (including building massing and height), although taller than the buildings of the surrounding residential uses, would not detract from the visual character of the surrounding neighborhoods.

As shows on Figure 4, the placement of the building on the western end of the Project Site would ensure that a sufficient visual and physical buffer is provided between the new school building and the two-story homes to the north and that the building height and massing do not impede or detract from the visual quality and character of the homes.

Finally, the provisions of the Riverside County Land Use Ordinance and the County's development review process (i.e., the Project is subject to review and approval by the Riverside County Planning Commission) would help ensure that the Project is designed and implemented in a manner that would provide visual cohesiveness and compatibility not only within the Project Site, but along the Project Site frontages and with its surroundings. The Project would be designed and constructed in accordance with the applicable provisions of Riverside County Land Use Ordinance including those related but not limited to building height and setbacks, wall/fence heights, and landscaping requirements.

Overall, Project development would enhance and strengthen the visual character of the Project Site and its surroundings through new architecture, landscaping, hardscape, and other improvements onsite and along the Project Site's street frontages. The proposed architectural and landscape elements and design would ensure that development of the Project is not detrimental to the visual character or quality of the surrounding area or uses. The building masses, landscaping, and various hardscape and landscape improvements proposed throughout the Project Site would be designed to create a sense of cohesiveness on- and offsite and along the Project Site boundaries. Although newer than that of the surrounding area and uses, the proposed buildings, landscaping and site improvements would complement and not detract from the visual character of the site or surrounding area.

Based on the preceding, Project development would not substantially degrade the visual character or quality of the site and its surroundings or conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Lighting effects are associated with the use of artificial light during the evening hours. There are two primary sources of light: light emanating from building interiors passing through windows and openings, and light from exterior sources (i.e., street lighting, architectural building illumination, security lighting, parking lot lighting, landscape lighting, and signage). Excessive light and/or glare can impair vision, cause a nuisance, affect sleep patterns, and generate safety hazards when experienced by drivers. Uses such as residences, elderly care facilities, schools, and hotels are considered light sensitive, since occupants have expectations of privacy during evening hours and may be subject to disturbance by bright light sources. Light spill or trespass are considered a nuisance and are typically defined as the presence of unwanted light on properties adjacent to the property being illuminated. With respect to lighting, the degree of illumination may vary widely depending on the amount of light generated, height of the light source, presence of barriers or obstructions, type of light source, and weather conditions.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light on surfaces of buildings or objects, including highly polished surfaces such as glass windows or reflective materials and, to a

lesser degree, from broad expanses of light-colored surfaces. Perceived glare is the unwanted and potentially objectionable sensation experienced by a person as they look directly into the light source of a luminaire. Daytime glare generation is common in urban areas and is typically associated with buildings with exterior façades largely or entirely composed of highly reflective glass. Daytime glare can also be generated by light reflecting off passing or parked cars. Glare can also be produced during evening and nighttime hours by the reflection of artificial light sources such as automobile headlights. Glare generation is typically related to either moving vehicles or sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the day and year. Excessive glare not only impedes visibility, but also increases the ambient heat reflectivity in a given area. Glare-sensitive uses include residences, hotels, transportation corridors, and aircraft landing corridors.

As shown on Figure 3, *Aerial Photograph*, the vacant Project Site is in a developing area of the County and is surrounded by residential uses and vacant land. There are no sources of light or glare that exist on the Project Site; however, there are numerous sources of light and glare surrounding the Project Site.

Following is a discussion of the potential day- and nighttime light and glare impacts in the project area resulting from the construction and operational phases of the Project.

Project Construction Phase

Project construction would be limited to daytime hours, and nighttime lighting (with the exception of minimal lighting for security purposes) would not be required until the Project is operational. Therefore, no short-term construction-related impacts associated with light and glare would occur. Impacts would be less than significant and no mitigation measures are necessary.

Project Operation Phase

Daytime Glare

The Project includes building materials and architectural treatments that could cause daytime glare, but not to such an extent that they would result in a significant impact. For example, the architectural treatments of the proposed buildings would include building materials such as painted cement walls, glazing (glass windows and doors), and other decorative elements (see building elevations and renderings provided on Figures 5, *Main Building Elevations*, and 6, *Modular Building Elevations*). With the exception of the glass windows and doors, the building materials and architectural treatments are nonreflective and would therefore not create substantial day or nighttime glare. As illustrated on Figure 5, compared to the amount of nonreflective building materials, the use of glazing for the main building is limited (would make up less than five percent of the building façades).

Therefore, daytime glare impacts from Project-related architectural treatments and building materials would be less than significant and no mitigation measures are necessary.

Nighttime Lighting and Glare

Under existing conditions, the Project Site is vacant and void of any sources of artificial lighting. Project development would introduce new sources of artificial light to the Project Site and surrounding area. Nighttime site lighting would consist of exterior building-mounted light fixtures; interior lighting for the new buildings;

lighting for pedestrian walkways and common gathering areas; ground-mounted decorative lighting for landscape and architectural features; lighting for the new parking areas and drive aisles; and security lighting. These new sources artificial lighting have the potential to increase nighttime light and glare in the project area, as well as create offsite light spill or trespass that could result in a nuisance. Nighttime lighting and glare from the Project Site would be visible from the surrounding roadways and residential land uses.

Although Project development would introduce new light sources to the Project Site and surrounding area, the proposed light sources would be similar to the light sources of the residential neighborhood to the north and the existing school campus to the northwest (see Figure 3, *Aerial Photograph*). Existing nighttime lighting also emanates from streetlights along Washington Street and Yates Road. Considering the existing sources of lighting in the surrounding vicinity, the amount and intensity of nighttime lighting proposed onsite would not be detrimental to the residential uses to the north. It is unlikely that conventional lighting and illuminated operations under the Project would discernibly, much less adversely, affect ambient light conditions.

Additionally, as shown on Figure 4, *Conceptual Site Plan*, the proposed landscape plan calls for the planting of trees along the project perimeter. The proposed trees would help shield some of the lighting that would emanate from the Project Site. Also, no nighttime lighting is proposed for the turf soccer field.

Furthermore, Project development would be required to conform with all applicable lighting standards of the County Ordinance (Ordinance No. 348, or County Ordinance herein), including those of County Ordinance No. 915, Outdoor Lighting. Provisions are intended to prevent glare, light trespass, and light pollution. All proposed exterior lighting would be designed, arranged, installed, directed, shielded, operated, and maintained in such a manner as to contain direct illumination onsite and prevent light and glare impacts offsite in accordance with the provisions of County Ordinance No. 915, thereby, preventing excess illumination and light spillover onto adjoining residential land uses and/or roadways. Additionally, development of the proposed project would adhere to County Ordnance No. 655, which defines the project site within Zone B. Zone B prescribes standards of lamp types allowed such as low pressure sodium and 2040 lumens and below in Classes I, II, and III but prohibits lamp types above 4050 lumens in Class II and III. Through the Country's established site plan review processes, the County would ensure that final design of the Project complies with the requirements of the lightened standards of the County Ordinance and thus precludes or effectively minimizes potential light/glare overspill onto adjacent properties or roadways.

Compliance with the lighting provisions of the County Ordinance would ensure that the Project does not result in significant light impacts. Compliance with these provisions is ensured through the County's development review and building plan check process.

Based on the preceding, operational nighttime light and glare impacts related to the Project would be less than significant and no mitigation measures are necessary.

3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland.

3. Environmental Analysis

In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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

No Impact. According to the California Department of Conservation, the Project Site is not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Project Site is mapped as Other Land (the central and eastern portions) and Farmland of Local Importance (the western portion) (DOC 2022). "Other Land" includes land uses such as low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing. "Farmland of Local Importance" indicates land of importance to the local agricultural economy.

Based on the cultural resources assessment report prepared for the Project Site, the site is located in the French Valley where dry grain farming and stock grazing were locally dominant in the 1890s (Appendix B). Also, based on historical aerial photograph provided in the Phase I Environmental Site Assessment prepared for the Project Site, up until the 1950's the site and its surroundings appear undeveloped with intermittently tilled vegetation (Appendix F). However, the Project Site is in a developing area of the County and is not being utilized for agricultural operations or purposes. Based on the aerial photographs the Project Site has not been tilled for vegetation since the 1970s. The Project Site is not and will not be land that is used for agricultural purposes due to ongoing development in the project area and agricultural uses not being permitted under the Project Site's land use and zoning designations (discussed below). Also, there are no agricultural uses or operations abutting or in proximity of the Project Site. Additionally, County Ordinance No. 625, Right-to-Farm Ordinance, would continue to allow and/or protect neighboring properties to farm and utilize their land for agricultural uses safe from nuisance litigation against farmers. As previously described, the Project Site nor its abutting uses contain active farmland or other agricultural uses. Therefore, no impact would occur and no mitigation measures are necessary.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is not zoned for agricultural use—the site is zoned R-1 (One Family Dwelling Zone), which does not permit agricultural uses. The Project Site is also in a developing area of County that does not contain active farmland or other agricultural uses. Additionally, the Project Site is not subject to a Williamson Act contract[2] (DOC 2022). Therefore, Project implementation would not conflict with zoning for

[2] Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value.

agricultural uses or a Williamson Act contract. Accordingly, no impact would occur and no mitigation measures are necessary.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. Forest land is defined 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" (California Public Resources Code § 12220[g]). Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees" (California Public Resources Code § 4526).

As shown on Figure 3, *Aerial Photograph*, the Project Site is vacant land surrounded by residential uses and vacant land. Therefore, the Project Site does not meet the definition of lands designated as forestland or timberland as defined by PRC Sections 12220(g), 4526, and 51104(g). Additionally, the Project Site is not designated or zoned for forest or timber land or used for forestry. As stated above, the current Project Site is zoned R-1 (One Family Dwelling Zone). Therefore, no impact would occur and no mitigation measures are necessary.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. See response to Section 3.2.c, above. As substantiated in this section, no impact would occur and no mitigation measures are necessary.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. See responses to Section's 3.2.a, b, and c, above. As substantiated in these sections, no impact would occur and no mitigation measures are necessary.

3.3 AIR QUALITY

The Air Quality section addresses the impacts of the Project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthful pollutant concentrations. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the Project Site, and air quality modeling can be found in Appendix A.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (South Coast AQMD), is designated nonattainment for O_3, and $PM_{2.5}$

under the California and National AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2023).

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including volatile organic compound (VOC), CO, nitrogen oxides (NO_X), sulfur oxides (SO_X), PM_{10}, and $PM_{2.5}$. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Where available, the significance criteria established by the South Coast AQMD may be relied upon to make the following determinations.

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the air quality management plan (AQMP). It fulfills the CEQA goal of informing decision makers of the environmental efforts of the project under consideration at an early enough stage to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to clean air goals in the AQMP.

The South Coast AQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022 (South Coast AQMD 2022). Regional growth projections are used by South Coast AQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. In addition, the consistency analysis is generally only required in connection with the adoption of general plans, specific plans, and significant projects. Changes in population, housing, or employment growth projections have the potential to affect SCAG's demographic projections and therefore the assumptions in South Coast AQMD's AQMP. These demographic trends are incorporated into SCAG's 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to determine priority transportation projects and vehicle miles traveled in the SCAG region.

The Project consists of relocation, construction, and operation a new TK-8 charter school campus to serve up to 900 students. Based on the scope and nature of the Project and that the student population would be transferred from other schools within the region, the Project would not substantially affect housing, employment, or population projections within the region. Additionally, as demonstrated below in Section 3.3.b, the regional emissions that would be generated by the operational phase of the Project would be less than the South Coast AQMD emissions thresholds and would therefore not be considered by South Coast AQMD to be a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. Therefore, the Project would not affect the regional emissions inventory or conflict with strategies in the 2022 AQMP. Impacts would be less than significant and no mitigation measures are necessary.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. The following describes Project-related impacts from regional short-term construction activities and regional long-term operation of the Project.

Regional Short-Term Construction Impacts

Construction activities would result in the generation of air pollutants. These emissions would primarily be 1) exhaust from off-road diesel-powered construction equipment; 2) dust generated by construction activities; 3) exhaust from on-road vehicles; and 4) off-gassing of volatile organic compounds (VOCs) from paints and asphalt.

Construction activities for the Project is anticipated to disturb the entire 11.99-acre Project Site. The Project would involve site preparation, rough and fine grading, utilities trenching, building construction, modular building installation, paving, architectural coating, and finishing and landscaping for both on- and offsite construction activities. Overall construction is estimated to take approximately nine months, commencing in Fall 2025. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1, based on the preliminary construction duration and equipment mix provided by the project applicant. Construction emissions modeling is provided in Table 1.

Table 1 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lbs/day)[1, 2,3]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 2023						
Onsite Site Preparation	4	40	37	<1	10	6
Onsite Rough Grading	6	58	49	<1	10	6
Onsite Fine Grading	1	6	11	<1	1	<1
Onsite Utility Trenching, Onsite Building Construction, Onsite Paving	2	18	25	<1	2	1
Onsite Utility Trenching, Onsite Building Construction, Onsite Paving, Onsite Modular Building Installation	3	22	31	<1	2	1
Onsite Utility Trenching, Onsite Building Construction, Onsite Modular Building Installation, Onsite Architectural Coating	9	23	33	<1	2	1
Onsite Utility Trenching, Onsite Building Construction, Onsite Architectural Coating	8	19	26	<1	1	1
Onsite Building Construction, Onsite Architectural Coating	7	12	18	<1	1	1
Onsite Building Construction 2023	1	8	12	<1	1	<1
Year 2024						
Onsite Building Construction 2024	1	7	12	<1	1	<1
Onsite Building Construction 2024 and Onsite Finishing/Landscaping	1	12	20	<1	1	1
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Site Preparation	2	16	26	<1	1	1

3. Environmental Analysis

Table 1 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lbs/day)[1, 2,3]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Asphalt Demolition[3]	1	15	21	<1	3	1
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Rough Grading	3	29	35	<1	4	2
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Fine Grading	1	12	22	<1	1	1
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Paving	2	15	24	<1	1	1
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Paving, Offsite Finishing/Landscaping	2	15	24	<1	1	1
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Finishing/Landscaping	1	12	20	<1	1	1
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Finishing/Landscaping, Offsite Architectural Coating	4	12	20	<1	1	1
Onsite Building Construction 2024, Onsite Finishing/Landscaping	1	12	20	<1	1	1
Maximum Daily Construction Emissions						
Maximum Daily Emissions	9	58	49	<1	10	6
South Coast AQMD Regional Construction Threshold	75	100	550	150	150	55
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1., South Coast AQMD 2023.
Notes: lbs = Pounds.
[1] Based on the preliminary information provided by the project applicant. Where specific information regarding Project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.
[2] Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.
[3] Emissions based on preliminary construction duration of July 2023 through June 2024 received from the project applicant. As the model assumes construction equipment would become more efficient over time as older equipment is phased out, maximum daily emissions estimates are conservative. Emission rates calculated for crushing/processing equipment in Offsite Asphalt Demolition phase based on OFFROAD2021 Version 1.0.3. construction and mining vehicle category (Appendix A).

As noted above, Project construction is anticipated to commence in Fall 2025. However, it should be noted that the emissions shown in Table 1 are based on a preliminary construction duration of July 2023 through June 2024 provided by the project applicant earlier in the project development stage. As the model assumes construction equipment would become more efficient over time as older equipment is phased out, maximum daily emissions estimates shown in the table are conservative and additional modeling is not required.

As demonstrated in the table, the maximum daily emissions for VOC, NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$ from on- and offsite construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. Therefore, air quality impacts from Project-related construction activities would be less than significant and no mitigation measures are necessary.

Long-Term Operation-Related Air Quality Impact

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). The Project would result in the development of a TK-8 charter school campus on the Project Site. The proposed buildings would, at minimum, be designed and built to meet the latest Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen). As shown in Table 2, it is anticipated that operation of the Project would result in an overall minimal net increase in emissions and would not exceed the South Coast AQMD regional operation-phase significance thresholds. Therefore, impacts on the regional air quality associated with Project operation would be less than significant and no mitigation measures are necessary.

Table 2 Net Change in Maximum Daily Regional Operation Emissions

Source	Maximum Daily Emissions (lbs/Day)[1]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Max Daily Emissions						
Mobile	3	2	43	<1	9	2
Area	2	<1	2	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Total	5	3	45	<1	9	2
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1, South Coast AQMD 2023.
Notes: lbs = Pounds. Highest winter or summer emissions are reported.
1. Modeling based on the proposed net increase in student capacity by 354 students compared to the existing charter school to be relocated to the Project Site.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The Project could expose sensitive receptors to elevated pollutant concentrations if it causes or significantly contributes to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

Construction LSTs

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The screening-level construction LSTs are based on the size of the Project Site, distance to the nearest sensitive receptor, and Source Receptor Area (SRA). The nearest offsite sensitive receptors are the residences along Yates Road approximately 70 feet to the north of the Project Site.

3. Environmental Analysis

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 3 demonstrates that the maximum daily construction emissions (pounds per day) for NO_X, CO, PM_{10}, and $PM_{2.5}$ construction emissions would be less than their respective South Coast AQMD screening-level LSTs. Therefore, air quality impacts from Project-related construction activities would be less than significant and no mitigation measures are necessary.

As noted above, Project construction is anticipated to commence in Fall 2025. However, it should be noted that the emissions shown in Table 3 are based on a preliminary construction duration of July 2023 through June 2024 provided by the project applicant earlier in the project development stage. As the model assumes construction equipment would become more efficient over time as older equipment is phased out, maximum daily emissions estimates shown in the table are conservative and additional modeling is not required.

Table 3 Localized Construction Emissions

Construction Activity	Pollutants(lbs/day)[1,3]			
	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
South Coast AQMD ≤1.00 Acre LST	118	602	4.00	3.00
Onsite Utility Trenching, Onsite Building Construction, Onsite Paving	17	21	0.84	0.77
Onsite Utility Trenching, Onsite Building Construction, Onsite Paving, Onsite Modular Building Installation	21	26	1.04	0.96
Onsite Utility Trenching, Onsite Building Construction, Onsite Modular Building Installation, Onsite Architectural Coating	22	27	1.01	0.94
Onsite Utility Trenching, Onsite Building Construction, Onsite Architectural Coating	18	23	0.81	0.75
Onsite Building Construction, Onsite Architectural Coating	11	15	0.42	0.39
Onsite Building Construction 2023	7	10	0.28	0.26
Onsite Building Construction 2024	7	10	0.25	0.23
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Finishing/Landscaping, Offsite Architectural Coating	11	17	0.44	0.40
Exceeds LST?	No	No	No	No
South Coast AQMD 1.50-Acre LST	144	742	5.50	3.50
Onsite Building Construction 2024 and Onsite Finishing/Landscaping	11	17	0.44	0.40
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Asphalt Demolition[3]	11	17	1.51	0.57
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Fine Grading	12	19	0.47	0.43
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Paving	14	21	0.59	0.54
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Paving, Offsite Finishing/Landscaping	14	21	0.59	0.54

Table 3 Localized Construction Emissions

Construction Activity	Pollutants(lbs/day)[1,3]			
	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Finishing/Landscaping	11	17	0.44	0.40
Exceeds LST?	No	No	No	No
South Coast AQMD 2.00 Acre LST	170	883	7.00	4.00
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Site Preparation	16	23	0.89	0.64
Exceeds LST?	No	No	No	No
South Coast AQMD 2.25 Acre LST	178	941	7.50	4.33
Onsite Fine Grading	6	10	0.30	0.27
Exceeds LST?	No	No	No	No
South Coast AQMD 2.63 Acre LST	191	1,027	8.25	4.83
Onsite Building Construction 2024, Onsite Finishing/Landscaping, Offsite Rough Grading	29	32	3.61	2.16
Exceeds LST?	No	No	No	No
South Coast AQMD 3.38 Acre LST	216	1,201	9.75	5.83
Onsite Rough Grading	58	47	9.75	5.50
Exceeds LST?	No	No	No	No
South Coast AQMD 3.50 Acre LST	220	1,230	9.99	6.00
Onsite Site Preparation	40	36	9.48	5.60
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2022.1. South Coast AQMD 2008 and 2011.
Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment are included in the analysis. Screening level LSTs are based on an 82 ft receptor in SRA 24.
1. Where specific information for Project-related construction activities or processes was not available modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD.
2. Includes fugitive dust control measures required by South Coast AQMD under Rule 403, such as watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.
3. Emissions based on preliminary construction duration of July 2023 through June 2024 received from the project applicant. As the model assumes construction equipment would become more efficient over time as older equipment is phased out, localized onsite construction emissions estimates are conservative. Emission rates calculated for crushing/processing equipment in Offsite Asphalt Demolition phase based on OFFROAD2021 Version 1.0.3. construction and mining vehicle category (Appendix A)

Construction Health Risk

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In 2015, the Office of Environmental Health Hazards Assessment (OEHHA) adopted guidance for preparation of health risk assessments, which included the development of a cancer risk factor and non-cancer chronic reference exposure level for DPM over a 30-year time frame (OEHHA 2015). Currently, South Coast AQMD does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. The Project is anticipated to be completed in approximately nine months, which would limit the exposure to on- and offsite receptors. Furthermore, construction activities would not generate onsite exhaust emissions that would exceed the screening-level construction LSTs, as demonstrated in Table 3, *Localized Construction Emissions*.

Therefore, construction emissions would not pose a health risk to onsite and offsite receptors, and Project-related construction health impacts would be less than significant. No mitigation measures are necessary.

Operation LSTs

Project operation would not generate substantial emissions from onsite stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where truck idling would occur onsite and would require a permit from South Coast AQMD. The Project does not fall within these categories of uses. While operation of the new buildings would use standard onsite mechanical equipment such as heating, ventilation, and air conditioning, air pollutant emissions would be nominal. Therefore, localized air quality impacts related to operation-related emissions would be less than significant and no mitigation measures are necessary.

Carbon Monoxide Hotspots

Vehicle congestion has the potential to create pockets of CO called hotspots. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles are backed-up and idle for longer periods and are subject to reduced speeds. These pockets could exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations.

The SoCAB has been designated attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (BAAQMD 2017). Based on the traffic impact analysis prepared for the Project (Appendix L), the Project-related peak hour trips would be 936 AM peak hour vehicle trips and overall total peak hours trips for the intersections within the traffic study area under the with Project conditions would be minimal compared to the AAQS screening levels. Therefore, the Project would not substantially increase CO hotspots at intersections. Impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. The Project would not result in objectionable odors. The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The Project involves construction of a TK-8 charter school campus and would not fall within the objectionable odors land uses. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be low in concentration, temporary, and would not affect a substantial number of people. Therefore, odor impacts would be less than significant and no mitigation measures are necessary.

3.4 BIOLOGICAL RESOURCES

The analysis in this section is based in part on the following technical study, included as Appendix B to this Initial Study:

- *General Biological Assessment and Western Riverside County MSHCP Consistency*, Hernandez Environmental Services, September 2023

Would the project:

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

Less Than Significant Impact. Candidate species are plants and animals that have been studied and the US Fish and Wildlife Service (USFWS) has concluded that they should be proposed for addition to the federal endangered and threatened species list.

Sensitive biological resources are habitats[3] or individual species that have special recognition by federal, state, or local conservation agencies and organizations as endangered, threatened, or rare. The California Department of Fish and Wildlife (CDFW), USFWS, and organizations like the California Native Plant Society maintain watch lists of such resources.

Special status species is a universal term used in the scientific community for species that are considered sufficiently rare that they require special consideration and/or protection and should be, or have been, listed as rare, threatened, or endangered by USFWS and/or CDFW.

[3] Per the California Department of Fish and Wildlife, habitat is where a given plant or animal species meets its requirements for food, cover, and water in both space and time.

3. Environmental Analysis

Following is a summary of the findings and conclusions of the biological resources assessment prepared for the Project Site (Appendix B).

Sensitive Biological Resources

According to the California Natural Diversity Database, a total of 68 sensitive species of plants and 57 sensitive species of animals has the potential to occur on or within the vicinity of the Project Site. These include those species listed or candidates for listing by USFWS, CDFW, and California Native Plant Society (CNPS). All habitats with the potential to be used by sensitive species were evaluated during the field survey conducted as a part of the biological resources assessment prepared for the Project Site (Appendix B). The assessment addressed those species listed as candidate, rare, threatened, or endangered under the state and federal endangered species laws or directed to be evaluated under the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP). Sensitive species that have a potential to occur on or within the vicinity of the Project Site were also considered in the biological resources assessment.

Sensitive Plant Resources

A total of 23 plant species are listed as state and/or federal threatened, endangered, or candidate species; are 1B.1 listed plants on the CNPS Rare Plan Inventory; or have been found to have a potential to exist on the Project Site. Following are descriptions of these species and whether or not they are present on the Project Site. As demonstrated below, impacts to sensitive plant resources would be less than significant and no mitigation measures are necessary.

Chaparral sand-verbena

Chaparral sand-verbena (Abronia villosa var. aurita) is ranked 1B.1 in the CNPS Rare Plant Inventory. It is found in sandy areas of chaparral, coastal scrub, and desert dunes habitats. No habitat for this species is present on the Project Site. This species is not present.

Munz's onion

Munz's onion (Allium munzii) is a federally Endangered, state Threatened, and CNPS 1B.1 listed plant species. It is found in chaparral, coastal scrub, valley and foothill grasslands, cismontane woodland, and pinyon and juniper woodland. The Project Site does not have suitable habitat for this species. This species is not present.

San Diego ambrosia

San Diego ambrosia (Ambrosia pumila) is listed as federally Endangered and ranked 1B.1 in the CNPS Rare Plant Inventory. Its habitat includes wetlands in chaparral, coastal sage scrub, valley, and foothill grassland. It is commonly found in sandy loam or clay soil and sometimes in alkaline soils. This species persists where disturbance has been superficial. It is also sometimes found on margins or near vernal pools. No habitat for this species is present on the Project Site. This species is not present.

Rainbow Manzanita

Rainbow Manzanita (Arctostaphylos rainbowensis) is ranked 1B.1 in the CNPS Rare Plant inventory. It is usually found in gabbro chaparral habitat. No habitat for this species is present on the Project Site. This species is not present.

Jaeger's milk-vetch

Jaeger's milk-vetch (Astragalus pachypus var. jaegeri) is ranked 1B.1 in the CNPS Rare Plant Inventory. It is often found in dry ridges and valleys and open sandy slopes. Its habitat includes coastal scrub, chaparral, valley and foothill grassland, and cismontane woodland. No habitat for this species is present on the Project Site. This species is not present.

San Jacinto Valley crownscale

San Jacinto Valley crownscale (Atriplex coronata var. notatior) is a federally listed Endangered Species and is ranked 1B.1 in the CNPS Rare Plant Inventory. Its habitat includes playas, valley and foothill grassland, and vernal pools. It is commonly found in the alkaline areas in the San Jacinto River Valley. No habitat for this species is present on the Project Site. This species is not present.

Parish's brittlescale

Parish's brittlescale (Atriplex parishii) is ranked 1B.1 in the CNPS Rare Plant Inventory. Its habitat includes shadescale scrub, alkali sink, riparian, playas, vernal pools, and wetland. It is usually found on drying alkali flats with fine soils. No habitat for this species is present on the Project Site. This species is not present.

Nevin's barberry

Nevin's barberry (Berberis nevinii) is a federally and state listed Endangered species and is ranked 1B.1 in the CNPS Rare Plant Inventory. It is typically found on steep, north facing slopes or in low grade sandy washes. Its habitat includes chaparral, cismontane woodland, coastal scrub, and riparian scrub. No habitat for this species is present on the Project Site. This species is not present.

Thread-leaved brodiaea

The thread-leaved brodiaea (Brodiaea filifolia) is a federally Threatened and state Endangered Species and is ranked 1B.1 in the CNPS Rare Plant Inventory. It is found in chaparral, cismontane woodlands, coastal sage scrub, valley and foothill grasslands, vernal pools, and wetland. No habitat for this species is present on the Project Site. This species is not present.

Orcutt's brodiaea

Orcutt's brodiaea (Brodiaea orcuttii) is ranked 1B.1 in the CNPS Rare Plant Inventory. The species occurs in mesic, clay habitats, usually in vernal pools and small drainages. Its habitats include vernal pools, valley and foothill grassland, closed-cone coniferous forest, cismontane woodland, chaparral, meadows, and seeps. No habitat for this species is present on the Project Site. This species is not present.

Vail Lake ceanothus

Vail Lake ceanothus (Ceanothus ophiochilus) is a federally Threatened, state Endangered species and is ranked 1B.1 in the CNPS Rare Plant Inventory. The species typically occurs in gabbro seams on north-facing ridges on the eastern sides of mountains in chaparral habitat. No habitat for this species is present on the Project Site. This species is not present.

3. Environmental Analysis

Smooth tarplant

Smooth tarplant (Centromadia pungens ssp. laevis) is ranked 1B.1 in the CNPS Rare Plant Inventory. The species occurs in habitats that include alkali playa, chenopod scrub, meadows and seeps, riparian woodlands, wetlands, and valley and foothill grasslands. No habitat for this species is present on the Project Site. This species is not present.

Orcutt's pincushion

Orcutt's pincushion (Chaenactis glabriuscula var. orcuttiana) is ranked 1B.1 in the CNPS Rare Plant Inventory. The species occurs in sandy sites of coastal bluff scrub, and coastal dunes habitat. No habitat for this species is present on the Project Site. This species is not present.

Parry's spineflower

Parry's spineflower (Chorizanthe parryi var. parryi) is ranked 1B.1 in the CNPS Rare Plant Inventory. The species occurs in dry, sandy soils on dry slopes and flats, sometimes at the interface of two vegetations types, such as chaparral and oak woodland. Its habitat includes coastal scrub, chaparral, cismontane woodland, valley, and foothill grassland. No habitat for this species is present on the Project Site. This species is not present.

Mojave tarplant

Mojave tarplant (Deinandra mohavensis) is a state listed Endangered Species and is ranked 1B.3 in the CNPS Rare Plant Inventory. This species is typically found in low sand bars in river beds and most commonly in riparian or ephemeral grassy areas. Its habitat includes chaparral, coastal scrub, and riparian scrub. No habitat for this species is present on the Project Site. This species is not present.

Slender-horned spineflower

Slender-horned spineflower (Dodecahema leptoceras) is a federally and state listed Endangered Species and is ranked 1B.1 in the CNPS Rare Plant Inventory. Its habitats include chaparral, cismontane woodland, and alluvial fan sage scrub. It is typically found on sandy soils in flood deposited terraces and washes. No habitat for this species is present on the Project Site. This species is not present.

San Diego button-celery

San Diego button-celery (Eryngium aristulatum var. parishii) is a federally and state listed Endangered Species and is ranked 1B.1 in the CNPS Rare Plant Inventory. Its habitats include Vernal pools, coastal scrub, valley, and foothill grassland. It is typically found on San Diego mesa hardpan and claypan vernal pools and southern interior basalt flow vernal pools; usually surrounded by scrub. No habitat for this species is present on the Project Site. This species is not present.

Mesa horkelia

Mesa horkelia (Horkelia cuneata var. puberula) is ranked 1B.1 in the CNPS Rare Plant Inventory. This species habitats includes chaparral, cismontane woodland, and coastal sage scrub. It is found on sandy or gravelly sites. No habitat for this species is present on the Project Site. This species is not present.

Coulter's goldfields

Coulter's goldfields (Lasthenia glabrata ssp.coulteri) is ranked 1B.1 in the CNPS Rare Plant Inventory. This species is usually found on alkaline soils in playas, sinks, and grasslands and flowers during April through May. Its habitat includes alkali playas, marsh, swamp, salt marsh, vernal pool, and wetland. No habitat for this species is present on the Project Site. This species is not present.

Spreading navarretia

Spreading navarretia (Navarretia fossalis) is a federally listed Threatened Species and is ranked 1B.1 in the CNPS Rare Plant Inventory. Its habitat includes alkali playa, chenopod scrub, marsh and swamp, vernal pools, and wetlands. This species is typically found in swales and vernal pools, often surrounded by other habitat types. No habitat for this species is present on the Project Site. This species is not present.

California Orcutt grass

California Orcutt grass (Orcuttia californica) is a federally and state listed Endangered Species and is ranked 1B.1 in the CNPS Rare Plant Inventory. It is found in vernal pools. No habitat for this species is present on the Project Site. This species is not present.

Gander's ragwort

Gander's ragwort (Packera ganderi) is a state listed Rare Species and is ranked 1B.2 in the CNPS Rare Plant Inventory. Its habitat includes chaparral. It is found in recently burned sites and gabbro outcrops. No habitat for this species is present on the Project Site. This species is not present.

Bottle liverwort

Bottle liverwort (Sphaerocarpos drewei) is ranked 1B.1 in the CNPS Rare Plant Inventory. Its habitats include chaparral and coastal scrub. No habitat for the species is present on the Project Site. This species is not present.

Sensitive Animal Resources

A total of 14 animal species are listed as state and/or federal threatened, endangered, or candidate. Following are descriptions of these species and whether or not they are present on the Project Site. As demonstrated below, impacts to sensitive animal resources would be less than significant and no mitigation measures are necessary.

Tricolored blackbird

Tricolored blackbird (Agelaius tricolor) is a state listed Threatened Species and listed by the CDFW as a Species of Special Concern. The species occupies freshwater marshes with canopies of willows and other riparian trees. This species requires open accessible water and suitable foraging space. There is no habitat for this species on the Project Site. This species is not present.

Arroyo toad

Arroyo toad (Anaxyrus californicus) is a federally listed Endangered Species. This species habitats include desert wash, riparian scrub, riparian woodland, south coast flowing waters, and south coast standing water. It is found

in rivers with sandy banks, willows, cottonwoods, and sycamores or gravelly areas of streams in drier parts of range. No suitable habitat occurs on site. This species is not present.

Burrowing owl

Burrowing owl (Athene cunicularia) is a CDFW Species of Special Concern. This species is found in coastal prairie, coastal scrub, great basin grassland, great basin scrub, Mojave Desert scrub, Sonoran Desert scrub, and valley and foothill grassland. This species is typically found in open and dry annual or perennial grasslands, deserts, and scrublands characterized by lowgrowing vegetation. It is a subterranean nester and is dependent upon burrowing mammals, most notably the California ground squirrel.

A habitat assessment was conducted for the Project Site as a part of the biological resources assessment. The assessment determined that suitable habitat is present due to the presence of small mammal burrows. However, no burrowing owl or burrowing owl sign were found on or in the vicinity of the site during the focused surveys conducted in June through July of 2023 (Appendix B). Based on the focused survey, it was determined that no burrowing owl currently occupy the site. This species is not present.

Crotch bumble bee

Crotch bumble bee (Bombus crotchii) is a state Candidate Endangered Species. It's located in coastal California east to the Sierra-Cascade crest and south into Mexico. Its food plan genera include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum. There is no habitat for this species on the Project Site. This species is not present.

Vernal pool fairy shrimp

Vernal pool fairy shrimp (Branchinecta lynchi) is a federally listed Threatened Species. This species is found in seasonal pools of water in valley and foothill grasslands. This species typically inhabits small, clear-water sandstone-depression pools and grassed swale, earth slump, or basalt-flow depression pools. The Project Site does not contain suitable habitat for this species. This species is not present.

San Diego fairy shrimp

San Diego fairy shrimp (Branchinecta sandiegonensis) is a federally listed Endangered species. This species is found in chaparral, coastal scrub, vernal pool, and wetland habitats. It is endemic to San Diego and Orange County mesas. There is no habitat for this species on the Project Site. This species is not present.

Swainson's hawk

Swainson's hawk (Buteo swainsoni) is a state listed Threatened species. This species favors open grasslands for foraging but also occurs in agricultural settings. It relies on scattered stands of trees near agricultural fields and grasslands for nesting sites. Its habitats include great basin grassland, riparian forest, riparian woodland, and valley and foothill grassland. The Project Site does not contain suitable habitat for this species. This species is not present.

Western yellow-billed cuckoo

Western yellow-billed cuckoo (Coccyzus americanus occidentalis) is a federally listed Threatened and state listed Endangered species. This species typically nests in riparian jungles of willows, often mixed with cottonwoods, with a lower story of blackberry, nettles, or wild grape. It is found in riparian forest habitat. The Project Site does not contain suitable habitat for this species. This species is not present.

San Bernardino kangaroo rat

San Bernardino kangaroo rat (Dipodomys merriami parvus) is a federally listed Endangered Species, state listed Candidate Endangered Species, and a CDFW Species of Special Concern. It is found in coastal scrub habitat. This species is found in alluvial scrub vegetation on sandy loam substrates, characteristic of alluvial fans and flood plains. It needs early to intermediate seral stages. The Project Site does not contain suitable habitat for this species. This species is not present.

Stephen's kangaroo rat

Stephens' kangaroo rat (Dipodomys stephensi) is a federally and state listed Threatened Species. This species is found in coastal sage scrub with sparse vegetation cover, and in valley and foothill grasslands. This species prefers buckwheat, chamise, brome grass, and filaree and will burrow into firm soil. The Project Site does not have suitable habitat for this species. This species is not present.

Quino checkerspot butterfly

Quino checkerspot butterfly (Euphydryas editha quino) is a federally listed Endangered Species. It is found in chaparral and coastal sage scrub. This species requires high densities of food plants, including Plantago erecta, P. insularis, and Orthocarpus purpurescens. The Project Site does not have suitable habitat for this species. This species is not present.

Bald Eagle

Bald eagle (Haliaeetus leucocephalus) is a state listed Endangered and CDFW fully protected species. This species is found in lower montane coniferous forest and old-growth. They nest in large old-growth or tress with open branches, especially ponderosa pine. The Project Site does not contain suitable habitat for this species. This species is not present.

Coastal California gnatcatcher

Coastal California gnatcatcher (Polioptila californica californica) is a federally listed Threatened Species and CDFW Species of Special Concern. This species is found in coastal bluff scrub and coastal scrub habitat. This species is typically found in low, coastal sage scrub in arid washes, on mesas and slopes. The Project Site does not have suitable habitat for this species. This species is not present.

Riverside fairy shrimp

Riverside fairy shrimp (Streptocephalus woottoni) is a federally listed Endangered Species. This species is found in coastal scrub, valley and foothill grassland, vernal pool, and wetland habitat. This species typically inhabits seasonally astatic pools filled by winter/spring rains. The Project Site does not contain suitable habitat for this species. This species is not present.

Least Bell's vireo

Least Bell's vireo (Vireo bellii pusillus) is a federal and state listed Endangered Species. This species is found in riparian forest, riparian scrub, and riparian woodland. Nesting habitat of this species is restricted to willow and/or mulefat dominated riparian scrub along permanent or nearly permanent streams. The Project Site does not contain suitable habitat for this species. This species is not present.

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

No Impact. Sensitive natural communities are communities that are considered rare in the region by regulatory agencies; known to provide habitat for sensitive animal or plant species; or known to be important wildlife corridors. Riparian habitats are those occurring along the banks of rivers and streams. No riparian, sensitive or undisturbed native/natural habitats were documented within or adjacent to the Project Site as substantiated in biological resources assessment prepared for the Project Site (Appendix B). The Project Site is characterized as heavily disturbed non-native grassland, no natural habitats occur onsite, and the site in a developing area of the County. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as streams, swamps, marshes, and bogs.

As stated in the biological resources assessment report prepared for the Project Site, no streams, drainages, or riparian habitat occur on-site. Also, no CDFW, United States Army Corps of Engineers (USACE), or Regional Water Quality Control Board jurisdictional waters occur on-site. Further, no wetlands or vernal pools were found on-site during the intensive field survey conducted by biological staff of Hernandez Environmental Services (Appendix B). Therefore, no impact would occur and no mitigation measures are necessary.

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?

Less Than Significant Impact With Mitigation Incorporated. Wildlife movement corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbances. As a part of the biological resources assessment prepared for the Project Site, the site was evaluated for its function as a wildlife corridor that species use to move between wildlife habitat zones. Usually, mountain canyons or riparian corridors are used by wildlife as corridors. As shown in Figure 3, the Project Site consists of flat ruderal or disturbed land surrounded by residential development, the San Diego Aqueduct,

commercial development, and busy roads. As concluded in the biological resources assessment report, no wildlife movement corridors were found to be present on the Project Site (Appendix B).

However, a number of trees in the northeastern end of the Project Site (see Figure 3) would be removed because of Project implementation. The project site also contains shrubs that can support nesting songbirds during the nesting bird season. The trees may provide suitable habitat, including nesting habitat, for migratory birds under the federal Migratory Bird Treaty Act (MBTA) and Section 3513 et seq., of the California Fish and Game Code. Section 3513 provides protection to the birds listed under the MBTA—essentially all native birds. Additionally, Section 3503 of the Fish and Game Code makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird.

Project construction could result in direct and/or indirect impacts to nesting birds, including the loss of nests, eggs, and fledglings if ground-disturbing activities occur during the nesting season (generally February 1 through September 15). Construction activities during this time may result in reduced reproductive success and may violate the MBTA and California Fish and Game Code Sections 3503 and 3513. If construction (including any ground-disturbing activities) occurs during the nesting season, a nesting bird survey must be conducted by a qualified biologist prior to grading activities, as outlined in Mitigation Measure BIO-1. If nesting birds are observed within or adjacent to the construction activities, avoidance of active bird nests should occur as determined by the qualified biologist to ensure compliance with these regulations. Also, Mitigation Measure BIO-2 requires that removal of vegetation or any other potential nesting bird habitat disturbances be conducted outside of the avian nesting season.

Adherence to the MBTA regulations and implementation of Mitigation Measures BIO-1 and BIO-2 would ensure that if construction activities occur during the breeding season, appropriate measures would be taken to avoid impacts to nesting birds, if any are encountered. Compliance with the MBTA requirements and Mitigation Measure BIO-1 would be ensured through the County' development review process. Therefore, impacts would be reduced to a level of less than significant with implementation of mitigation.

Mitigation Measures

BIO-1 To avoid impacts to nesting birds within or adjacent to the Project Site and to comply with the California Fish and Game Code Sections 3503 and 3513 and the Migratory Bird Treaty Act, any site clearing and ground-disturbing activities should occur during the non-nesting (or nonbreeding) season for birds (generally, September 1st to January 31st). If this avoidance schedule is not feasible, prior to the commencement of any proposed actions (e.g., site clearing, grading) during the breeding/nesting season, a qualified monitoring biologist contracted by the project applicant shall conduct a preconstruction survey(s) to identify any active nests in and adjacent to the Project Site no more than 14 days prior to initiation of the action. If the biologist does not find any active nests that would be potentially impacted, the proposed action may proceed. However, if the biologist finds an active nest within or directly adjacent to the action area (within 100 feet) and determines that the nest may be impacted, the biologist shall delineate an appropriate buffer zone (generally 300 feet for songbirds and 500 feet for raptors) around the nest using temporary plastic fencing or other suitable materials, such as barricade tape and traffic cones. The final buffer zone shall be determined by the

biologist in consultation with applicable resource agencies; in consideration of species sensitivity and existing nest site conditions; and in coordination with the construction contractor. The qualified biologist shall serve as a construction monitor when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests. Only specified activities (if any) approved by the qualified biologist in coordination with the construction contractor shall take place within the buffer zone until the nest is vacated. Activities that may be prohibited within the buffer zone by the biologist include but are not limited to grading and tree clearing. Once the nest is no longer active and upon final determination by the biologist, the proposed action may proceed within the buffer zone. The monitoring biologist shall prepare a survey report summarizing his/her findings and recommendations of the preconstruction survey. Any active nests observed during the survey shall be mapped on a current aerial photograph, including documentation of GPS coordinates, and included in the survey report. The completed survey report shall be submitted to the Riverside County Planning Department prior to the commencement of construction-related activities that have the potential to disturb any active nests during the nesting season.

BIO-2 Birds and their nests are protected by the Migratory Bird Treaty Act (MBTA) and California Department of Fish and Wildlife (CDFW) Codes. Since the project site supports suitable nesting bird habitat, removal of vegetation or any other potential nesting bird habitat disturbances shall be conducted outside of the avian nesting season (February 1st through August 31st). If habitat must be cleared during the nesting season, a preconstruction nesting bird survey shall be conducted. The preconstruction nesting bird survey must be conducted by a biologist who holds a current memorandum of understanding with the County of Riverside. If nesting activity is observed, appropriate avoidance measures shall be adopted to avoid any potential impacts to nesting birds. The nesting bird survey must be completed no more than 3 days prior to any ground disturbance. If ground disturbance does not begin within 3 days of the survey date a second survey must be conducted. If nesting birds are discovered within the project site, the project's biologist shall mark a buffer around the nest. At a minimum, construction activities shall stay outside of a 300-foot buffer around the active nests. For raptor species, the buffer shall be expanded to 500 feet. The approved buffer zone shall be marked in the field with construction fencing, with no vegetation clearing or ground disturbance shall commence until the qualified biologist and Riverside County Environmental Programs Division (EPD) of the Planning Department verify that the nests are no longer occupied, and the juvenile birds can survive independently from the nests. Once the young have fledged and the left the nest, or the nest otherwise becomes inactive under natural conditions, normal construction activities may occur. The project's biologist shall monitor the nest during construction activity to ensure no disturbance to the birds are occurring and shall have the authority to halt ground disturbing activities if they are impacting the nesting birds. Prior to issuance of a permit for grading, including permits for clearing, grubbing, and/or stockpiling, the project's consulting biologist shall prepare and submit a report, documenting the results of the survey, to EPD for review. The preconstruction survey shall cover the project

site and any offsite improvements. In some cases, EPD may also require a Monitoring and Avoidance Plan prior to the issuance of a rough grading permit.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The County of Riverside Ordinance No. 559 regulates the removal of trees, and states "No person shall remove any living native tree on any parcel or property greater than one-half acre in size, located in an area above 5,000 feet in elevation and within the unincorporated area of the County of Riverside, without first obtaining a permit to do so, unless exempted by the provisions of Section 4 of this ordinance" (Riverside County 2000a).

As shown on Figure 3, *Aerial Photograph*, the Project Site is currently vacant and consists mainly of ruderal vegetation; the northeastern portion is primarily occupied by ornamental trees. Project development would require removal of these trees to make room for site improvements associated with the Project. However, the Project Site is at an elevation of approximately 1,490 feet and would not conflict with this ordinance.

Additionally, the Project's landscape plan includes the planning of a variety of ornamental trees along the western and northern ends of the Project Site (see Figure 4, *Conceptual Site Plan*). The number of trees proposed would be greater then the number of trees that would be removed.

Therefore, no impact would occur and no mitigation measures are necessary.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant Impact. The Following is a discussion of the Project's potential impacts on the Western Riverside County Multi Species Habitat Conservation Plan and Southwest Area Plan, in the Cactus Valley/Southwestern Riverside County Multi-Species Reserve/ Johnson Ranch Subunit.

Western Riverside County Multi Species Habitat Conservation Plan

The Western Riverside County Multi Species Habitat Conservation Plan (MSHCP) is a comprehensive, multijurisdictional habitat conservation planning program for western Riverside County, California. The purpose of the Western Riverside County MSHCP is to preserve native habitats, and to this end, the plan focuses on the habitat needs of multiple species rather than one species at a time. The Western Riverside County MSHCP provides coverage/take authorization for some species listed under the federal or state Endangered Species Act (ESA) as well as nonlisted special-status plant and wildlife species. It also provides mitigation for impacts to special status species and their associated habitats.

Through agreements with USFWS and CDFW, 146 listed and special-status plant and animal species receive some level of coverage under the Western Riverside County MSHCP. Of the 146 covered species, the majority have no additional survey needs or conservation requirements. Furthermore, the Western Riverside County MSHCP provides mitigation for project-specific impacts to these species, thereby reducing the degree of impact to below a level of significance, pursuant to CEQA.

3. Environmental Analysis

Several of the species covered under the Western Riverside County MSHCP have additional survey requirements. These include the riparian communities and associated species addressed in Section 6.1.2 of the Western Riverside County MSHCP ("Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools"), plants identified in Section 6.1.3 ("Narrow Endemic Plant Species"), and plants and animal species addressed in Section 6.3.2 ("Additional Survey Needs and Procedures").

The Project Site is located within the Western Riverside County MSHCP boundaries. The County, acting as the lead agency for the Project, is a permittee under the Western Riverside County MSHCP and, therefore, is afforded coverage under the state or federal ESAs for impacts to listed species covered by the plan. The County is required to document consistency with the Western Riverside County MSHCP in conjunction with any discretionary approvals for the Project. As such, a biological resources assessment was prepared for the Project Site (Appendix B) to provide all necessary information required to demonstrate Project consistency with the Western Riverside County MSHCP. Further, the Proposed Project shall comply with the Western Riverside County MSHCP Sections 6.1.4 Urban/Wildlands Interface Guidelines (UWIG). Pursuant to mitigation measures BIO-3 through BIO-6, lighting shall be directed away from the MSHCP conservation area(s) to the east to protect wildlife and other biological resources from direct night lighting. Compliance with UWIG and implementation of mitigation measures BIO-3 through BIO-5 would reduce lighting impacts to less than significant levels.

The project site is not located in plan-defined areas requiring surveys for invertebrate species, criteria area species, amphibian species, or mammalian species. However, the Project Site is located in plan-defined areas requiring surveys for narrow endemic plant species survey area (NEPSSA), criteria area species survey area (CASSA) for plant species, and burrowing owl (Athene cunicularia).

The Project Site is located in a NEPSSA for the following plant species: Munz's onion (Allium munzii), San Diego ambrosia (Ambrosia pumila), many-stemmed dudleya (Dudleya multicaulis), California Orcutt grass (Orcuttia californica), Spreading navarretia (Navarretia fossalis), Wright's trichocoronis (Trichocoronis wrightii var. wrightii). The project site is also in a CASSA for the following plant species: Parish's brittlescale (Atriplex parishii), Davidson's saltscale (Atriplex serenana var. davidsonii), Thread-leaved brodiaea (Brodiaea filifolia), Round-leaved filaree (Erodium macrophyllum), Smooth tarplant (Centromadia pungens ssp. laevis), Coulter's goldfields (Lasthenia glabrata ssp. coulteri), Little mousetail (Myosurus minimus ssp. apus), and Mud nama (Nama stenocarpa). However, no narrow endemic or criteria area plants were found during the focused rare plant surveys conducted for the Project Site in spring of 2023 (Appendix B).

Additionally, a habitat assessment was conducted on the Project Site for burrowing owl following Step 1 of the Burrowing Owl Survey Instructions for the Western Riverside MSHCP (Appendix B). The habitat assessment determined that the Project Site does provide suitable habitat for the species due to the presence of small mammal burrows that could be utilized as burrows. Therefore, Step 2 of the Western Riverside MSHCP Burrowing Owl Survey protocol was performed. No burrowing owl or burrowing owl sign was found on-site during the focused burrowing owl surveys. Based on the focused surveys, it was determined that burrowing owl do not currently occupy the Project site. However, since the Project Site does provide suitable habitat for a burrowing owl(s) that could occupy the site subsequent to the focused surveys being conducted, Mitigation

Measure BIO-6 is provided. The mitigation measure requires that a burrowing owl survey be conducted 30 days prior to any ground disturbance activities.

With implementation of Mitigation Measures BIO-3 through BIO-6, impacts would be less than significant. Therefore, the Project is consistent with the Western Riverside County MSHCP.

Mitigation Measures

BIO-3 Prior to building final inspections, Riverside County Environmental Programs Division shall conduct a site visit to verify that all lighting conforms to the approved lighting plan. All lighting must be either directed away or shielded to prevent artificial lighting from reaching sensitive natural resources or habitat (identified as RCA Conservation areas, Public Quasi Public lands or Riparian/Riverine habitat).

BIO-4 The proposed project shall comply with the Western Riverside Multiple-Species Habitat Conservation Plan (MSHCP) Sections 6.1.4 Urban/Wildlands Interface Guidelines (UWIG). Lighting shall be directed away from the MSHCP conservation area(s) to the east to protect wildlife and other biological resources from direct night lighting. Shielding shall be incorporated in the project design to ensure ambient lighting in the MSHCP Conservation Area(s), Public/Quasi-Public (PQP) Lands, and/or Riparian/Riverine/Vernal Pool areas do not increase over existing conditions. A lighting plan shall be submitted and approved by the Riverside County Environmental Programs Division prior to building permit issuance. A site visit may be required for verification purposes.

BIO-5 The proposed project shall comply with the Western Riverside Multiple-Species Habitat Conservation Plan (MSHCP) Sections 6.1.4 Urban/Wildlands Interface Guidelines (UWIG). Lighting shall be directed away from the MSHCP conservation area(s) to the east to protect wildlife and other biological resources from direct night lighting. Shielding shall be incorporated in project designs to ensure ambient lighting in the MSHCP Conservation Area(s), Public/Quasi-Public (PQP) Lands, and/or Riparian/Riverine/Vernal Pool areas do not increase. A lighting plan must be submitted to EPD for review and approval. The lighting plan must clearly demonstrate that all light fixtures are directed away or shielded from any sensitive natural resources or habitat.

BIO-6 Pursuant to Objectives 6 & 7 of the Species Account for the Burrowing Owl included in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), within 30 days prior to the issuance of a grading permit, including permits for clearing, grubbing, and/or stockpiling, a pre-construction presence/absence survey for the burrowing owl shall be conducted by a qualified biologist and the results provided in writing to the Riverside County Environmental Programs Department. The pre-construction survey shall cover the project site and any offsite improvements. If it is determined that the project site is occupied by the Burrowing Owl, take of "active" nests shall be avoided pursuant to the MSHCP and Migratory Bird Treaty Act. However, if a Burrowing Owl is present, relocation outside of the nesting season (February 1 through August 31) by a qualified biologist shall be required. The County

Biologist shall be consulted to determine appropriate type of relocation (active or passive) and translocation sites. A grading permit may be issued once the species has been relocated.

Cactus Valley/Southwestern Riverside County Multi-Species Reserve/ Johnson Ranch Subunit

The Project Site is located in the Southwest Area Plan, in the Cactus Valley/Southwestern Riverside County Multi-Species Reserve/ Johnson Ranch Subunit (SU4). The Project Site is within Criteria Cell 5567, Cell Group T. The target conservation acreage range for the Southwest Area Plan is between 58,295 and 72,155 acres. The target conservation range for the Cactus Valley/Southwestern Riverside County Multi-Species Reserve/ Johnson Ranch Subunit is between 4,395 and 7,970 acres. Conservation within Criteria Cell 5567 is described below as follows: "Conservation within Criteria Cell 5567 will contribute to Cell Group T and the assembly of Proposed Extension of Existing Core 7. Conservation within this Cell Group will focus on coastal sage scrub and grassland habitat. Areas conserved within this Cell Group will be connected to coastal sage scrub and grassland habitat proposed for conservation in Cell Group S to the north. Conservation within this Cell will range from 35 to 45 percent of the Cell focusing on the northern portion of the Cell Group."

According to current Riverside County GIS data, approximately 106.8 acres of Regional Conservation Authority (RCA) Western Riverside County Conserved Lands and 71.37 acres of Public/Quasi-Public (PQP) are within the approximately 321.45 acres of Cell Group T. In order to meet the conservation requirements for Cell Group T, 35 percent (112.5 acres) to 45 percent (144.65 acres) of coastal sage scrub and grassland habitat must remain conserved. Approximately a total of 55.43 percent (178.17 acres) of conserved lands including RCA and PQP land meet above the conservation goals of Cell Group T (refer to Figure 5, Reserve Assembly Analysis Map, of the biological resources assessment provided in Appendix B).

The Project Site resides in the western portion of Criteria Cell 5567, which does not contribute to the area reserved for conservation to the north of Cell Group T and does not connect to the area of proposed conservation to the north in Cell Group S. The Project Site is blocked by residential development to the north and the San Diego Aqueduct to the east, which does not allow contribution of land to Cell Group S to the north nor additional land to RCA conserved land to the east. Furthermore, the coastal sage scrub habitat on-site is too disturbed to contribute to land that would fulfill the conservation requirements for Cell Group T.

Therefore, the Project is consistent with the Cactus Valley/Southwestern Riverside County Multi-Species Reserve/ Johnson Ranch Subunit. Impacts would be less than significant and no mitigation measures are necessary.

3.5 CULTURAL RESOURCES

The analysis in this section is based in part on the following technical studies, included as Appendix C to this Initial Study:

- *Phase I Cultural Resources Assessment*, BCR Consulting LLC, March 2023

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally a resource is considered "historically significant" if it meets one of the following criteria:

i) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

ii) Is associated with the lives of persons important in our past;

iii) 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;

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

As shown on Figure 3, *Aerial Photograph*, the Project Site is vacant land and void of any buildings and structures, except for a steel pipe from the well site, a water tank, and livestock enclosures. The Project Site was previously developed with three modern buildings and three ancillary structures on the northern half of the Project Site, and with a well and water tank constructed near the eastern boundary between 1978 and 1985 (BCR 2024).

Additionally, prior to fieldwork being conducted for the Project Site, BCR Consulting requested an archaeological records search from the Eastern Information Center (EIC) at the University of California, Riverside as a part of the cultural resources assessment conducted for the Project Site (Appendix C). The records search completed a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources, and survey and excavation reports generated from the Project Site and sites within one half-mile of the Project Site. In addition, a review was conducted of the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), and documents and inventories from the California Office of Historic Preservation including the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Inventory of Historic Structures. The records research revealed that 16 cultural resource studies have been completed within the radius search, resulting in the recording of four cultural resources. One of the previous studies assessed the Project Site in 2004 for cultural resources but did not identify any cultural resources within the site.

Furthermore, an intensive pedestrian survey of the Project Site was conducted by BCR Consulting staff in April 2022. The field survey identified three historic-period wooden electrical distribution towers. Two of the towers were contained within a mostly modern electrical distribution alignment, oriented north/south along the eastern boundary of the Project Site; one tower was within a mostly modern electrical distribution alignment, oriented east/west along the southern boundary. Based on the results of this study, the resources are not eligible or potentially eligible for the California Register of Historical Resources. No other cultural resources were identified.

Based on the preceding, no impact to historical resources would occur and no mitigation measures are necessary.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less Than Significant Impact With Mitigation Incorporated. Archaeological resources are prehistoric or historic evidence of past human activities, including structural ruins and buried resources. As shown on Figure 3, *Aerial Photograph*, the Project Site is vacant land and void of any buildings and structures. The Project Site has been subject to disturbances related to mechanical clearing and grading associated with development on portions of the Project Site, including buildings and ancillary structures in addition to a well and water tank. However, given the undeveloped condition of the Project Site, the potential exists for Project development to impact unidentified archeological resources that may underly the site.

A cultural resources assessment was conducted for the Project Site by BCR Consulting (Appendix C). The purpose of the assessment was to determine the presence or absence of and potential impact on archaeological resources as a result of Project development. As noted above, BCR Consulting requested an archaeological records search from the EIC. The records search completed a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources, and survey and excavation reports generated from the Project Site and sites within one-half mile of the Project Site. The records research revealed that 16 cultural resource studies have been completed within the radius search, resulting in the recording of four cultural resources. One of the previous studies assessed the Project Site in 2004 for cultural resources but did not identify any cultural resources within the site.

Additionally, an intensive pedestrian survey of the Project Site was conducted by BCR Consulting staff in April 2022. As noted above, the field survey identified three historic-period wooden electrical distribution towers. However, based on the results of this study, the resources are not eligible or potentially eligible for the California Register of Historical Resources. No other cultural resources were identified. Also, the high level of disturbance throughout the Project Site confers low sensitivity for intact buried resources. Further, the results of the Sacred Lands File search conducted through the Native American Heritage Commission (NAHC) was negative, revealing no traditional cultural places within the Project Site boundaries.

Based on the results of the cultural resources records search, Sacred Lands File search and field survey of the Project Site, the cultural resources assessment concluded that no additional cultural resource work or monitoring is necessary. However, although the assessment has not indicated sensitivity for cultural resources within the Project Site boundaries, Project related ground-disturbing activities (e.g., grading and excavation) have the potential to reveal buried deposits not observed on the surface during previous surveys. Therefore, while unlikely, the presence of subsurface archaeological resources on the Project Site remains possible, and these could be affected by ground-disturbing activities associated with the Project.

However, implementation of Mitigation Measures CUL-1 and CUL-2 would avoid or minimize potential Project impacts to archaeological and tribal cultural resources. With implementation of Mitigation Measures CUL-1 and CUL-2, impacts to archeological and tribal cultural resources would be reduced to a less than significant level.

Mitigation Measures

CUL-1 Prior to the issuance of grading permits, the project applicant shall provide a letter to the Riverside County Planning Department from a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications for Archeology as defined at 36 CFR Part 61, Appendix A (Professional Archeologist). The letter shall state that the project applicant has retained such an individual, and that the consultant will be on call during all grading and other significant ground-disturbing activities.

In the event that potential archeological resources are discovered during ground-disturbing activities, all such activity shall cease in the immediate area of the find (within a 60-foot buffer), and the professional archeological monitor shall have the authority to halt any activities adversely impacting potentially significant cultural resources until they can be formally evaluated. Suspension of ground disturbances in the vicinity of the discovery shall not be lifted until the archaeological monitor has evaluated the discovery to assess whether it is classified as a significant cultural resource pursuant to the CEQA (California Environmental Quality Act) definition of historical (State CEQA Guidelines 15064.5[a]) and/or unique archeological resource (Public Resources Code 21083.2[g]). Work may continue in other areas of the Project Site outside of the buffered area and for other project elements while the encountered find is evaluated.

If upon completion of the assessment the archeological monitor determines that the find qualifies as a significant cultural resource, the qualified archeologist shall make recommendations on the treatment and disposition of the deposits, which shall be developed in accordance with all applicable provisions of California Public Resource Code Section 21083.2 and State CEQA Guidelines Sections 15064.5 and 15126.4. For example, if significant cultural resources are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan (MTP). The MTP shall be overseen and implemented by the archeologist and include mitigation measures to follow regarding identification and recording methods, and evaluation and final treatment of any cultural resources identified. Likely mitigations would involve temporary avoidance of the area of discovery plus a 60-foot buffer, development of a cultural resources eligibility evaluation plan in consultation with and the Riverside County Planning Department, and test excavation to determine eligibility of any discovery for California Register of Historical Resources listing eligibility. Final disposition of any artifacts recovered shall be determined during development of the evaluation plan and would be likely to include reburial onsite, donation to a Native American entity, or curation at a federally approved repository. The draft MTP, and any/all archaeological/cultural documents created (isolate records, site records, survey reports, testing reports, etc.), shall be provided to the Riverside County Planning Department. The archaeologist shall monitor the remainder of the Project Site and implement the MTP accordingly. The archaeologist shall prepare a final report describing all identified and curated resources (if any are found) and submit the report to the Riverside County Planning Department. If disturbed resources are required to be collected and preserved, the project

applicant shall be required to participate financially up to the limits imposed by Public Resources Code Section 21083.2.

CUL-2 Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this mitigation measure. Upon verification, the County Archaeologist shall clear this mitigation measure. This agreement shall not modify any condition of approval or mitigation measure.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. There are no known human remains or cemeteries on or near the Project Site. As shown on Figure 3, *Aerial Photograph*, the Project Site is vacant land and consists mainly of ruderal vegetation. The site is surrounded primarily by vacant land and residential uses. The immediate surrounding vicinity has also experienced ground disturbance associated with the development of existing buildings, roadways, and other urbanized land uses. Therefore, the likelihood that human remains may be discovered during site clearing and grading activities is considered extremely low. However, Project development would have the potential to disturb previously undiscovered subsurface human remains, if any exist. For example, the Project would involve excavation activities over the entire Project Site.

In the unlikely event that human remains are uncovered during ground-disturbing activities, California Health and Safety Code Section 7050.5 requires that disturbance of the site shall remain halted until the San Bernardino County Coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the California Public Resources Code. The coroner is required to make a determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority or has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) so that NAHC can contact the Most Likely Descendant (MLD). The MLD shall be provided access to the discovery and will provide recommendations or preferences for treatment of the remains within 48 hours of accessing the discovery site. Disposition of human remains and any associated grave goods, if encountered, shall be treated in accordance with procedures and requirements set forth in Sections 5097.94 and 5097.98 of the Public Resources Code; Section 7050.5 of the California Health and Safety Code; and CEQA Guidelines Section 15064.5.

Compliance with existing law regarding the discovery of human remains would reduce potential impacts to human remains to less than significant levels. No mitigation measures are necessary.

3.6 ENERGY

Would the project:

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

Less Than Significant Impact. The following discusses the potential energy demands from short-term construction and long-term operational energy consumption associated with the Project.

Short-Term Construction Impacts

Project construction would create temporary increased demands for electricity and vehicle fuels compared to existing conditions and would result in short-term transportation-related energy use.

Electrical Energy

Electricity use during construction of the Project would vary during different phases of construction. Construction of the Project would not require electricity to power most construction equipment. Electricity use during construction would vary during different phases of construction. The majority of construction equipment would be gas- or diesel-powered, and electricity would not be used to power most of the construction equipment. Later construction phases could result in the use of electricity-powered equipment for interior construction and architectural coatings. Therefore, Project-related construction activities would not result in wasteful or unnecessary electricity demands. Impacts would be less than significant and no mitigation measures are necessary.

Natural Gas Energy

It is not anticipated that construction equipment used for the Project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Transportation Energy

Transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. It is anticipated that the majority of off-road construction equipment, such as those used during demolition and grading, would be gas or diesel powered.

The use of energy resources by vehicles and equipment would fluctuate according to the phase of construction and would be temporary. In addition, all construction equipment would cease operating upon completion of Project construction. Thus, impacts related to transportation energy use during construction would be

temporary and would not require expanded energy supplies or the construction of new infrastructure. Furthermore, to limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. Construction trips would also not result in unnecessary use of energy since the Project Site is centrally located and is served by numerous regional freeway and highway systems (e.g., State Route 79) that provide the most direct routes from various areas of the region. Thus, energy use during construction of the Project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant and no mitigation measures are necessary.

Long-Term Operation Impacts

Operation of the Project would generate new demand for electricity, natural gas, and transportation energy on the Project Site. Operational use of energy would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems, use of on-site equipment and appliances; and indoor, outdoor, and perimeter lighting.

Electrical Energy

Operation of the Project would consume electricity for various purposes, including but not limited to heating, cooling, and ventilation of buildings, water heating, operation of electrical systems, lighting, and use of on-site equipment and appliances. Electrical service to the Project would be provided by Southern California Edison (SCE) through connections to existing off-site electrical lines and new on-site infrastructure. As shown in Table 4, implementation of the Project would result in 445,487 kilowatt hours of electricity use per year.

Table 4 Electricity Consumption

Land Use	Electricity (kWh/year)
Project Conditions	
Elementary School	351,384
Parking Lot	94,103
Total	445,487

Source: CalEEMod Version 2022.1.

While the Project would result in a higher electricity demand than existing conditions, it would be consistent with the requirements of the Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen). The proposed buildings would be in compliance with these standards and would generally have greater energy efficiency than the existing buildings. Encouraging sustainable and energy-efficient building practices and using more renewable energy strategies will further reduce building-related per capita energy consumption after buildout of the school campus and move closer toward achieving zero net energy. Compliance with these codes would decrease overall reliance on fossil fuels and increase reliance on renewable energy sources for electricity generation. Therefore, Project operation would not result in wasteful or unnecessary electricity. Impacts would be less than significant and no mitigation measures are necessary.

Natural Gas Energy

The potential natural gas consumption for the Project is shown in Table 5. As shown in the table, implementation of the Project would generate an average natural gas demand of 1,292,592 kilo British thermal units per year, primarily due to natural gas use by the proposed school classroom buildings.

Table 5 Natural Gas Consumption

Land Use	Natural Gas (kBTU/year)
Project Conditions	
Elementary School	1,292,592

Source: CalEEMod Version 2022.1
Note: kBTU = kilo British thermal units.

While the Project would result in an increase in natural gas compared to existing conditions, the new buildings would be consistent with the requirements of the Building Energy Efficiency Standards. Compliance with these energy efficiency standards would decrease overall reliance on fossil fuels, result in a decrease in natural gas consumption per building square foot, and increase reliance on renewable energy sources for electricity generation. Therefore, operation of the Project would result in a less than significant impact and no mitigation measures are necessary.

Transportation Energy

A typical new school development would consume transportation energy during operations from the use of motor vehicles associated with students, staff, and visitors to the campus. The efficiency of these motor vehicles

is unknown, such as the average miles per gallon. Estimates of transportation energy use are based on the overall vehicle miles traveled (VMT) and its associated transportation energy use. Because the Project involves relocation and increased student capacity of up to 900 students, it would serve the local population within the nearby surrounding communities, which may reduce vehicle miles traveled by providing a closer option for future students (EPD 2024). This feature of the Project would contribute to minimizing VMT and transportation-related fuel usage.

Additionally, fuel efficiency of vehicles during the Project's proposed buildout year would on average improve compared to vehicle fuel efficiencies experienced under existing conditions, thereby resulting in a lower per capita fuel consumption in 2025 assuming travel distances, travel modes, and trip rates remain the same. The improvement in fuel efficiency would be attributable to the statewide fuel reduction strategies and regulatory compliances (e.g., CAFE standards), resulting in new cars that are more fuel efficient and the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to land use development projects, but to car manufacturers. Thus, the school's students and staff do not have direct control in determining the fuel efficiency of vehicles manufactured and that are made available. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing the population of the Project Site's region more fuel-efficient vehicle options.

As electricity consumed in California is required to meet the increasing renewable energy mix requirements under the State's RPS and accelerated by SB 100, greater and greater proportions of electricity consumed for transportation energy demand envisioned under the Project would continue to be sourced from renewable energy sources rather than fossil fuels. Since vehicle fuel efficiencies would improve year over year through the buildout year of 2025 and result in a decrease in overall per capita transportation energy consumption, impacts would be less than significant and no mitigation measures are necessary.

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

No Impact. The state's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the state's renewable portfolios standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. Senate Bill 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures. On September 10, 2018, Governor Brown signed SB 100, which supersedes the SB 350 requirements. Under SB 100, the RPS for public owned facilities and retail sellers consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Additionally, SB 100 also established a new RPS requirement of 50 percent by 2026. The bill also established a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-

free electricity target. Moreover, SB 1020 was signed into law on September 16, 2022. It requires renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent by 2040. SB 1020 also requires all state agencies to procure 100 percent of electricity from renewable energy and zero-carbon resources by 2035 instead of 2045 previously mandated under SB 100.

The statewide RPS goal is not directly applicable to individual development projects, but to utilities and energy providers such as SCE, which is the utility that would provide all of electricity needs for the Project. Compliance of SCE in meeting the RPS goals would ensure the State in meeting its objective in transitioning to renewable energy. The Project would also comply with the latest Building Energy Efficiency Standards and CALGreen. Therefore, implementation of the Project would not conflict or obstruct plans for renewable energy and energy efficiency. No impact would occur and no mitigation measures are necessary.

County of Riverside Climate Action Plan Update (CAP Update)

Adopted by the County of Riverside in 2019, the CAP Update was prepared to establish a framework for evaluating and mitigating GHG emissions by providing an emissions inventory, emissions reduction goals, and strategies for reducing community-wide emissions (County of Riverside 2019). While most of the reduction measures under each strategy within the CAP Update apply specifically to municipal operations, County infrastructure improvements, or existing structures in the unincorporated areas of the County, the Project is consistent with the energy-related measures outlined in the CAP Update as shown in Table 6. Therefore, the Project would not interfere with implementation of the County's CAP Update. No impact would occur and no mitigation measures are necessary.

Table 6 County of Riverside CAP Update Consistency Checklist

Applicable GHG Reduction Measures		Consistency with CAP Update
Transportation		
R2-T1	Alternative Transportation Options: Alternative transportation includes taking transit and non-motorized transportation options, among them walking and bicycling, and variants such as small-wheeled transport such as skates, skateboards, push scooters and hand carts, and wheelchair travel. These modes provide both recreation and transportation, and can reduce VMT by removing automobiles from the road. This is an enhancement of Measures R2-T2, R2-T3, R2-T6, R2-T9, and R3- T1 proposed in the 2015 CAP. Potential actions for this measure include: ■ Electric vehicle charging (facilitate future installation of electric vehicle supply equipment) ■ Work with SCAG and the community to remove barriers to alternative transportation. ■ Create a "bike to work day" or "car-free zone day" and other County sponsored events to promote bicycling and other non-motorized transportation. ■ Create additional active transportation routes from transit centers to surrounding residential areas. ■ Implement reduced parking requirement in areas served by transit.	Consistent. As described in Section 3.17, *Transportation*, the Project would include the provision of new public sidewalks along Washington Street and Yates Road to increase pedestrian access for the school children, personnel, and visitors to access the Project Site safely and securely. Internal walkways to the Project Site would also be designed in accordance with and would help further the goals of the County's Safe Routes to school project. Additionally, pursuant to the provisions of the County Ordinance and the most current California Green Building Standards Code (CALGreen; Title 24, California Code of Regulations, Part 11), parking spaces for clean-air vehicles (total of 33) would be provided among the 148 spaces, with the 33 clean-air vehicle spaces set aside for electric vehicle charging. Finally, the Project would provide bicycle parking spaces near the main entrance of the proposed

3. Environmental Analysis

Table 6 County of Riverside CAP Update Consistency Checklist

		building in accordance with the provisions of Section 18.12 (Off-Street Vehicle Parking Standard), Section 18.12 (f)(2)(d) (Bicycle Parking Facilities) of the County Ordinance No. 348 .
Clean Energy		
R2-CE1	Clean Energy: Clean energy includes energy efficiency and clean energy supply options such as highly efficient combined heat and power as well as renewable energy sources. Installing solar photovoltaics panels on residential and commercial building rooftops is an effective way to produce renewable energy on-site. Moreover, when combined with energy storage systems, solar panels could continuously meet residential and commercial energy demand. The Riverside County Settlement Agreement requires that on-site renewable energy production (including but not limited to solar) shall apply to any tentative tract map, plot plan, or conditional use permit that proposes to add more than 75 new dwelling units of residential development or one or more new buildings totaling more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development. Renewable energy production shall be onsite generation of at least 20 percent of energy demand for commercial, office, industrial or manufacturing development, meet or exceed 20 percent of energy demand for multi-family residential development, and meet or exceed 30 percent of energy demand for single-family residential development. By identifying, designing, and implementing the clean energy measures and technology solutions, Riverside County would receive environmental and economic benefits, including reductions in GHG emissions. This is an enhancement of Measures R1-E6 and R3-E3 proposed in the 2015 CAP. Potential action for this measure includes: ■ Outreach to the community to promote clean energy incentives. ■ Require solar panel installation on new residential buildings (per conditions of the Settlement agreement described above). ■ Require solar panel installation on new commercial buildings and commercial parking lots (per conditions of the Settlement Agreement described above). Encourage energy storage system installation with solar panels.	Not Applicable. The Project includes the development of a new TK-8 charter school campus and would not fall in one of the land use types required by the Riverside County Settlement Agreement to supply on-site renewable energy production. However, the new buildings would be constructed using green building practices, including those of the latest California Building Energy Efficiency Standards and CALGreen. New buildings in compliance with these standards would generally have greater energy efficiency than existing buildings. Compliance with these codes would decrease overall reliance on fossil fuels.
Advanced Measures		
R2-L1	Tree Planting for Shading and Energy Saving: Trees and vegetation lower surface and air temperatures by providing shade and through evapotranspiration, making vegetation a simple and effective way to reduce urban heat islands. Shaded surfaces may be 20 to 45 degrees Fahrenheit ([°F], equal to 11 to 25 degrees Celsius [°C]) cooler than the peak temperatures of unshaded materials. In addition, evapotranspiration, alone or in combination with shading, can help reduce peak summer temperatures by 2 to 9 °F (or 1 to 5 °C). Trees and vegetation that directly shade buildings can reduce energy use by decreasing demand for air conditioning. This is an enhancement of Measure R3-L1 proposed in the 2015 CAP. Potential actions for this measure include:	Consistent. As further described in Section 1.5.4.1, *Landscaping*, the Project's landscape plan would feature landscaping along the campus perimeter and internal to the proposed campus, including along the building edges, within the parking areas and campus courtyards, and as a part of the natural turf areas and playfields. The site landscaping would include a variety of ornamental trees, shrubs, and groundcover that would help soften the massing of the buildings and provide shade on the school campus.

Table 6 County of Riverside CAP Update Consistency Checklist

	■ Work with the community to support nonprofit tree-planting groups within the County consisting of volunteers to plant and care for trees correctly and safely. ■ Develop and promote a County tree-planting program for new development at plan check.	
Water Efficiency		
R2-W2	Exceed Water Efficiency Standards: In addition to SB X7-7, more actions are being studied or have been taken to exceed water efficiency standards. These efforts include education and outreach practices that could be combined with residential and commercial actions that promote reuse or recycled water, use of grey water, and the collection and use of harvested rainwater. This is an enhancement of Measures R2-W1 and R2-W2 proposed in the 2015 CAP. Potential actions for this measure include: ■ Support water districts in direct outreach to homeowner associations, businesses, and other community groups to inform them on water efficiency standards. ■ Promote recycled or grey water for community uses such as residential landscaping. ■ Promote rainwater harvesting rebates and demonstrations.	Consistent. The Project would be required to comply with the provisions of CALGreen, which has requirements for indoor water use reduction and site irrigation conservation. For example, the Project would include drought tolerant landscaping with automatic irrigation systems and high efficiency plumbing fixtures to reduce water usage. As mentioned in Section 3.19, *Utilities and Service Systems*, the project applicant is required to implement the requirements of Article 6, *Water Conservation*, of EMWD's Administrative Code, and County Ordinance No. 859, *The Water Efficient Landscaping Requirements*, to reduce water consumption impacts.
Solid Waste		
R2-S1	Reduce Waste to Landfills: Increasing the recovery of recyclable materials will directly reduce GHG emissions. In particular, recycled materials can reduce the GHG emissions from multiple phases of product production, including extraction of raw materials, preprocessing, and manufacturing. This is County of Riverside Climate Action Plan Update 4-16 November 2019 an enhancement of Measures R1-S1, R2-S1, R3-S2, and R3-S3 proposed in the 2015 CAP. Potential actions for this measure include: ■ Outreach to the community to promote waste recycling and diversion. ■ Add additional recycling containers in public places. ■ Comply with Statewide waste reduction, recycling, and composting requirements. ■ Promote community clean-up days by providing commercial containers for trash and recycling.	Consistent. As mentioned in Section 3.19, *Utilities and Service Systems*, the Project would be required to implement the requirements of County Ordinance 745, *Compulsory Collection and Disposal of Solid Waste and Recyclable Material Within Specified Unincorporated Areas of Riverside County,* to comply with state law regarding solid waste management. Furthermore, the Project would be required to participate in an organic waste recycling program pursuant to the requirements of Assembly Bill (AB) 1826. Organic waste includes food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

3.7 GEOLOGY AND SOILS

The analysis in this section is based partly on the following technical studies, which are included as Appendices D and E, respectively, to this Initial Study.

- *Updated Geotechnical Report*, GeoTek, Inc., August 29, 2024.
- *Paleontological Resources Technical Report*, Department of PaleoServices, San Diego Natural History Museum, April 28, 2022.

3. Environmental Analysis

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. Surface rupture is the most easily avoided seismic hazard. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area of the fault zone where the fault breaks along the surface. The main purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to prevent construction of buildings used for human occupancy on the surface of active faults, in order to minimize the hazard of surface rupture of a fault to people and habitable buildings. Before cities and counties can permit development within Alquist-Priolo Earthquake Fault Zones, geologic investigations are required to show that the proposed development site is not threatened by surface rupture from future earthquakes.

The Project Site is not within or near an established Alquist-Priolo Earthquake Fault Zone. The nearest mapped active fault—that is, a fault that has ruptured during Holocene time (the last 11,700 years)— is the Wildomar Fault of the Elsinore fault zone, which is approximately 7.4 miles southwest of the Project Site (Appendix D). Due to the distance to the active fault, the potential for surface rupture of a fault onsite is considered negligible. Therefore, Project development would not subject people or structures to hazards arising from surface rupture of a known active fault. No impact would occur and no mitigation measures are necessary.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The most significant geologic hazard to the design life of the Project is the potential for moderate to strong ground shaking resulting from earthquakes generated on the faults in seismically active southern California. As with other areas in southern California, it is anticipated that the Project Site will likely be subject to strong ground shaking due to earthquakes on nearby faults. As noted above, the Wildomar Fault of the Elsinore fault zone is approximately 7.4miles southwest of the Project Site. This fault, as well as others in the region, are considered capable of producing strong shaking at the Project Site, thereby exposing people or structures onsite to potential substantial adverse effects, including the risk of loss, injury, or death. The intensity of ground shaking on the Project Site would depend on the magnitude of the earthquake, distance to the epicenter, and the geology of the area between the epicenter and the Project Site.

However, the Project Site is not at a greater risk of seismic activity or impacts than other sites in southern California. Seismic shaking is a risk throughout southern California. Additionally, the state regulates development in California through a variety of tools that reduce hazards from earthquakes and other

geologic hazards. The California Building Code (CBC; California Code of Regulations, Title 24, Part 2), adopted by reference in County Ordinance No. 457, which contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the Project Site. Project development would be required to adhere to the provisions of the CBC, which are enforced by the Riverside County Building and Safety Department during the building plan check and development review process. Compliance with the requirements of the CBC for structural safety during a seismic event would reduce hazards from strong seismic ground shaking.

Additionally, incorporation of the recommended design parameters from the geotechnical evaluation prepared for the Project (Appendix D) would reduce hazards from strong seismic ground shaking. The County would impose the recommended design parameters as a condition of approval, and compliance would be ensured through the County's building plan check and development review process.

In summary, compliance with the provisions of the CBC and implementation of the recommended design parameters outlined in the geotechnical engineering investigation report would reduce impacts resulting from strong seismic ground shaking. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon that occurs when soil undergoes a transformation from a solid state to a liquified condition. It refers to loose, saturated sand or silt deposits that behave as a liquid and lose their load-supporting capability when strongly shaken. Loose granular soils and silts that are saturated by relatively shallow groundwater are susceptible to liquefaction. When subjected to seismic ground shaking, affected soils lose strength during liquefaction and foundation failure can occur.

As stated in the geotechnical evaluation prepared for the Project (Appendix D), the absence of shallow groundwater at the Project Site and the presence of dense and cohesive subsurface soils underlain by dense metamorphic bedrock indicates that there is a low to very low hazard of liquefaction on the Project Site.

Furthermore, Project Site grading, design, and construction would conform with the recommended design parameters of the geotechnical evaluation prepared for the Project. The County would impose the recommended design parameters as a condition of any required planning approval, and compliance would be ensured through the County's building plan check and development review process.

Therefore, impacts would be less than significant and no mitigation measures are necessary.

iv) Landslides?

No Impact. Landslides are the downslope movement of geologic materials. Slope failures in the form of landslides are common during strong seismic shaking in areas of steep hills. Based on a review of a topographic map the Project Site is in an area of unincorporated Riverside County that is characterized by relatively flat topography and gently sloping hills (USGS 2015). The slopes of Bachelor Mountain rise east

of the San Diego Aqueduct to the summit of 2,556 feet above msl about 1.1 miles east of the Project Site (Riverside County 2022). Also, a review of regional geologic maps of the area does not indicate the presence of known or suspected landslides in the vicinity of the Project Site (GeoTek 2024). Furthermore, the Project Site is not in a zone of required investigation for earthquake-induced landslides (CGS 2018). Therefore, geologic hazards associated with landslides are not anticipated to occur at the Project Site. No impact would occur and no mitigation measures are necessary.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the project region include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earth-moving activities (e.g., excavation and grading) if erosion control measures are not used.

Following is a discussion of the potential erosion impacts resulting from the Project's construction and operational phases.

Construction Phase

Project development would involve site preparation, grading, and construction activities that would disturb soil and leave exposed soil on the ground surface. Common means of soil erosion from construction sites include water, wind, and being tracked offsite by vehicles. These activities could result in soil erosion. Additionally, natural processes, such as wind and rain, could further lead to soil erosion during construction.

However, development on the Project Site is subject to local and state codes and requirements for erosion control and grading during construction. For example, project development is required to comply with standard regulations, including South Coast Air Quality Management District Rules 402 and 403, which would reduce construction erosion impacts. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emissions source. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance offsite. For example, as outlined in Table 1 (Best Available Control Measures) of Rule 403, control measures to reduce erosion during grading and construction activities include stabilizing backfilling materials when not actively handling, stabilizing soils during clearing and grubbing activities, and stabilizing soils during and after cut-and-fill activities.

Additionally, the Construction General Permit (CGP; 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ) issued by the State Water Resources Control Board, regulates construction activities to minimize water pollution, including sediment risk from construction activities to receiving waters. Project development would be subject to the National Pollution Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which is further discussed in Section 3.10, *Hydrology and Water Quality*. The Project's construction contractor would be required to prepare and implement a SWPPP and associated best management practices

(BMPs) in compliance with the CGP during grading and construction. For example, as outlined in Section 3.10, types of BMPs that are incorporated in SWPPPs and would help minimize impacts from soil erosion include:

- **Erosion controls.** cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind. Erosion control BMPs include mulch, soil binders, and mats. Amongst other measures
- **Sediment controls.** Filter out soil particles that have been detached and transported in water. Sediment control BMPs include but are not limited to barriers, and cleaning measures such as street sweeping.
- **Tracking controls.** Tracking control BMPs minimize the tracking of soil offsite by vehicles; for instance, stabilizing construction roadways and entrances/exits.

Additionally, County Ordinance No. 484 (control of blowing sand) requires landowners whose soil consists of sand or sandy loam to provide protection (i.e., wind-breaks, walls, fences, planting, mitigation vegetation, watering or other methods) to prevent wind erosion of saif land onto public roads, or other public or private property. Based on the Web Soil Survey, the project site includes EcC2 (Escondido fine sandy loam), LpE2 (Lodo rocky loam), FwE2 (Friant fine sandy loam), and BkC2 (Buchenau silt loam), which contains sandy loam (USDA 2024). The proposed project would be required to adhere to County Ordinance No. 484. However, adherence to the BMPs in the SWPPP and adherence with state codes and requirements for erosion control and grading during construction would reduce, prevent, or minimize soil erosion from Project-related grading and construction activities, and meet the requirements of County Ordinance No. 484. Therefore, soil erosion impacts from Project-related grading and construction activities would be less than significant and no mitigation measures are necessary.

Operation Phase

The Project Site is relatively flat with gentle slopes (approximately two percent grade) to the northwest and consists primarily of vacant land. No major slopes or bluffs are on or adjacent to the Project Site. After Project completion, the Project Site would be developed with institutional uses, parking areas and drive aisles, a sports field, and roadway and landscape improvements and would not contain bare or exposed soil. The proposed landscaping would be water conserving and have deep root systems that enable soil stabilization and minimize erosion. Upon Project completion, the potential for soil erosion or the loss of topsoil would be expected to be extremely low. However, the proposed project would be required to adhere to County Ordinance No. 484, as described above.

Additionally, in accordance with the County's initial requirements for development projects, the Project would be implemented in accordance with a Water Quality Management Plan (WQMP) and abide by the requirements of the MS4 permit and the Technical Guidance Document. For example, project design and operation would include implementation of BMPs specified in the preliminary WQMP prepared for the Project (Appendix H), which would minimize runoff and soil erosion and siltation into stormwater. BMPs are discussed further in Section 3.10, *Hydrology and Water Quality*. Implementation of the BMPs would help ensure that soil erosion would not occur under the Project's operation phase. BMP implementation would be ensured through the County's building plan check and development review process.

Therefore, soil erosion impacts from the Project's operation phase would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Hazards from liquefaction are addressed above in Section 3.7.a.iii, and landslide hazards are addressed above in Section 3.7.a.iv. As concluded in these sections, impacts would be less than significant and no mitigation measures are necessary.

Following is a discussion of the potential impacts resulting from other site geologic and soil conditions of the Project Site.

Lateral Spreading

Lateral spreading is a phenomenon that occurs in association with liquefaction and includes the movement of non-liquefied soil materials. Due to the very low potential for liquefaction on the Project Site, the potential for lateral spreading is considered very low (Appendix D). Therefore, no impact would occur and no mitigation measures are necessary.

Ground Subsidence

The major cause of ground subsidence is the excessive withdrawal of groundwater. The Project Site overlies the Temecula Valley Groundwater Basin (Basin). The Basin is a large alluvial groundwater basin with storage in excess of 1,300,000 acre-feet. The basin has a long history of groundwater development for various uses dating back to the early 1900s. As a result, piezometric heads declined basin-wide during the past century; in some areas by more than 100 feet. The Santa Margarita River Watershed Watermaster (Watermaster), the agency responsible for groundwater basin management, has recognized that land subsidence and ground fissuring should be minimized to the extent possible. As a result of the policies enacted by the Watermaster, the Basin is considered a very low priority for sustainable groundwater management by the California Department of Water Resources (County of Riverside 2022).

Additionally, Project development would be implemented in accordance with the recommended design parameters of the geotechnical evaluation prepared for the Project (Appendix D). With implementation of the design parameters, which would be imposed by the County as a condition of approval and ensured through the County's building plan check and development review process, Project development would not subject people or structures to substantial hazards arising from ground subsidence.

Therefore, impacts would be less than significant and no mitigation measures are necessary.

Collapsible Soils

Collapsible soils shrink upon being wetted and/or being subject to a load. Soils susceptible to hydro-collapse (or collapsible soils) are predominately sand, silty sand, and sandy silt held in a loose honeycomb structure. This

relatively loose honeycomb structure is typically held together by small amounts of clay or calcium carbonate acting as a temporary cementing agent. If the soil remains dry the soil generally maintains its structure, however the addition of water to the soil will greatly weaken the honeycomb structure and the soil subsequently experiences immediate collapses. This collapse can result in rapid soil settlement and potential damage to any improvements which are located within the zone of influence of the collapsible soils. Fine-grained soils such as clays and silty clays are generally not considered susceptible to hydro-collapse.

Laboratory testing for hydro-collapse is typically performed per the American Society for Testing and Materials (ASTM) Test Method D5333 or ASTM D 2435. Soils with a collapse potential above five percent are considered troublesome. Project Site grading, design, and construction would conform with the design parameters of the geotechnical prepared for the Project (Appendix D). The County would impose the recommended design parameters as a condition of approval and compliance would be ensured through the County's building plan check and development review process.

Therefore, impacts would be less than significant and no mitigation measures are necessary.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils shrink or swell as the moisture content decreases or increases; the shrinking or swelling can shift, crack, or break structures built on such soils. Based on the results of previous laboratory testing and recent laboratory testing as provided in the geotechnical evaluation prepared for the Project (Appendix D), site soils are anticipated to have a low to very low expansion potential in accordance with ASTM D4829. Additionally, Project development would be required to incorporate the recommendations provided in the geotechnical evaluation and adhere to the provisions of the CBC. Therefore, impacts would be less than significant and no mitigation measures are necessary.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project would include construction of sewer laterals to existing sewers in surrounding roadways. The Project would not involve the use of septic tanks or other alternative wastewater disposal systems. Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact With Mitigation Incorporated. Paleontological resources are commonly known as fossils, that is, the recognizable physical remains or evidence of past life forms found on earth in past geological periods — including bones, shells, leaves, tracks, burrows, and impressions.

As shown on Figure 3, *Aerial Photograph*, the Project Site is currently vacant and is covered with light to moderate growth of ruderal vegetation. The Project Site has been subject to disturbances related to mechanical clearing and grading associated with development on portions of the Project Site, including buildings and ancillary structures in addition to a well and water tank. However, given the undeveloped condition of the Project Site,

the potential exists for Project development to impact unidentified paleontological resources that may underly the site.

A Paleontological Resources Technical Report was prepared for the Project Site by the Department of PaleoServices of the San Diego Natural History Museum (Appendix E). The report includes the results of institutional records searches conducted at the San Diego Natural History Museum and Western Science Center, and a paleontological field survey of the Project Site. As noted in the report, the Project Site is underlain by middle to early Pleistocene sandy alluvial valley deposits and Mesozoic phyllite. Older valley deposits may have the potential to contain significant paleontological resources. Based on a review of the online catalog of specimens from the San Diego Natural History Museum and Western Science Center, no documented localities of paleontological specimens are located within a mile of the Project Site. However, based on the report, the Pleistocene deposits on the northern portion of the Project Site have a high sensitivity for paleontological resources and the Mesozoic phyllite on the southern portion has an undetermined sensitivity for paleontological resources (as shown in Figure 11, Paleontological Sensitivity Map, of the Paleontological Resources Technical Report). Additionally, the Project Site is mapped in the County's General Plan as having a High potential for paleontological resources (fossils). Based on the findings of the report, the ground-disturbing activities of the Project could result in impacts to unknown buried paleontological resources. Therefore, implementation of a paleontological mitigation program, in the form of paleontological monitoring, is recommended for earthwork at the Project Site that could directly impact early to middle Pleistocene-age deposits or Mesozoic-age phyllite and is included as mitigation.

Based on the preceding, there is a potential for the Proposed Project to impact unknown paleontological resources during ground disturbing activities at the Project Site. However, implementation of Mitigation Measures GEO-1 and GEO-2 would avoid or minimize potential Project impacts to paleontological resources. With implementation of these mitigation measures, impacts to paleontological resources would be reduced to a less than significant level.

Mitigation Measures

GEO-1 The project applicant shall retain a qualified paleontologist approved by the County of Riverside to create and implement a project-specific plan for monitoring site grading/earthmoving activities (project paleontologist). The project paleontologist retained shall review the approved development and grading plans and conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the project paleontologist in a Paleontological Resource Impact Mitigation Program (PRIMP), which shall be submitted to the County Geologist for review and approval prior to the issuance of a grading permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standards and Society of Vertebrate Paleontology standards, are as follows:

- A corresponding and active County Grading Permit (BGR) Number must be included in the title of the report. PRIMP reports submitted without a BGR number in the title will not be reviewed.

- PRIMP must be accompanied by the final grading plan for the subject project.
- Description of the proposed site and planned grading operations.
- Description of the level of monitoring required for all earth-moving activities in the project area.
- Identification and qualifications of the qualified paleontological monitor to be employed for grading operations monitoring.
- Identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for recovery of large specimens.
- Direction for any fossil discoveries to be immediately reported to the property owner who in turn will immediately notify the County Geologist of the discovery.
- Means and methods to be employed by the paleontological monitor to quickly salvage fossils as they are unearthed to avoid construction delays.
- Sampling of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates.
- Procedures and protocol for collecting and processing of samples and specimens.
- Fossil identification and curation procedures to be employed.
- Identification of the permanent repository to receive any recovered fossil material. Pursuant the County "SABER Policy", paleontological fossils found in the County should, by preference, be directed to the Western Science Center in the City of Hemet. A written agreement between the property owner/project applicant and the repository must be in place prior to site grading.
- All pertinent exhibits, maps, and references.
- Procedures for reporting of findings.
- Identification and acknowledgement of the project applicant for the content of the PRIMP as well as acceptance of financial responsibility for monitoring, reporting and curation fees. The property owner and/or project applicant on whose land the paleontological fossils are discovered shall provide appropriate funding for monitoring, reporting, delivery and curating the fossils at the institution where the fossils will be placed and will provide confirmation to the County that such funding has been paid to the institution. All reports shall be signed by the qualified paleontologist responsible for the report's content. All reports shall also be signed by all other parties responsible for the report's content (e.g., Professional Geologist), as necessary A signed electronic copy of the report, project plans, and all required review applications shall be uploaded to the County's PLUS Online System. The following sources shall be used for this purpose:

- https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/Filing_Instructions_Paleontological_Report_Review_Application.pdf
- https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/PLUS_Online_Upload_Instructions_Paleontology.pdf
- https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/Supplemental_Information_Form_PALEO.pdf

Reports and/or review applications shall not to be submitted directly to the County Geologist, Project Planner, Land Use Counter, Plan Check, or any other County office. In addition, the project applicant shall submit proof of hiring (i.e., copy of executed contract, retainer agreement, etc.) a project paleontologist for the in-grading implementation of the PRIMP.

GEO-2 The project applicant shall submit a Paleontological Monitoring Report prepared for site grading operations at the project site. The report shall be certified by the professionally qualified paleontologist responsible for the content of the report. The paleontologist shall be on the County's Paleontology Consultant List. The report shall include the findings made during all site grading activities and an appended itemized list of fossil specimens recovered during grading (if any) and proof of accession of fossil materials into the pre-approved museum repository. In addition, all appropriate fossil location information shall be submitted to the Western Science Center, San Bernardino County Museum and Los Angeles County Museum of Natural History, at a minimum, for incorporation into their Regional Locality Inventories. A signed electronic copy of the report shall be uploaded to the County's PLUS Online System via the following source:

- https://planning.rctlma.org/sites/g/files/aldnop416/files/2023-06/PLUS%20Online%20Upload%20Instructions%20-%20Paleontology%20-%20Updated%20June%202023.pdf

Reports and/or review applications are not to be submitted directly to the County Geologist, Project Planner, Land Use Counter, Plan Check, or any other County office.

3.8 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG

identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[4]

Information on manufacture of cement, steel, and other "life cycle" emissions that would occur as a result of the Project are not applicable and are not included in the analysis.[5] Black carbon emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this pollutant in the state's Senate Bill 32 (SB 32) inventory and treats this short-lived climate pollutant separately.[6] A background discussion on the GHG regulatory setting and modeling can be found in Appendix A to this Initial Study.

Would the project:

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

Less Than Significant Impact. Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Project-related construction and operation-phase GHG emissions are provided in Table 7. As identified in the traffic analysis conducted for the Project, implementation of the Project would generate 655 net weekday vehicle trips (EPD 2024). Furthermore, operation of the Project would result in an increase in water demand, wastewater and solid waste generation, area sources (e.g., consumer cleaning products), and energy usage (i.e., natural gas and electricity). Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the Project. Overall, development and operation of the Project would not result in generating net annual emissions that exceed the South Coast AQMD bright-line threshold of 3,000 metric tons of carbon dioxide equivalent

[4] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

[5] Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (CNRA 2018). Because the amount of materials consumed during the operation or construction of the Project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

[6] Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, Air Quality. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017.).

($MTCO_2e$) per year (South Coast AQMD 2010), as demonstrated in Table 7. Therefore, the Project's cumulative contribution to GHG emissions would be less than significant and no mitigation measures are necessary.

Table 7 Project-Related Operation GHG Emissions

Source	GHG ($MTCO_2e$/Year)
Mobile (Vehicle Trips)[1]	997
Area	1
Energy	140
Water[2]	7
Solid Waste[3]	22
Refrigerants	<1
30-Year Construction Amortization[4]	15
Total	1,181
South Coast AQMD Bright-Line Threshold	3,000 $MTCO_2e$/Yr
Exceeds Bright-Line Threshold?	No

Source: CalEEMod, Version 2022.1.
Notes: MTons = metric tons; $MTCO_2e$ = metric ton of carbon dioxide equivalent
1. Net vehicle trips provided by EPD Solutions, Inc. (Appendix L).
2. Based on water and wastewater demand estimates from Section 3.10, *Hydrology and Water Quality*.
3. Based on solid waste estimates from Section 3.19, *Utilities and Service Systems.*
4. Total construction emission are amortized over 30 years per South Coast AQMD Working Group methodology.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan, the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A consistency analysis with these plans is presented below.

CARB Scoping Plan

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon (2022 Scoping Plan), which lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the State's anthropogenic GHG emissions (CARB 2022). The 2022 Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties or individual projects (i.e., the 2022 Scoping Plan does not require the city or county to adopt policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the state agencies outlined in the 2022 Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the LCFS and changes in the corporate average fuel economy standards (e.g., Pavley I and Pavley California Advanced Clean Cars program).

Buildout of the Project would adhere to the programs and regulations identified by the 2022 Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32, SB 32, and AB 1279. For example, the proposed charter school would serve the local population and could contribute to reducing VMT by providing the local community with closer options.

Therefore, the Project would be consistent with State efforts to reduce motor vehicle emissions and generate GHG emissions consistent with the reduction goals of AB 32, SB 32, and AB 1279. The Project would not obstruct implementation of the 2022 Scoping Plan, and a less than significant impact would occur.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for Southern California region that details the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecasted development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024). In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per-capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region.

The Connect SoCal Plan does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency for governments and developers. As mentioned previously, the Project would provide new facilities for future students and would serve the local population within the nearby surrounding communities. Serving the local community may reduce vehicle miles traveled by providing a closer option for future students. Therefore, the Project would not interfere with SCAG's ability to implement the regional strategies outlined in the Connect SoCal Plan. Impacts would be less than significant and no mitigation measures would be necessary.

Riverside County Climate Action Plan Update (CAP Update)

Adopted by the County of Riverside in 2019, the CAP Update was prepared to establish a framework for evaluating and mitigating GHG emissions by providing an emissions inventory, emissions reduction goals, and strategies for reducing community-wide emissions (County of Riverside 2019). Also, the CAP Update provides measures to meet the goal of reducing community-wide GHG emissions to a level 49 percent below baseline (2008) emissions for 2030 and 83 percent below baseline for 2050. Riverside County will also develop a post-2030 CAP to update the GHG reduction target for 2050 that would be consistent with broader state and federal reduction targets. Cumulatively, the state-wide and local measures presented in the CAP Update are estimated to reduce emissions in the County to 2,434,649 $MTCO_2e$ annually by 2030 and to 562,730 $MTCO_2e$ annually

by 2050. Both reduction in GHG emissions would meet and exceed the County's GHG reduction targets that would be consistent with State goals.

The CAP Update includes local reduction measures, which would be implemented primarily through the Screening Tables for New Development and with general plan policies. These local reduction measures are categorized by (1) transportation, (2) energy, (3) clean energy, (4) advanced measures, (5) water efficiency, and (6) solid waste.

As previously stated, the Project involves development of a new TK-8 charter school, featuring new buildings, multipurpose room for hosting sporting and special events, landscaping, parking areas, and vehicular and pedestrian access. As demonstrated in Table 8, the Project would be consistent with the applicable GHG reduction measures and would not interfere with implementation of the County's CAP Update. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Table 8 County of Riverside CAP Update Consistency Checklist

Applicable GHG Reduction Measures		Consistency with CAP Update
Transportation		
R2-T1	Alternative Transportation Options: Alternative transportation includes taking transit and non-motorized transportation options, among them walking and bicycling, and variants such as small-wheeled transport such as skates, skateboards, push scooters and hand carts, and wheelchair travel. These modes provide both recreation and transportation, and can reduce VMT by removing automobiles from the road. This is an enhancement of Measures R2-T2, R2-T3, R2-T6, R2-T9, and R3- T1 proposed in the 2015 CAP. Potential actions for this measure include: 1. Electric vehicle charging (facilitate future installation of electric vehicle supply equipment) 2. Work with SCAG and the community to remove barriers to alternative transportation. 3. Create a "bike to work day" or "car-free zone day" and other County sponsored events to promote bicycling and other non-motorized transportation. 4. Create additional active transportation routes from transit centers to surrounding residential areas. 5. Implement reduced parking requirement in areas served by transit.	Consistent. Project implementation would include the construction of new public sidewalks to increase pedestrian access for the school children, personnel, and visitors to access the main campus area safely. Internal walkways would also be designed in accordance with and would help further the goals of the County's Safe Routes to school project. Additionally, pursuant to the provisions of the County Ordinance and the most current California Green Building Standards Code (CALGreen; Title 24, California Code of Regulations, Part 11), parking spaces for clean-air vehicles (total of 33) would be provided among the 148 spaces to be provided onsite. Furthermore, Project development includes the provision of bicycle parking spaces near the main entrance of the proposed building in accordance with the provisions of Section 18.12 (Off-Street Vehicle Parking Standard), Section 18.12 (f)(2)(d) (Bicycle Parking Facilities) of the County Ordinance No. 348.
Clean Energy		
R2-CE1	Clean Energy: Clean energy includes energy efficiency and clean energy supply options such as highly efficient combined heat and power as well as renewable energy sources. Installing solar photovoltaics panels on residential and commercial building rooftops is an effective way to produce renewable energy on-site. Moreover, when combined with energy storage systems, solar panels could continuously meet residential and commercial energy demand. The Riverside County Settlement Agreement requires that on-site renewable energy production (including	Not Applicable. The Project would build a TK-8 school campus and would not fall in one of the land use types required by the Riverside County Settlement Agreement to supply on-site renewable energy production. However, the new buildings would be constructed using green building practices, including those of the latest California Building Energy Efficiency Standards

Table 8 County of Riverside CAP Update Consistency Checklist

	but not limited to solar) shall apply to any tentative tract map, plot plan, or conditional use permit that proposes to add more than 75 new dwelling units of residential development or one or more new buildings totaling more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development. Renewable energy production shall be onsite generation of at least 20 percent of energy demand for commercial, office, industrial or manufacturing development, meet or exceed 20 percent of energy demand for multi-family residential development, and meet or exceed 30 percent of energy demand for single-family residential development. By identifying, designing, and implementing the clean energy measures and technology solutions, Riverside County would receive environmental and economic benefits, including reductions in GHG emissions. This is an enhancement of Measures R1-E6 and R3-E3 proposed in the 2015 CAP. Potential action for this measure includes: 6. Outreach to the community to promote clean energy incentives. 7. Require solar panel installation on new residential buildings (per conditions of the Settlement agreement described above). 8. Require solar panel installation on new commercial buildings and commercial parking lots (per conditions of the Settlement Agreement described above). Encourage energy storage system installation with solar panels.	and CALGreen. New buildings in compliance with these standards would generally have greater energy efficiency than existing buildings. Compliance with these codes would decrease overall reliance on fossil fuels.
Advanced Measures		
R2-L1	Tree Planting for Shading and Energy Saving: Trees and vegetation lower surface and air temperatures by providing shade and through evapotranspiration, making vegetation a simple and effective way to reduce urban heat islands. Shaded surfaces may be 20 to 45 degrees Fahrenheit ([°F], equal to 11 to 25 degrees Celsius [°C]) cooler than the peak temperatures of unshaded materials. In addition, evapotranspiration, alone or in combination with shading, can help reduce peak summer temperatures by 2 to 9 °F (or 1 to 5 °C). Trees and vegetation that directly shade buildings can reduce energy use by decreasing demand for air conditioning. This is an enhancement of Measure R3-L1 proposed in the 2015 CAP. Potential actions for this measure include: 9. Work with the community to support nonprofit tree-planting groups within the County consisting of volunteers to plant and care for trees correctly and safely. 10. Develop and promote a County tree-planting program for new development at plan check.	Consistent. As further described in Section 1.5.4.1, *Landscaping*, the Project's landscape plan would feature landscaping along the campus perimeter and internal to the proposed campus, including along the building edges, within the parking areas and campus courtyards, and as a part of the natural turf areas and playfields. The site landscaping would include a variety of ornamental trees, shrubs, and groundcover that would help soften the massing of the buildings and provide shade on the school campus.
Water Efficiency		
R2-W2	Exceed Water Efficiency Standards: In addition to SB X7-7, more actions are being studied or have been taken to exceed water efficiency standards. These efforts include education and outreach practices that could be combined with residential and commercial actions that promote reuse or recycled water, use of grey water, and the collection and use of harvested rainwater. This is an enhancement of Measures R2-W1 and R2-W2 proposed in the 2015 CAP. Potential actions for this measure include:	Consistent. The Project would be required to comply with the provisions of CALGreen, which has requirements for indoor water use reduction and site irrigation conservation. For example, the Project would include drought tolerant landscaping with automatic irrigation systems and high efficiency plumbing fixtures to reduce water usage.

Table 8 County of Riverside CAP Update Consistency Checklist

	11. Support water districts in direct outreach to homeowner associations, businesses, and other community groups to inform them on water efficiency standards. 12. Promote recycled or grey water for community uses such as residential landscaping. 13. Promote rainwater harvesting rebates and demonstrations.	As mentioned in Section 3.19, *Utilities and Service Systems*, the project applicant is required to implement the requirements of Article 6, *Water Conservation*, of EMWD's Administrative Code, and County Ordinance No. 859, *The Water Efficient Landscaping Requirements*, of the County's Code of Ordinances to reduce water consumption impacts.
Solid Waste		
R2-S1	Reduce Waste to Landfills: Increasing the recovery of recyclable materials will directly reduce GHG emissions. In particular, recycled materials can reduce the GHG emissions from multiple phases of product production, including extraction of raw materials, preprocessing, and manufacturing. This is County of Riverside Climate Action Plan Update 4-16 November 2019 an enhancement of Measures R1-S1, R2-S1, R3-S2, and R3-S3 proposed in the 2015 CAP. Potential actions for this measure include: 14. Outreach to the community to promote waste recycling and diversion. 15. Add additional recycling containers in public places. 16. Comply with Statewide waste reduction, recycling, and composting requirements. 17. Promote community clean-up days by providing commercial containers for trash and recycling.	Consistent. As mentioned in Section 3.19, *Utilities and Service Systems*, the Project would be required to implement the requirements of County Ordinance 745, *Compulsory Collection and Disposal of Solid Waste and Recyclable Material Within Specified Unincorporated Areas,* of the County Ordinance to comply with state law regarding solid waste management. Also, the Project would be required to participate in an organic waste recycling program pursuant to the requirements of Assembly Bill (AB) 1826. Organic waste includes food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

Source: County of Riverside 2019.

3.9 HAZARDS AND HAZARDOUS MATERIALS

The analysis in this section is based partly on the following technical study, which is included as Appendices F, G and H, respectively, to this Initial Study.

- *Phase I Environmental Site Assessment Report,* Partner Engineering and Science, Inc., June 28, 2024.
- *Phase II Subsurface Investigation Report*, Partner Engineering and Science, Inc., September 3, 2024
- *Additional Subsurface Investigation Report*, Partner Engineering and Science, Inc., January 15, 2025

Would the project:

a) 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 term "hazardous material" can be defined in different ways. For purposes of this environmental document, the definition of "hazardous material" is the one outlined in the California Health and Safety Code, Section 25501:

> Hazardous materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant present or potential hazard to human health and safety or to the

> environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

"Hazardous waste" is a subset of hazardous materials, and the definition is essentially the same as in the California Health and Safety Code, Section 25117, and in the California Code of Regulations, Title 22, Section 66261.2:

> Hazardous wastes are those that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Hazardous materials can be categorized as hazardous nonradioactive chemical materials, radioactive materials, and biohazardous materials (infectious agents such as microorganisms, bacteria, molds, parasites, viruses, and medical waste).

Exposure of the public or the environment to hazardous materials could occur through but not limited to the following means: improper handling or use of hazardous materials or waste, particularly by untrained personnel; transportation accident; environmentally unsound disposal methods; and/or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

Following is a discussion of the Project's potential to create a significant hazard to the public or the environment through the routine use, storage, transport, or disposal of hazardous materials during the construction and operational phases.

Project Construction

Project construction activities would involve use of hazardous materials including cleansers and degreasers; fluids used in routine maintenance and operation of construction equipment, such as oil and lubricants; fertilizers; pesticides; and architectural coatings including paints. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature and would cease upon completion of the Project's construction phase.

Furthermore, the use, storage, transport, and disposal of construction-related hazardous materials would be required to conform to federal, state, and local requirements as set forth by the US Environmental Protection Agency (EPA), California Department of Toxic Substances Control (DTSC), the California Occupational Safety and Health Administration, California Department of Transportation (Caltrans), the Resource

Conservation and Recovery Act, and the Riverside County Department of Environmental Health[7]. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations for the cleanup and disposal of that contaminant. All contaminated waste would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility.

Based on the preceding, hazards to the public or the environment arising from the routine use of hazardous materials during Project construction would be less than significant and no mitigation measures are necessary.

Project Operation

The proposed activities of the Project do not involve the use of unusually large amounts of hazardous materials that could impact surrounding land uses. Project operation would involve the use of small amounts of hazardous materials, such as cleansers, paints, degreasers, adhesives, sealers, fertilizers, and pesticides for cleaning and maintenance purposes. Additionally, institutional facilities are not associated with activities that use, generate, store, or transport large quantities of hazardous materials; such uses generally include manufacturing, industrial, medical (e.g., hospital), and other similar uses.

Additionally, the use, storage, transport, and disposal of hazardous materials would be governed by existing regulations of several agencies, including EPA, Caltrans, California Division of Occupational Safety and Health, and Riverside County Department of Environmental Health. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts.

Furthermore, while highly unlikely due to the proposed use, in the event of a hazardous materials spill of greater amount or toxicity than onsite personnel could safely contain and clean up, assistance would be requested from the Riverside County Fire Department at Fire Station 83/French Valley Fire Station. As also mandated by the Occupational Safety and Health Administration, all Material Safety Data Sheets for any potentially hazardous project would be provided that inform employees and first responders as to the necessary remediation procedures in the case of accidental release.

[7] The Riverside County Department of Environmental Health is the Certified Unified Program Agency (CUPA) for Riverside County; the CUPA administers and makes consistent enforcement of several state and federal regulations governing hazardous materials and hazardous waste.

Based on the preceding, hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials during Project operation would be less than significant and no mitigation measures are necessary.

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?

Less Than Significant Impact With Mitigation Incorporated. Following is a discussion of the potential hazards impacts that could arise through the accidental release of hazardous materials from the Project's construction and operational phases.

Hazardous Materials Associated with Project Construction and Operation

See response to Section 3.9.a, above. As concluded in this section, hazards to the public or the environment arising from the routine use of hazardous materials during Project construction and operation phases would be less than significant and no mitigation measures are necessary. Additionally, the Project consists of the development of a school facility, which would not generate air toxics requiring an SCAQMD permit.

Hazardous Materials Associated with Project Site Conditions

As shown on Figure 3, *Aerial Photograph*, the Project Site is vacant land and void of any buildings and structures. According to available historical sources, the Project Site was formerly undeveloped from as early as 1938; developed residential with a farm including an equestrian facility by circa 1981; and demolished of all structures and in its current unimproved configuration with remaining concrete foundations since 2006. The Project Site is generally surrounded by residential development to the north beyond Yates Road, the San Diego Aqueduct to the east, vacant land to the west across Washington Street, and a single-family home on a large property to the south (see Figure 3).

The Phase I Environmental Site Assessment Report prepared for the Project Site (Appendix F) by Partner Engineering and Science, Inc. (Partner) involved a search of local, state and federal databases for known hazardous or contaminated material sites, a site reconnaissance, a review of historic aerial photographs, and research and interviews with representatives of the public, property ownership, site manager, and regulatory agencies. The purpose of the assessment was to evaluate the likelihood that hazardous materials may be present onsite as a result of on- or offsite activities. Following is a discussion of the Phase I finds regarding the potential for recognized environmental conditions to occur on-site.

Recognized Environmental Concern

The ASTM E 1527-21 Standard defines a Recognized Environmental Concern (REC) in part as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment." Based on the results of the Phase I, one REC was identified for the Project Site. Per the Phase I, a prior farm use on the site (Quality Farms) was listed with a 1,000-gallon regular product underground storage tank (UST). However, the exact age and location of the UST was not reported on the ERIS regulatory database searched. No records regarding the UST were

identified during online agency research by Partner. Partner submitted a Freedom of Information Act (FOIA) request to the Riverside County Department of Environmental Health (RCDEH) requesting further information; however, RCDEH never responded to Partners request. Based on the unknown disposition, the suspected UST on the Project Site represents a REC.

Subsequent to completion of the Phase I, Partner conducted a geophysical survey of the Project Site in July of 2024 to identify the location of the suspect UST. Based on the results of the geophysical survey, it appears that the subsurface features associated with the historical Quality Farms activities, which include the UST, were previously removed from the Project Site. As a result, Partner conducted a Phase II subsurface investigation in the area of the suspected UST, which consisted of soil and soil gas sampling. The purpose of the investigation was to evaluate the potential impact of petroleum hydrocarbons and/or volatile organic compounds (VOCs) to soil gas and/or soil as a consequence of a release or releases from the suspect former UST (Appendix G).

As concluded in the Phase II report, none of the analyzed soil samples had detectable concentrations of petroleum hydrocarbons or VOCs above applicable screening levels. Based on the lack of impacts in soil, there does not appear to be any environmental concern with respect to the former on-site UST.

Additionally, based on the lab results and analysis provided in the Phase II report, the concentration of 1,3-butadiene (a colorless gas that is easily condensed to a liquid) detected in soil gas does not pose a concern to human health.

Benzene was detected in the two analyzed soil gas samples at concentrations above the residential and commercial/industrial soil gas screening levels, which is considered a vapor intrusion concern. Benzene is a compound that is found in fuel, which corresponds with the former fuel UST. The borings where the soils gas sample were taken would be developed as a soccer field; therefore, there is no concern to human health due to the proposed improvement over this area. However, several modular buildings are proposed to be located just west of the soccer field (see Figure 4, *Conceptual Site Plan*). The detected benzene concentrations in soil gas may represent a concern to the users of the proposed modular buildings. As a result, additional soil investigation was conducted by Partner near the proposed location of the modular buildings with respect to vapor intrusion concerns.

As stated in the Additional Subsurface Investigation Report prepared for the Project Site (Appendix H), additional soil vapor sampling was performed to evaluate the extent of lateral and vertical impacts to sub surface soil vapor as well as evaluate the magnitude of said impacts for vapor intrusion risk to the occupants of the proposed school. In addition, soil samples were collected to address Riverside County Environmental Health Department comments (provided via email, November 5, 2024) regarding soil stockpiled in the northwestern portion of the Project Site, and two abandoned 55-gallon unlabeled drums on the southcentral portion of the Project Site, which were identified in the Phase I. Following is a discussion of the findings and conclusions of the additional soil investigation that was completed.

Soil Vapor

VOCs including tetrachloroethene (PCE), benzene, and bromodichloromethane were detected in soil gas samples collected at the maximum depths explored at concentrations exceeding the most conservative soil gas

screening levels (SGSLs). Available documentation shows no historical uses of PCE, chloroform, and/or bromodichloromethane on-site or at nearby properties. The presence of PCE in soil gas samples is not typically associated with UST releases. Other compounds including bromodichloromethane and chloroform are commonly found as disinfection byproducts associated with irrigation and/or tap water sources. Similarly, their presence in soil gas samples is not typically associated with UST releases. Detected compounds during this soil gas sampling event did not exceed their applicable industrial SGSLs with attenuation factor (AF) 0.001.

Additional soil gas sampling was performed on December 6, 2024, to delineate soil gas impacts to the approximate depths of the planned excavation area beneath the proposed school administration building (see Figure 4, *Conceptual Site Plan*, for proposed building location). Partner collected up to seven soil gas samples including one duplicate from soil gas probes SG13 through SG15. PCE was detected in only one soil gas sample (SG15 at 15 feet bgs) at a concentration of 8 ug/m3, which is below the most conservative SGSL. Benzene was detected in each soil gas sample at concentrations exceeding the most conservative SGSL. Other fuel associated compounds including toluene, ethylbenzene, and xylenes were detected at low concentrations. Detection of fuel compounds including benzene, toluene, ethylbenzene, and xylenes are typically associated with UST releases; however, detected concentrations of these compounds and benzene did not exceed their applicable industrial SGSL with AF of 0.001.

VOCs and total petroleum hydrocarbons (TPH) were detected at low concentrations below applicable screening levels. The presence of these compounds in soil samples indicates that there may have been minor fuel compound releases to the subsurface; however, it is not clear that these releases originated from the former on-site UST. Soil samples from soil probes SG14, SG16 and SG17 with detected concentrations of fuel constituents are located in excess of 100 feet laterally from the approximate former UST location. Soil samples B1 and B2 collected during previous sampling activities (Phase II soil investigation, provided as Appendix G) did not have detections of fuel constituents and were in closer proximity (less than 100 feet) to the approximate former UST location.

As stated in the Additional Subsurface Investigation Report, it is anticipated that detected concentrations of VOCs in soil gas will dissipate during earth moving activities. VOC concentrations in soil gas samples were below the applicable SGSL with AF of 0.001 that is appropriate for new building construction. The proposed slab-on-grade administration building with newly constructed concrete foundation is anticipated to reduce vertical migration of remaining VOCs in soil gas from the subsurface to indoor air. At the proposed modular buildings (see Figure 4 for proposed location of modular buildings), the crawl space separating the ground surface from the floor level of the modular buildings should be adequately ventilated to dilute vapors that may migrate from the subsurface to the crawlspace. Also, as a part of the project development the modular buildings will be placed on top of an asphalt surface, which will provide greater attenuation of any possible soil vapors compared to under a bare soil testing scenario.

No further investigations was recommended at this time by Partner; however, soil gas sampling should be performed after grading activities have been completed within the areas of the proposed administrative building footprint to confirm that the observed soil vapor impacts have adequately dissipated. Also, air sampling of the crawl space beneath a pilot modular building platform placed on graded soil should be performed as a conservative testing measure.

3. Environmental Analysis

Further, to reduce potential vapor intrusion to the administration building, the alluvium soil and approximately three feet into the weathered bedrock under the building footprint will be excavated and moved as backfill in the open areas of the Project Site. The excavated area will be backfilled from planned cut material, extending up to 10 feet into the weathered bedrock from the southeast proportion of the Project Site.

Based on the presence of VOC and TPH compounds in soil and soil vapor samples and the historical presence of a UST at the Site, the potential exists that these compounds may be encountered in soil during earthmoving activities at the Project Site. However, to ensure that impacts do not occur, Mitigation Measure HAZ-1, which include preparation of a soil management plan, has been included.

Soil Stockpiles

Soil samples collected from the stockpile areas were analyzed for VOCs, TPH, metals, asbestos and polychlorinated biphenyls (PCBs). VOCs and/or TPH were not detected above laboratory reporting limits in any stockpile soil samples. Metals including barium, beryllium, total chromium, cobalt, copper, lead, mercury, nickel, vanadium, and zinc were detected in each of the five stockpile soil samples at concentrations exceeding laboratory method detection levels (MDLs), but below applicable DTSC Regional Screening Levels. The detected concentrations of metals are generally typical of background concentrations of metals in soil. Asbestos and PCBs were not detected above laboratory MDLs in stockpile soil samples. Based on the analytical results, the soil stockpiles are deemed suitable for unrestricted use and may be reused on-site as backfill. Additional conditions not under consideration (e.g., physical soil/geotechnical properties) may limit the on-site reuse of soil from stockpiles deemed suitable for unrestricted use.

Drums

Regarding the on-site drums, TPH, metals, and VOCs were not detected at concentrations exceeding conservative screening levels in soil samples collected near the two drums with unknown contents at the site. Partner recommends that the drum contents be further investigated by a qualified hazardous materials technician for appropriate characterization, removal, and disposal of drum and/or drum contents. Drum contents should be evaluated for characteristic hazardous waste in accordance with California Code of Regulations, Title 22, Division 4.5 and Code of Federal Regulations, Title 40, which includes ignitability, corrosivity, reactivity, and toxicity. Sampling and analysis of materials and wastes, for hazardous waste identification purposes, should be in accordance with US EPA SW-846. Drum content evaluation should be performed prior to starting any earthmoving activities on the Project Site. To ensure that the drum contents are adequately analyzed, handled and disposed of, Mitigation Measures HAZ-2 has been included.

Historic Recognized Environmental Concern

Additionally, the ASTM E 1527-21 Standard defines a Historic HREC as "a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)." Based on the results of the Phase I, no HRECs were identified for the Project Site.

Controlled Recognized Environmental Concern

The ASTM E 1527-21 Standard also requires the identification of Controlled RECs (CRECs). The ASTM Standard defines CRECs as "a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)." Based on the results of the Phase I, no CRECs were identified for the Project Site.

Conclusion

Based on the preceding, impacts related to RECs would be reduced to a level of less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2.

Mitigation Measures

HAZ-1 Any earthmoving activities resulting in disturbances to subsurface soils within the project site shall be managed in accordance with a site-specific Soil Management Plan (SMP), which shall be prepared and submitted to the Riverside County Department of Environmental Health (RCDEH) prior to the commencement of any earthmoving activities. The SMP shall include preparation of a report to be submitted to the RCDEH for review and approval. An environmental professional representative should be on-site during earthmoving activities to monitor affected areas in accordance with the SMP and shall also be in attendance during pre-earthmoving activities (e.g., pre-construction meeting, kick-off meeting, etc.) to convey responsibilities and scope of work to each involved project team member pursuant to the SMP. The SMP shall include the following measures:

- Screening, handling, and managing soil during excavation activities.
- Application of South Coast Air Quality Management District Rule 1166 for the Site related to the potential for VOC-impacted soils to be encountered during excavation activities.
- Identification of suspected impacted soil.
- Managing and stockpiling excavated and graded soil (e.g., dust control, stockpile maintenance).
- Collecting and analyzing samples from stockpiled soil as necessary for waste characterization.
- Specifying threshold levels to evaluate whether excavated soil is suitable for on-site reuse.
- Handling/disposal of soil with confirmed impacts.

- Handling and transportation of site soils with respect to sensitive receptors in the vicinity of the site (e.g., schools, religious centers, residents).
- Addressing subsurface features of potential environmental concern (e.g., abandoned USTs, oil wells, sumps, clarifiers, buried drums) in the event they are encountered during excavation activities.
- Protocol for contractors for keeping potentially impacted soils from contacting stormwater at and/or the groundwater beneath the site.

HAZ-2 The contents of the two abandoned 55-gallon unlabeled drums on the southcentral portion of the project site hall be evaluated for characteristic hazardous waste in accordance with California Code of Regulations, Title 22, Division 4.5 and Code of Federal Regulations, Title 40, which includes ignitability, corrosivity, reactivity, and toxicity. Sampling and analysis of materials and wastes, for hazardous waste identification purposes, shall be in accordance with US EPA SW-846. Drum content evaluation shall be performed prior to the commencement of any earthmoving activities on the project site.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. Based on a review of Google Earth, two school sites are identified within a quarter mile of the Project Site. Temecula Preparatory School and Temecula Valley Charter School are located approximately 0.15 miles northwest of the Project Site (see Figure 3, *Aerial Photograph*). Additionally, as substantiated in Sections a and b, above, the Project does not include elements or aspects that would create or otherwise result in hazardous emissions. Therefore, no impact would occur and no mitigation measures are necessary.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The Environmental Risk Information Services (ERIS) electronic database service was used to complete the environmental records review of the Project Site (Appendix F). As demonstrated through ERIS, the Project Site was listed on three of the regulatory databases searched. However, based on a review of Riverside County's Map My County website, the addresses for the three entries that ERIS attributed to the Project Site are actually located northeast of the Project Site. Therefore, the Project Site is not listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur and no mitigation measures are necessary.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles or a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The nearest public-use airport to the Project Site is French Valley Airport, which is approximately 2.8 miles to the southwest (Airnav 2024). The Riverside County Airport Land Use Compatibility Plan Policy

Document, adopted in 2007 for the airport, sets forth safety zones where land uses are regulated to minimize air crash hazards to people on the ground. Per the airport land use compatibility plan, the Project Site is outside of such safety zones (RCALUC 2007). Therefore, no impact would occur and no mitigation measures are necessary.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. Riverside County has a Local Hazard Mitigation Plan (LHMP) and an Emergency Management Program for emergency response within Riverside County. The County's Emergency Notification System, Alert RivCo, provides information, training, and community-wide outreach to residents, businesses, visitors, and community organizations to better equip themselves and others in the event of a disaster or emergency. Furthermore, Riverside County has an established Emergency Operation Plan.

The County's Emergency Management Program utilizes the Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS). Both SEMS and NIMS are emergency management systems that provide a consistent template for all levels of government, nongovernmental organizations, and the private sector to work together to prevent, protect against, respond to, recover from, and mitigate the effects of incidents, regardless of their cause, size, location, or complexity.

The County's Fire, Sheriff, Public Works, Animal Control, public transit as well as water, power, and communications companies along with other non-government organizations handle smaller incidents that occur on a day-to-day basis. For large incidents, the County's Emergency Management Department coordinates a multi-agency response. The Riverside County Emergency Management Department provides Emergency Management services to Riverside County through the provision of an Emergency Operations Center (EOC) Manager. The EOC Manager is responsible for the overall function of the EOC, and the EOC Director is responsible for development of the County's disaster plans, disaster training and exercise program, and oversight of the County's EOC.

The Project involves the development of a new charter school and would have no impact on emergency response or evacuation plans. During the construction and operation phases, the Project would not interfere with any of the daily operations of the Riverside County Fire Department, Sheriff's Department, or EOC which support emergency planning and response efforts in Riverside County. All construction activities would be required to be performed per the County's standards and regulations. The Project would be required to provide the necessary on- and offsite access and circulation for emergency vehicles and services during the construction and operation phases.

The Project would also be required to go through the County's development review and permitting process and would be required to incorporate all applicable design and safety standards and regulations in the CBC to ensure that Project development does not interfere with the provision of local emergency services (provision of adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.).

Based on the preceding, implementation of the Project (both the construction and operational phases) would not impair implementation of or physically interfere with emergency response or evacuation plans. Therefore, no impact would occur and no mitigation measures are necessary.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. A wildland fire hazard area is typically characterized by areas with limited access, rugged terrain, limited water supply, and combustible vegetation. As shown on Figure 3, *Aerial Photograph*, the Project Site is in an urbanizing area of Riverside County with surrounding uses consisting of institutional and residential development and vacant land. The Project Site is within a Moderate to High Fire Hazard Severity Zone mapped by the California Department of Forestry and Fire Protection (CAL FIRE 2024). The Project Site has good access and would be served by adequate water infrastructure. Although there is combustible wildland vegetation currently on the Project Site, Project design would comply with the California Building Code, and the California Fire Code. Project development would also involve removal of all existing vegetation and introduce hardscape and landscape improvements through the Project Site. Therefore, impacts would be less than significant and no mitigation measures are necessary.

3.10 HYDROLOGY AND WATER QUALITY

The analysis in this section is based partly on the following technical studies, which are included as Appendices D, H, and I, respectively, to this Initial Stud:

- *Updated Geotechnical Report*, GeoTek, Inc., August 29, 2024.
- *Preliminary Water Quality Management Plan*, JLC Engineering and Consulting, Inc, January 2025.
- *Hydrology and Hydraulic Study,* JLC Engineering and Consulting, Inc., January 2025.

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The Project Site is in the Murrieta Creek watershed, a sub watershed of the Santa Margarita watershed. The Murrieta Creek watershed is a 220 square mile drainage area that contributes flow to Murrieta Creek. The area is generally bounded by the Domenigoni Valley, Sage Road, the Pauba Valley, and the Santa Rosa Mountains. Lake Skinner is in the middle of the drainage area (RCBD 1986).

Water quality for the Project Site is regulated by the San Diego Regional Water Quality Control Board (RWQCB) and its Water Quality Control Plan (Basin Plan), which contains water quality standards and identifies beneficial uses (wildlife habitat, agricultural supply, fishing, etc.) for receiving waters along with water quality criteria and standards necessary to support these uses consistent with federal and state water quality laws.

All runoff from the Project Site is ultimately tributary to the Santa Margarita by way of Murrieta Creek, which is approximately nine miles southwest of the Project Site.

Impacts to water quality of receiving waters generally range over three different phases of a development project:

- During the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest.
- Following construction and before the establishment of ground cover, when the erosion potential may remain relatively high.
- Following project completion, when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.

Following is a discussion of the potential water quality impacts resulting from urban runoff that would be generated during the construction and operational phases of the Project.

Project Construction

Construction-related runoff pollutants are typically generated from waste and hazardous materials handling or storage areas, outdoor work areas, material storage areas, and general maintenance areas (e.g., vehicle or equipment fueling and maintenance, including washing). The Project's construction phase may cause deterioration in the quality of downstream receiving waters if construction-related sediments or pollutants wash into the existing storm drain system and facilities in the area.

Construction-related activities that are primarily responsible for sediment releases are related to exposing previously stabilized soils to potential mobilization by rainfall/runoff and wind. Such activities include removing vegetation from the site, grading the site, and trenching for infrastructure improvements. Environmental factors that affect erosion include topographic, soil, and rainfall characteristics. Non-sediment-related pollutants that are also of concern during construction relate to non-stormwater flows and generally include construction materials (e.g., paint and stucco); chemicals, liquid products, and petroleum products used in building construction or the maintenance of heavy equipment; and concrete and related cutting or curing residues. Construction-related activities of the Project would generate pollutants that could adversely affect the water quality of downstream receiving waters if appropriate and effective stormwater and non-stormwater management measures are not used to keep pollutants out of and remove pollutants from urban runoff.

Construction projects of one acre or more are regulated under the Statewide Construction General Permit (CGP), Order No. 2022-0057-DWQ, issued by the State Water Resources Control Board in 2022. Projects obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters and specifying BMPs that would be used by the project to minimize pollution of stormwater. Categories of BMPs used in SWPPPs are described in Table 9.

3. Environmental Analysis

Table 9 Construction Best Management Practices

Category	Purpose	Examples
Erosion Controls	Protects the soil surface and prevents soil particles from being detached by rainfall, flowing water, or wind.	Scheduling, preserving existing conditions, mulch, soil binders, geotextiles, mats, hydroseeding, earth dikes, swales, velocity dissipating devices, slope drains, streambank stabilization, compost blankets, soil preparation/roughening, and non-vegetative stabilization.
Sediment Controls	Traps soil particles after they have been detached and moved by rain, flowing water, or wind.	Barriers such as silt fences, straw bales, sandbags, fiber rolls, and gravel bag berms; sediment basins; sediment traps; check dams; storm drain inlet protection; compost socks and berms; biofilter bags; manufactured linear sediment controls; and cleaning measures such as street sweeping and vacuuming
Wind Erosion Controls	Minimizes dust nuisances.	Applying water or other dust palliatives to prevent or minimize dust nuisance, reducing soil-moving activities during high winds, and installing erosion control BMPs for temporary wind control.
Tracking Controls	Prevents or reduces the tracking of soil offsite by vehicles	Stabilized construction roadways and construction entrances/exits and entrance/outlet tire wash.
Non-Storm Water Management Controls	Prevents pollution by limiting or reducing potential pollutants at their source or eliminating off-site discharge. Prohibits illicit connections or discharges.	Water conservation practices, BMPs specifying methods for: dewatering operations; temporary stream crossings; clear water diversions; pile driving operations; temporary batch plants; demolition adjacent to water; materials over water; potable water and irrigation; paving and grinding operations; cleaning, fueling, and maintenance of vehicles and equipment; concrete curing; concrete finishing.
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Proper material delivery and storage and material use, spill prevention and control, stockpile management, contaminated soil management, and management of solid, concrete, sanitary/septic, liquid, and hazardous wastes.

Source: CASQA 2019.

The Project's construction contractor would be required to prepare and implement a SWPPP and associated BMPs in compliance with the CGP during grading and construction. The SWPPP would specify BMPs, such as those outlined in Table 9, that the construction contractor would implement to protect water quality by eliminating and/or minimizing stormwater pollution prior to and during grading and construction and show the placement of those BMPs. Project construction activities would also be implemented in accordance with the requirements of the adopted 2022 CBC, of the County Ordinance No. 457.

Adherence to the BMPs in the SWPPP and the County Ordinance requirements would reduce, prevent, minimize, and/or treat pollutants and prevent degradation of downstream receiving waters. BMPs identified in the SWPPP would reduce or avoid contamination of stormwater with sediment and other pollutants such as trash and debris; oil, grease, fuels, and other toxic chemicals; paint, concrete, asphalt, bituminous[8] materials, etc.; and nutrients.

Based on the preceding, water quality and waste-discharge impacts from Project grading and construction activities would be less than significant and no mitigation measures are necessary.

Project Operation

Operational-related activities of the Project (e.g., runoff from parking areas, solid waste storage areas, and landscaped areas) would generate pollutants that could adversely affect the water quality of downstream receiving waters if effective measures are not used to keep pollutants out of and remove pollutants from urban runoff.

Standards governing discharges to stormwater from the Project Site are regulated by the San Diego Regional Municipal Stormwater (MS4) Permit Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100. The County of San Diego issued a Low Impact Development (LID) Handbook in 2014 to provide direction to project proponents on the regulatory requirements applicable to a private or public development activity. The LID Handbook includes instructions on selecting BMPs for a project.

LID is a stormwater management and land development strategy that combines a hydrologically functional site design with pollution prevention measures to compensate for land development impacts on hydrology and water quality. LID techniques mimic the site predevelopment hydrology by using site design techniques that store, infiltrate, evapotranspire, biofilter, or detain runoff close to its source. Source control BMPs reduce the potential for pollutants to enter runoff and are classified in two categories—structural and nonstructural. Structural source control BMPs have a physical or structural component, such as inlet trash racks, trash bin covers, and an efficient irrigation system, to prevent pollutants from contacting stormwater runoff. Nonstructural source control BMPs are procedures or practices used in project operation, such as stormwater training or trash management and litter control practices.

Project development would be required to comply with the requirements set forth in the MS4 Permit and the LID Handbook. As a part of the Project, the project applicant prepared a Preliminary Water Quality Management Plan (WQMP) for County review (Appendix H). The Project is a priority project defined as a new development involving the creation of 10,000 square feet (SF) or more of impervious surface collectively over the entire site. Priority projects are required to retain 100 percent of the stormwater design capture volume

[8] Bituminous = resembling or containing bitumen; bitumen = any of various viscous or solid impure mixtures of hydrocarbons that occur naturally in asphalt, tar, mineral waxes, etc.; used as a road surfacing and roofing material.

(DCV)[9] onsite through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination thereof.

The WQMP specifies BMPs that would be implemented to minimize water pollution from the Project Site during the operation phase. BMPs identified in the WQMP include source control measures and stormwater quality control measures. A detailed list of the BMPs and discussion of how they were selected based on their effectiveness to address and mitigate the Project's pollutants of concern are provided in the WQMP. The final BMPs to be implemented for the Project would be determined through the County's review of the final WQMP, which would occur during the County's development review and building plan check process.

The Project Site is a marginally developed property and does not have any natural drainage corridors onsite (see Figure 8, *Pre-Project Hydrology*). The Project Site flows from east to west and no buildings or structures exist on the on-site. The existing infiltration rates within the Project Site are extremely low (JLC 2025a).

Under Project development, the Project Site would be comprised of approximately 67 percent of impervious surface area (e.g., buildings, asphalt parking, hardcourts) and approximately 43 percent of pervious surface area (e.g., playfield, open lawn areas). Project development would be consistent with existing conditions in terms of the overall drainage pattern, continuing to flow to the west via new onsite drainage collection, conveyance, and treatment systems.

The proposed storm drain system is composed of five lines and laterals throughout the Project Site that would pick up drainage captured by onsite downspouts, grates, and curb inlets (JLC 2025b). Captured site runoff would be conveyed to a proposed system of catch basins, a subsurface system (Stormtech System), and a modular wetland system (MWS) (JLC 2025a). The MWS would treat the DVC, and the subsurface system would be used to meet hydromodification requirements and to reduce the post-development 100-year flow rates to pre-development flow rates. Additionally, the Project development includes improvements along Washington Street and Yates Road. The proposed on-site storm drain system would connect to two existing storm drains (Line B and Lateral B2) located on the southerly side of Yates Road. These storm drains connect to an existing storm drain located along Washington Street that discharges directly into Benton Creek Channel at Washington Street and Shrimp Lane (see Figure 9, *WQMP Site Plan*).

As shown in Figure 9, and for the purposes of the WQMP analysis, the Project Site includes Drainage Management Area (DMA) A1, A2, and A3. DMAs AA1 and B2[10] are offsite and include the improvements along Washington Street and Yates Road. The WQMP calculated a required DCV of 10,425 cubic feet for these DMAs. The total storage volume for the proposed LID BMPs is approximately 10,629 cubic feet, which meets the required storage volume (JLC 2025a).

[9] The design storm, from which the design capture volume is calculated, is defined as the 85th percentile, 24-hour rain event.
[10] DMA B1 is shown on the WQMP map. However, it is not required that the project treat the DCV generated from this area since it is an offsite area.

Figure 8 - Pre-Project Hydrology



RATIONAL METHOD RESULTS - AREA A

NODE TO NODE	Q_{100} (CFS)	T_C (MIN)	Q_{10} (CFS)	T_C (MIN)
101–102	6.06	17.32	3.77	17.32
102–102	7.68	17.32	4.77	17.32
102–103	12.41	18.16	7.68	18.25
103–106	15.96	20.05	9.83	20.33
103–106	16.36	20.05	10.09	20.33
101–104	2.79	16.50	1.74	16.50
104–105	5.86	17.65	3.64	17.80
105–106	10.68	23.07	6.52	23.57
*105–106	25.64	20.04	15.72	20.33

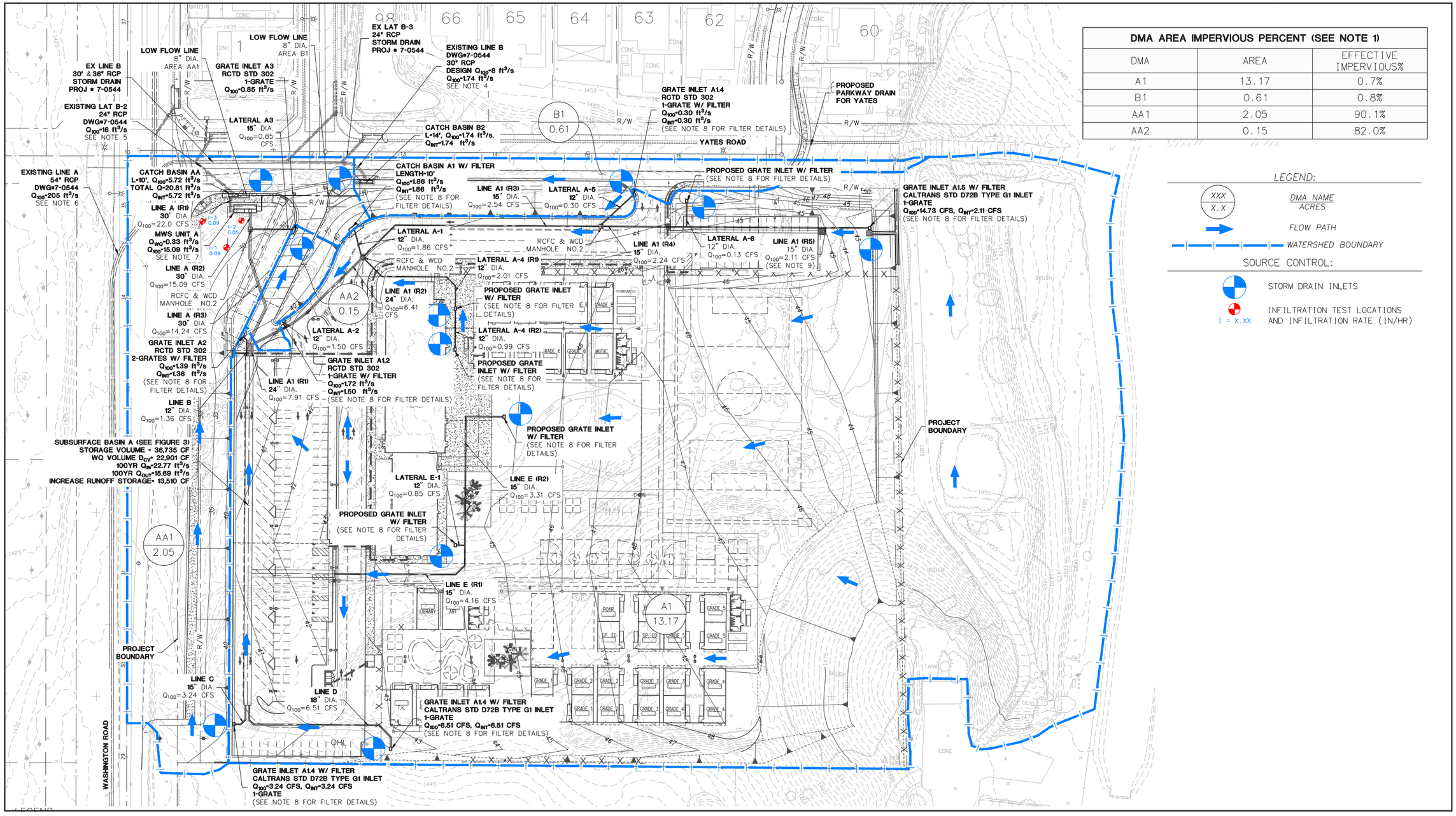
* DENOTES CONFLUENCE POINT

Source: JLC Engineering & Consulting, Inc., 2024.

3. Environmental Analysis

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Figure 9 - WQMP Site Plan



DMA AREA IMPERVIOUS PERCENT (SEE NOTE 1)

DMA	AREA	EFFECTIVE IMPERVIOUS%
A1	13.17	0.7%
B1	0.61	0.8%
AA1	2.05	90.1%
AA2	0.15	82.0%

0 100
Scale (Feet)

Source: Kirk Moeller Architects, Inc 2025.

3. Environmental Analysis

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The DMAs are described in detail in the preliminary WQMP. The onsite DMAs have the same Hydrologic Control BMP, which would be the subsurface basin with no infiltration and the MWS (JLC 2025a).

Additionally, the Project is not exempt from hydromodification[11] requirements since Benton Creek, which is a receiving water of the Project Site, is a natural channel. Therefore, the Project would be required to implement Hydrologic Control and Sediment Supply BMPs onsite to meet the hydrologic performance standards in the MS4 permit[12]. As demonstrated in the WQMP, the subsurface basin and MWS have been designed to ensure that hydrologic requirements per the MS4 have been met (Appendix H). Project development would also comply with the requirements of County Ordinance 754, Establishing Stormwater/Urban Runoff Management and Discharge Controls.

Based on the preceding, no significant water quality and waste-discharge impacts from project operation activities would occur and no mitigation measures are necessary.

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 Impact. The Eastern Municipal Water District (EMWD) would provide potable water to the Project Site. EMWD provides potable water, recycled water, and wastewater services to an area of approximately 555 square miles in western Riverside County. The service area includes seven incorporated cities in addition to unincorporated areas of Riverside County. Local supplies include recycled water, potable groundwater, and desalinated groundwater. EMWD produces potable groundwater from two management plan areas within the San Jacinto Groundwater Basin. The areas are the West San Jacinto Groundwater Sustainability Agency (GSA) Plan Area (West San Jacinto Basin) and the Hemet/San Jacinto Water Management Plan area (Hemet/San Jacinto Basin). EMWD also receives imported water from the Metropolitan Water District of Southern California (Metropolitan). About half of the water used in EMWD's service area is imported by Metropolitan.

EMWD projects that it would have sufficient water supplies for normal, single-dry, and multiple-dry years (EMWD 2021a). Additionally, the Hemet/San Jacinto is adjudicated,[13] and the West San Jacinto is managed by the West San Jacinto GSA through their San Jacinto Groundwater Sustainability Plan (GSP) (DWR 2022). The

[11] Hydromodification is the alteration of the natural state of rivers, streams, and creeks, including their beds, banks, and stream flows. It can result from development that increases the volume and velocity of runoff, such as converting open landscapes into roads, buildings, and parking lots.

[12] The Hydrologic Performance Standard consists of matching or reducing the flow duration curve of post-development conditions to that of pre-existing, naturally occurring conditions, for the range of geomorphically significant flows (the low flow threshold runoff event up to the 10-year runoff event). 10 percent of the 2-year runoff event can be used for the low flow threshold.

[13] When water users within a groundwater basin are in dispute over legal rights to the water, a court can issue a ruling known as an adjudication. The court decree will define the area of adjudication. The court typically appoints a watermaster to administer the court's decree. In basins or areas where a lawsuit is brought to adjudicate, the groundwater rights of all the overliers and appropriators are determined by the court.

GSP ensures the groundwater basin will be managed to reach long-term sustainability. Therefore, the Project's water demand would not decrease groundwater supplies.

Additionally, the geotechnical evaluation prepared for the Project Site noted that seepage was encountered in one on-site exploration trench (Appendix D) The seepage occurred at a depth of approximately 4.5 to 7 feet below existing grade. The San Diego Aqueduct is located adjacent to the eastern Project Site boundary and seepage may be encountered in cut slopes or excavations in this area. Based on the groundwater depths reported at a well located approximately one mile south of the Project Site groundwater is approximately 35 feet below existing grade. Therefore, any excavation required during Project construction would not have the potential to intersect groundwater nor require construction dewatering. Furthermore, the Project does not propose the use of any wells or other groundwater extraction activities. Therefore, the Project would not directly draw water from the groundwater table.

Finally, the Project Site is not in or near a groundwater recharge area/facility, nor does it represent a source of groundwater recharge. Therefore, the Project would not interfere with groundwater recharge.

Based on the preceding, the Project would not substantially interfere with groundwater supplies or recharge. Impacts to groundwater supplies would be less than significant and no mitigation measures are necessary.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in a substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Erosion and siltation impacts potentially resulting from alteration of the drainage pattern due to the Project would, for the most part, occur during the project's construction phase, which would include site preparation and grading activities. Environmental factors that affect erosion include topographic, soil, and wind and rainfall characteristics. Siltation is most often caused by soil erosion. Following is a discussion of the potential erosion and siltation impacts that could occur during the construction and operational phases of the Project.

Project Construction

As discussed above in Section 3.10.a, the project construction contractor would be required to prepare and implement a SWPPP pursuant to the CGP during grading and construction. The SWPPP would specify erosion- and sediment-control BMPs that the project construction contractor would implement prior to and during grading and construction to minimize erosion and siltation impacts on- and offsite. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap or filter sediment once it has been mobilized. BMPs that would be implemented during the Project's construction phase are discussed in detail in Section 3.10.a, above. For example, BMPs would include but are not limited to installation of perimeter silt fences; installation of silt fences around stockpile and covering of stockpiles; and stabilization of disturbed areas where construction ceases for a determined period of time (e.g., one

week) with erosion controls. Additionally, project construction activities would implement the requirements of the adopted CBC, County Ordinance No. 457.

Adherence to the BMPs in the SWPPP and requirements of the County Ordinance No. 484 would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. The construction-phase BMPs would also ensure effective control of not only sediment discharge, but also of pollutants associated with sediments (e.g., nutrients, heavy metals, and certain pesticides).

Therefore, Project-related construction activities would not result in substantial erosion or siltation on- or offsite. Construction-related impacts would be less than significant and no mitigation measures are necessary.

Project Operation

Under the Project, there would be some open space areas that could be vulnerable to erosion or siltation. However, these areas would be mulched and native vegetation would be planted to limit erosion. Under proposed conditions, stormwater runoff would also be conveyed similar to existing conditions, continuing to flow to the west.

Project development would not substantially alter the existing drainage pattern of the Project Site and would not alter the course of a stream or a river. The Project would be implemented in accordance with the WQMP and abide by the requirements of the MS4 permit.

Furthermore, Project development would be required to comply with the provisions of the County Ordinance No.754 which requires development projects to implement BMPs including but not limited to BMP's specified in the California Stormwater Best Management Practice Handbooks for Municipal, Industrial/Commercial and Construction Activity and those measures identified by the Director of the County Transportation and Land Management Agency, on individual sites to reduce pollutants in the stormwater.

Therefore, development of the Project would not substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on- or offsite. Operation-related impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. As shown in Figure 3, *Aerial Photograph*, the Project Site consists of vacant pre-disturbed land. Under existing conditions, the Project Site has zero percent impervious surface area. The existing terrain currently slopes from east to west and existing runoff flows into the adjacent streets and eventually surface flows into the existing Washington Street right-of way (JLC 2025b).

Under proposed conditions and upon Project completion, the portion of the Project Site would be developed with impervious (e.g., buildings, asphalt parking, hardcourts) and pervious (e.g., playfield, open lawn areas) surfaces.

Site runoff from the Project Site would be conveyed similar to existing conditions, continuing to flow westerly via a comprehensive onsite drainage collection, conveyance, and treatment system. Currently there are existing lines and laterals with a flow rate for the 100-year storm frequency of 8 cubic feet per second (cfs) for Line B and a flow rate of 16 cfs for the Lateral B2, which is a total of 24 cfs (JLC 2025B). As shown in Figure 10, *Proposed Hydrology Map*, the DMAs and their respective systems are described below:

- DMA AA consists of two drainage areas AA1 and AA2. Area AA1 represents a driveway area that is within the Project Site boundary. Area AA2 represents the proposed improvements along Washington Street and Yates Road. The total flow rate for the 100-year storm event from Area AA1 is 0.52 cfs and Area AA 2 is 5.7 cfs for a total of 6.2 cfs.
- DMA B accounts for a 3.36-acre offsite area that would flow into Yates Road. Yates Road will convey flows towards Washington Street. A 28-foot catch basin is proposed at the upstream limits of Line B to intercept the flows east of Line B and the charter school driveway entrance. The total flow rate from Area B is 8.5 cfs for the 100-year storm event.
- DMA A consists of three drainage areas defined as Area A1, A2, and A3. All runoff from DMA A would be collected and attenuated in the proposed subsurface basin. Runoff from DMA B and AA would not be mitigated. Since the total runoff from DMAs B and AA is 14.7 cfs, the runoff for the 100-year storm event for DMA A should not exceed 9.3 cfs since the pre-development flow to the existing lines total 24 cfs. As shown in the Hydrology and Hydraulic Study (see Appendix J) the subsurface storage basin is sized so that the 100-year storm event flow out of the system is 7.4 cfs.

Based on the preceding, post development runoff would be adequately handled by the Project's drainage system and would not result in flooding on- or offsite. Therefore, impacts would be less than significant and no mitigation measures are necessary

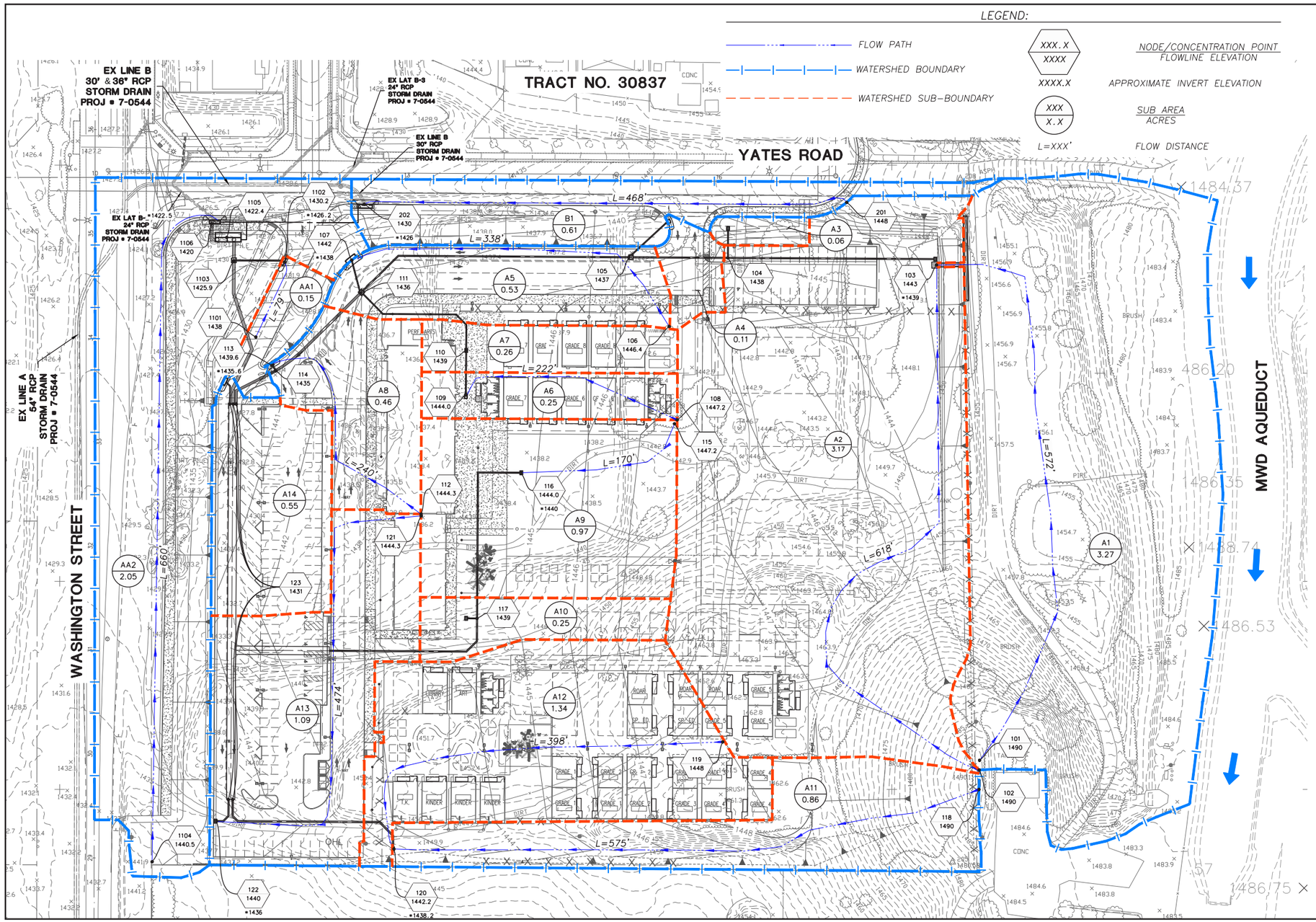
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. An increase in impervious surfaces with Project development could result in increases in stormwater runoff, which in turn could exceed the capacity of the existing or planned storm drain systems. As shown in Section 3.10.c.ii, the subsurface storage system would attenuate the 100-year storm event runoff flow to below pre-development flows. Therefore, the Project would not increase the rate or amount of stormwater runoff in a manner that would exceed the capacity of existing or planned storm drain facilities. Impacts would be less than significant and no mitigation measures are necessary.

iv) Impede or redirect flood flows?

No Impact. The Project Site is not in a Federal Emergency Management Agency (FEMA) 100-year flood hazard zone, or a Department of Water Resources (DWR) flood zone. However, the northwest corner of the site is within a Riverside County Flood Control (RCFC) flood zone (RCFC 2022). The proposed stormwater facility would be located in this corner of the Project Site. Since no buildings are proposed in the RCFC flood zone area, the Project would not impede or redirect flood flows. The Project Site is also not within a dam inundation area (DWR 2021). Therefore, no impact to flood flows is expected to occur and no mitigation measures are necessary.

Figure 10 - Proposed Hydrology Plan



RATIONAL METHOD RESULTS - AREA A				
NODE TO NODE	Q_{100} (CFS)	T_C (MIN)	Q_{10} (CFS)	T_C (MIN)
101–103	7.76	11.97	4.85	11.97
102–103	8.03	10.33	5.00	10.33
*102–103	14.73	10.33	9.19	10.33
103–104	14.73	10.89	9.19	10.96
104–104	14.86	10.89	9.27	10.96
104–105	14.86	11.10	9.27	11.19
105–105	15.16	11.10	9.47	11.19
105–111	15.16	11.97	9.47	12.19
106–107	1.86	6.96	1.22	6.60
107–111	1.86	7.02	1.22	7.03
108–109	0.99	5.61	0.65	5.61
109–110	0.99	5.74	0.65	5.75
110–110	2.01	5.74	1.32	5.75
110–111	2.01	6.10	1.32	6.15
*110–111	17.94	11.97	11.27	12.19
111–114	17.94	12.21	11.27	12.46
112–113	1.72	6.08	1.12	6.08
113–114	1.72	6.09	1.12	6.09
*113–114	19.11	12.21	12.03	12.46
114–123	19.11	12.26	12.03	12.52
115–116	3.31	6.69	2.12	6.69
116–117	3.31	7.41	2.12	7.50
117–117	4.16	7.41	2.67	7.50
117–123	4.16	7.83	2.67	7.98
118–120	2.42	9.19	1.53	9.19
119–120	4.58	7.33	3.00	7.33
*119–120	6.51	7.33	4.22	7.33
120–123	6.51	7.48	4.22	7.50
121–122	3.24	9.23	2.11	9.23
122–123	3.24	9.23	2.11	9.23
*122–123	30.09	12.26	19.08	12.26
123–123	31.48	12.26	19.98	12.26

* DENOTES CONFLUENCE POINT

RATIONAL METHOD RESULTS - AREA AA				
NODE TO NODE	Q_{100} (CFS)	T_C (MIN)	Q_{10} (CFS)	T_C (MIN)
1101–1102	0.60	5.00	0.39	5.00
1102–1103	0.60	5.26	0.39	5.30
123–123	31.48	12.26	31.48	12.26
123–1103	31.48	12.42	31.48	12.42
*123–1103	31.86	12.42	31.72	12.42
1103–1105	31.86	12.43	31.72	12.43
1105–1106	31.86	12.45	31.72	12.45
1104–1106	5.72	9.63	3.67	9.63
*1104–1106	36.82	12.45	34.91	12.45

* DENOTES CONFLUENCE POINT

RATIONAL METHOD RESULTS - AREA B				
NODE TO NODE	Q_{100} (CFS)	T_C (MIN)	Q_{10} (CFS)	T_C (MIN)
201–202	1.74	8.98	1.10	8.98

Source: JLC Engineering & Consulting, Inc 2025.

3. Environmental Analysis

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

Less Than Significant Impact. As noted above in Section 3.10.c.iv, the Project Site is not in a FEMA 100-year flood hazard zone or a DWR flood zone. The northwest corner of the site is within a RCFC flood zone; however, the proposed stormwater facility would be provided in this corner (RCFC 2022). The stormwater facility would not release pollutants if inundated. The Project Site is also not within a dam inundation area (DWR 2021).

A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. The Skinner Reservoir is approximately 0.6 miles southeast of the Project Site and would not pose a flood hazard to the site due to a seiche.

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The Project Site is approximately 30 miles inland from the Pacific Ocean. Therefore, the site is outside the tsunami hazard zone and would not be affected by a tsunami.

Based on the preceding reasons, the Project would not risk release pollutants as the result of floods, tsunami, or seiche. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Water quality at the Project Site is regulated by the San Diego RWQCB's Water Quality Control Plan for the San Diego Basin (Basin Plan). The basin plan contains water quality standards and identifies beneficial uses (wildlife habitat, agricultural supply, fishing, etc.) for receiving waters along with water quality criteria and standards necessary to support these uses consistent with federal and state water quality laws. As discussed in Section 3.10.a, above, the Project would not violate any water quality standards and will therefore not obstruct implementation of the Basin Plan. Therefore, no impact would occur and no mitigation measures are necessary.

Additionally, the Project Site does not overlie a groundwater basin; however, EMWD, which is the water provider for the Project Site, has groundwater wells in Hemet/San Jacinto subbasin and the West San Jacinto subbasin. The Hemet/San Jacinto is adjudicated, and the West San Jacinto is managed by the West San Jacinto GSA through their San Jacinto GSP (DWR 2022). As discussed above in Sections 3.10.a and b, the Project would not violate any groundwater water quality standards and will not decrease groundwater supplies or interfere substantially with groundwater recharge. Therefore, no impact would occur and no mitigation measures are necessary.

3.11 LAND USE AND PLANNING

Would the project:

f) Physically divide an established community?

No Impact. The Project involves development of a new charter school on an undeveloped site (see Figures 3, *Aerial Photograph*, and 4, *Conceptual Site Plan*. The Project would not introduce a physical barrier that would separate land uses that are not already separated. Connections between residential uses surrounding the Project Site would remain and not be impeded or impacted in any way. Except for new driveways accessing the northern portion of the Project Site, which is formed by Yates Road, the Project would not physically change or disrupt the surrounding neighborhood's street patterns or otherwise impede movement through the neighborhoods.

Additionally, while there is established residential surrounding the Project Site, Project development would not physically divide these communities in any way because the Project would be developed within the confines of the Project Site and would not introduce roadways or other infrastructure improvements that would bisect or transect the residential communities. Furthermore, the Project would not introduce a new land use that would disrupt existing land use patterns. The Project's proposed charter school use is compatible with, and would be used by, the uses surrounding the Project Site.

Therefore, no impact would occur and no mitigation measures are necessary.

g) 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?

No Impact. The planning and regulatory plans that govern development and use of the Project Site are the Riverside County Ordinance (County Ordinance No. 348). The development and design standards and regulations contained in the Riverside County Land Use Ordinance, which implements the Riverside County General Plan, constitute the zoning regulations that govern development of the Project Site. Following is an analysis of the Project's consistency with these adopted land use regulations.

General Plan Consistency

The Project Site has a General Plan land use designation of Medium Density Residential (MDR). Development and operation of the new charter school on the Project Site would not conflict with this designation as the prosed educational use is a compatible and permitted use under the MDR designation.

As shown on Figure 3, *Aerial Photograph*, the Project Site is in an urbanizing area of the County and is surrounded by a mix of residential uses and vacant land. The Project would not represent a change in land use patterns or an inconsistency with adopted land use plans. Furthermore, Project development does not include or require any amendments to the Riverside County General Plan.

Therefore, Project implementation would not conflict with the Riverside County General Plan. No land use impact related to general plan consistency would occur and no mitigation measures are necessary.

Land Use Ordinance Consistency

The Project Site is zoned R-1 (One-Family Dwelling Zone). Schools are permitted in this zoning district through County approval and issuance of a Public Use Permit (CUP). The purpose and intent of the PUP is to provide for the accommodation of land uses with special site or design requirements, operating characteristics, or potential adverse effects on surroundings, through review and the imposition of conditions of approval.

Through the County's development review process—which includes Riverside County Planning Commission review and consideration of the PUP—the County would ensure that approval of the PUP would not conflict with any applicable land use plan, policies, or regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect. In determining the appropriateness of the Project's PUP, the Riverside County Planning Commission would review the PUP's conformance with the objectives and requirements of the Riverside County Land Use Ordinance; consistency with the Riverside County General Plan and any potential effect to the public health, safety and welfare, and traffic effects; and general compliance with the Riverside County Land Use Ordinance standards.

Additionally, Project development would not require the approval of a zone change; nor would it require a variance or any adjustments from the Riverside County Land Use Ordinance standards, which help ensure that development projects are designed and implemented in a manner that is not detrimental to the Project Site or its surroundings. The Project has been designed and would be developed in accordance with all applicable development and design standards of the Riverside County Land Use Ordinance, including those related to building height and setbacks, walls and screening, building and site plan design, landscaping, and parking. Compliance with the applicable development and design standards would be ensured through the County's development review process.

Therefore, Project implementation would not conflict with the Riverside County Land Use Ordinance. No land use impact related to the land use ordinance consistency would occur and no mitigation measures are necessary.

3.12 MINERAL RESOURCES

Would the project:

a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

No Impact. Mineral resources are naturally occurring deposits such as sand, gravel, and stone, which are used in the production of materials such as the manufacturing of concrete.

According to the Multipurpose Open Space Element of the Riverside County General Plan, the county has extensive deposits of clay, limestone, iron, sand, and aggregates. The Project Site occurs in Mineral Resource Zone 3 (MRZ-3), which are areas where the available geologic information indicates that mineral deposits are likely to exist; however, the significance of the deposit is undetermined (County of Riverside 2015). Also, the Project Site consists of vacant land (see Figure 3, *Aerial Photograph*) and is not used and has never been used for

or supported mining or mineral extraction operations. No locally important mineral resource recovery sites are on or near the Project Site. Mining on the Project Site would also be incompatible with the surrounding uses, which consists of residential and institutional uses. Mining is also not a permitted use under the County's General Plan land use or zoning designations of the Project Site.

Furthermore, no mining sites are designated in the Riverside County General Plan, and the nearest mine to the Project Site mapped on the Mines Online website is over 4.6 miles away (DMR 2023). Finally, a review of the California Geologic Energy Management Division's Well Finder indicates that there are no oil or energy wells located on or within proximity of the Project Site (CalGEM 2023).

Based on the preceding, no impact to mineral resources or mineral resource recovery sites would occur and no mitigation measures are necessary.

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?

No Impact. See response to Section 3.12.a, above. As substantiated in this section, no impact would occur and no mitigation measures are necessary.

3.13 NOISE

Noise is defined as sounds that are loud, unpleasant, unexpected, or otherwise undesirable. Excessive noise is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the State of California and Riverside County have established criteria to protect public health and safety and to prevent the disruption of certain human activities.

Fundamentals of noise and vibration, and project-specific technical information (including existing local regulations, construction noise modeling, and calculation worksheets for traffic noise) can be found in Appendix K of this Initial Study.

Existing Noise Environment

The Project Site is in the community of French Valley, an unincorporated area of Riverside County. The dominant noise source in the project area is traffic on Washington Street and other local roadways. To establish existing conditions, traffic noise modeling was conducted using a version of the Federal Highway Administration Traffic Noise Prediction Model (FHA-77-108). The FHA model uses average daily traffic volumes (ADT), vehicle mix, day, evening, and night percentage splits, vehicle speeds and number of travel lanes. Traffic data inputs used in the model were obtained from the Riverside County General Plan Noise Element Noise Appendix I (included in Appendix K of this Initial Study) and from EPD Solutions (traffic engineer). Table 10 shows the modeled existing CNEL at 50 feet and the distance to the 60, 65, and 70+ dBA CNEL contour. The Project Site is along Washington Street, north of Shrimp Lane, where the modeled existing noise level is 70.2 dBA CNEL at 50 feet from the nearest travel lane centerline. The distance to the 60, 65, and 70+ CNEL contours are 240, 112, and 52 feet, respectively.

Table 10 Existing Traffic Noise Conditions

Roadway Segment	Existing ADT	CNEL (dBA) at 50 feet	Distance to CNEL Contour (feet)		
			70 dBA	65 dBA	60 dBA
Abelia Street between running Stream and Geranium Place	2,322	59.2	10	21	44
Abelia Street west of Temecula Valley Charter School Driveway	2,416	59.3	10	21	45
Washington Street north of Abelia Street	9,090	69.4	46	99	212
Washington Street north of Shrimp Lane	10,929	70.2	52	112	240
Washington Street south of Shrimp Lane	11,108	70.3	52	113	243

Source: EPD Solutions 2024. Riverside County General Plan Appendix J.

Certain land uses are particularly sensitive to noise and vibration. These uses include residences, schools, hospital facilities, houses of worship, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. The Project Site is bounded by existing single-family homes to the north, across Yates Road; a single-family residence on a large property to the south; vacant land and a flood control channel to the east; and vacant land to the west.

Applicable Standards

State Noise Regulations

Title 5, Section 14040(q) California Department of Education

Under Title 5, the California Department of Education (CDE) regulations require the school district to consider noise in the site selection process. As recommended by CDE guidance, if a school district is considering a potential school site near a freeway or other source of noise, it should hire an acoustical engineer to determine the level of sound that the site is exposed to and to assist in designing the school should that site be chosen.

CALGreen

The California Green Building Standards Code (CALGreen) has requirements for insulation that affect exterior-interior noise transmission for non-residential structures. Pursuant to CALGreen Section 5.507.4, Acoustical Control, within a 65 dBA CNEL or L_{dn} noise contour of an airport, freeway or expressway, railroad, industrial source or fixed-guideway source, a project must use either the prescriptive or performance method to ensure acceptable interior exposure. Under the prescriptive method, wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall meet a composite sound transmission class (STC) rating of at least 50 or a composite outdoor-indoor transmission class (OITC) rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30. Where noise contours are not readily available, buildings exposed to a noise level of 65 dBA L_{eq} during any hour of operation shall have building, addition or alteration exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum of STC 40 (or OITC 30). Under the performance method, wall and roof-ceiling assemblies shall be constructed to provide an interior noise environment that does not exceed an hourly L_{eq} of 50 dBA.

3. Environmental Analysis

Riverside county Noise Regulations

The Noise Element of the Riverside County General Plan indicates that new school uses are "Normally Acceptable" in exterior noise environments of 70 dBA CNEL or less and "Conditionally Acceptable" in noise environments between 60 dBA and 70 dBA CNEL. For new school buildings within a "Conditionally Acceptable" criteria, new construction should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design. It is noted that conventional construction, with closed windows and fresh air supply systems or air conditioning will normally suffice as adequate exterior to interior noise insulation.

The Project Site is within the census-designated area of French Valley, an unincorporated community of Riverside County. Therefore, the county's noise standards are applicable to the Project. The County regulates and enforces noise standards through County Ordinance No. 847, which are outlined in Table 11. The County restricts exterior noise levels generated at a property from exceeding established limits during daytime and nighttime hours.

Table 11 Riverside County Exterior Noise Standards

General Plan Foundation Component	General Plan Land Use Designation	Maximum Decibel Level (dBA Lmax)	
		7:00 AM – 10:00 PM	10:00 PM – 7:00 AM
Community Development	Residential [1]	55	45
	Commercial [2]	65	55
	Light Industrial	75	55
	Heavy Industrial	75	75
	Business Park	65	45
	Public Facility	65	45
	Specific plan Residential	55	45
	Specific Plan Commercial	65	55
	Specific Plan Light Industrial	75	55
	Specific Plan Heavy Industrial	75	75
Rural Community	Estate Density Residential	55	45
	Very Low Density Residential		
	Low Density Residential		
Rural	Rural Residential	45	45
	Rural Mountainous		
	Rural Desert		
Agriculture	Agriculture	45	45
Open Space	Conservation	45	45
	Conservation Habitat		
	Recreation		
	Rural		
	Watershed		
	Mineral Resources	75	45

Source: Riverside County Ordinance No. 847
1. Estate Density Residential, Very Low Density Residential, Low Density Residential, Medium Density Residential, Medium High Density Residential, High Density Residential, Very High Density Residential, Highest Density Residential.
2. Retail Commercial, Office Commercial, Tourist Commercial, Community Center.

The County's Noise Ordinance (Ordinance No. 847) exempts the following from the exterior noise standards:

- Public or private schools and school-sponsored activities;
- Private construction projects located within one-quarter 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.
- Property maintenance, including, but not limited to, the operation of lawnmowers, leaf blowers, etc., provided such maintenance occurs between the hours of 7:00 AM and 8:00 PM.; and
- Heating and air conditioning equipment.

Federal Transit Administration Criteria

The County's Ordinances does not establish construction noise standards. Therefore, for the purposes of this analysis, the Federal Transit Administration (FTA) criterion of 80 dBA L_{eq} for residential receptors is used to assess construction noise impacts (FTA 2018). Riverside County also does not establish vibration standards. Therefore, for the purposes of this analysis, the FTA criterion of 0.2 peak particle velocity (PPV) in inches per second (in/sec) is used to assess vibration impacts at non-engineered structures (e.g., wood-frame residential) (FTA 2018).

Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. Following is a discussion of the temporary and permanent noise impacts as a result of the Project's construction and operational phases.

Construction Noise

Construction would be broken into three discrete phases: clearing, grading, and construction. Overall construction is estimated to take approximately nine months, commencing in Fall 2025. Construction equipment for the Project would include graders, tractors, loaders, backhoes, forklifts, compactors, dozers, and trucks.

Two types of short-term noise impacts could occur during construction: (1) mobile-source noise from transport of workers, material deliveries, and debris and soil haul and (2) stationary-source noise from use of construction equipment.

3. Environmental Analysis

Construction Vehicles

The transport of workers and materials to and from the construction site would incrementally increase noise levels along site access roadways. Individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA L_{max} at 50 feet from worker and vendor vehicles and haul trucks.

Worker and vendor trips would total a maximum of 90 daily trips during the overlapping activity phases of onsite utility trenching, building construction, paving, and modular building installation. A maximum of 40 haul truck trips would occur over 5 workdays during overlapping onsite building construction, finishing and landscaping, and offsite asphalt demolition phases. Current site access is via Washington Street. Existing ADT volumes along Washington Street are summarized in Table 10, *Existing Traffic Noise Conditions*, which shows that existing ADT volumes range from 9,090 to 11,108. The temporary construction-related noise increase is estimated by logarithmically comparing the construction trips to existing daily traffic.[14] The addition of worker, vendor and haul truck trips to existing volumes would result in a temporary noise increase of 0.1 dBA CNEL or less. An increase of 0.1 dBA would not be perceptible and, therefore, would result in a less than significant increase. Additionally, construction trips would occur during the daytime hours and not in the nighttime sensitive hours. Therefore, construction trip noise impacts would be less than and no mitigation measures are necessary.

Construction Equipment

Noise generated by onsite construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each stage of construction involves different kinds of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

The noise produced at each construction stage is determined by combining the L_{eq} contributions from each piece of equipment used at a given time, while accounting for the ongoing time-variations of noise emissions. Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on the specific activity performed at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and shielding effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements.

[14] Traffic Noise Increase = 10*Log(9,220/9,090) = 0.1 dBA CNEL.

On-site Construction Noise

Average noise levels from project-related construction activities are calculated by modeling the three loudest pieces of equipment per activity phase. Equipment for grading and site preparation is modeled at spatially averaged distances (i.e., from the acoustical center of the general construction site to the property line of the nearest receptors) because the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors for mobile equipment. Similarly, construction noise from paving activities is modeled from the center of proposed parking areas. Construction equipment for building construction and architectural coating is modeled from the edge of the proposed building to the nearest sensitive receptors. Lastly utility trenching and landscaping finishing typically occurs along the edge of projects. Therefore, it is assumed that it could occur within 50 feet of the edge of the Project Site.

The Project's expected construction equipment mix was categorized by construction activity using the FHA Roadway Construction Noise Model (RCNM) (FHA 2006). The associated, aggregate sound levels—grouped by construction activity—are summarized in Table 12. RCNM modeling input and output worksheets are included in Appendix K.

As shown in Table 12, on-site construction-related noise levels would not exceed the 80 dBA L_{eq} threshold at the nearest sensitive receptors. On-site construction activities improvements would not expose surrounding sensitive receptors to prolonged periods of construction noise. Additionally, all construction activities would be required to comply with Riverside County Noise Ordinance Ordinances No. 84, including the limits of construction hours. Therefore, construction-equipment noise impacts would be considered less than significant and no mitigation measures are necessary.

Table 12 Project-Related Construction Noise, dBA Leq

Construction Activity Phase	RCNM Reference Noise Level	Nearest Off-site Receptors	
		Residences to the North	Residences to the South
Distance in feet	50	370	530
Site Preparation	83	65	62
Rough Grading	83	65	62
Fine Grading	82	65	62
Distance in feet	50	250	180
Building Construction	78	64	66
Modular Installation	78	64	67
Architectural Coating	78	64	66
Distance in feet	50	150	400
Paving	78	68	60
Distance in feet	50	100	140
Utility Trenching	81	75	72
Finish and Landscaping	81	75	72
Maximum dBA L_{eq}		75	72
Exceeds 80 dBA L_{eq} Threshold?		No	No

Notes: Calculations performed with the FHA RCNM software are included in Appendix K.

Off-site Roadway Improvements Construction Noise

Off-site improvements include constructing the roadway to its ultimate right-of-way width along the portion of Yates Road, which abuts the northern boundary of the Project Site, and Washington Street, which abuts the western boundary of the Project Site. The improvements include roadway pavement for the addition of curbs and gutters, curb ramps, driveways, and sidewalks.

These roadway improvements would require construction equipment including but not limited to tractors, pavers, graders, rollers, dozers, scrapers, loaders, generators, compactors, and manlifts. Construction activities from roadway improvements would not expose surrounding sensitive receptors to prolonged periods of construction noise. Construction equipment could reach up to 83 dBA at a distance of 50 feet construction due to proposed off-site improvements. However, the nearest receptor property line is approximately 100 feet to the north. At 100 feet, construction noise levels would attenuate to 77 dBA. Additionally, roadway improvement work would progress in a linear fashion, generating less noise at each receptor each day and off-site roadway improvements are anticipated to be completed over a short 30 work-day period and would not occur during nighttime hours. Therefore, construction noise levels from proposed roadway improvements would not expose receptors to excessive construction noise. Impacts would be less than significant and no mitigation measures are necessary.

Operational Noise

Mobile Noise

A project will normally have a significant effect on the environment related to noise if it substantially increases the ambient noise levels for adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA are detectable under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an exterior environment. Based on this, the following thresholds of significance, similar to those recommended by the Federal Aviation Administration, are used to assess traffic noise impacts at sensitive receptor locations. A significant impact would occur if traffic noise increases would exceed:

- 1.5 dBA or more for ambient noise environments of 65 dBA CNEL and higher.
- 3 dBA or more for ambient noise environments between 60 and <65 CNEL.
- 5 dBA or more for ambient noise environments of less than 60 dBA CNEL.

The analysis in this section compares the existing plus project traffic volumes to the existing traffic volumes logarithmically to estimate the increase due to development of the Project. The same method is used in determining the cumulative traffic noise level increase (future plus project traffic over existing no project traffic). As shown in Table 13, project-related traffic noise would result in a traffic noise increase of 0.5 dBA CNEL. Cumulative traffic noise would result in an increase of 0.6 dBA CNEL. Therefore, both Project and cumulative traffic noise impacts would be less than significant and no mitigation measures are necessary.

Table 13 Project-Related Traffic Noise Increase

Roadway Segment	ADT Volumes				dBA CNEL Increase		
	Existing	Existing Plus Project	Future No Project	Future Plus Project	Project Noise Increase	Cumulative Noise Increase	Project's Cumulative Contribution
Abelia Street between running Stream and Geranium Street	2,322	2,572	2,415	2,665	0.4	0.6	0.4
Abelia Street west of Temecula Valley Charter School Driveway	2,416	2,666	2,513	2,763	0.5	0.6	0.4
Washington Street north of Abelia Street	9,090	9,590	9,454	9,954	0.2	0.4	0.2
Washington Street north of Shrimp Lane	10,929	12,095	11,366	12,532	0.4	0.6	0.4
Washington Street south of Shrimp Lane	11,108	12,274	11,552	12,718	0.4	0.6	0.4

Source: EPD Solutions 2024.

Stationary Noise

Mechanical Equipment Noise

The proposed school would include new mechanical equipment for heating, ventilation, and cooling equipment (HVAC). The nearest sensitive receptor to the new building that would have HVAC equipment (T.K Building) is approximately 180 feet to the south. Typical HVAC equipment generates noise levels ranging up to 72 dBA at distance of 3 feet. At 180 feet, HVAC related noise would attenuate to 36 dBA or less. This would be below the daytime and nighttime County noise standards of 55 dB L_{max} and 45 dB L_{max}, respectively. In addition, HVAC noise is exempt from the noise standards under County Ordinance 847, Section 2 (I), *Exemptions*. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Student Recreational Noise

As shown on Figure 4, *Conceptual Site Plan*, the Project includes several playfields and sports courts, which include an outdoor turf soccer field, a second general turf area, and hardcourts. The Project would include an outdoor turf soccer field, a second general turf area, and hardcourts. The playfields and sports courts would not be lighted, and use of them would be limited to daylight hours during the week. Also, playfields would not have amplified sound. The nearest recreational area to sensitive receptors (single-family to the north) is the proposed soccer field at approximately 250 feet. Based on on-site noise measurements conducted by PlaceWorks staff taken for similar school projects, typical noise levels associated with outdoor recess and soccer games range between 49 and 70 dBA at 50 feet. At 250 feet, noise levels would attenuate to 46 dBA or less. Considering that the sensitive receptors to the north have an approximately 6-foot masonry walls, noise levels would be further attenuated below the daytime and nighttime County noise standards of 55 dB L_{max} and 45 dB L_{max}, respectively. In addition, County Ordinance 847, Section 2 (I), Regulating Noise - Exemptions, sound emanating from public or private schools are exempt from the provisions of County Ordinance 847, Noise Regulation. Therefore, impacts would be less than significant impact and no mitigation measures are necessary.

Noise and Land Use Compatibility

The Noise Element of the Riverside County General Plan indicates that new school uses are "Normally Acceptable" in noise environments of up to 70 dBA CNEL for exterior uses and "Conditionally Acceptable" in noise environments between 60 dBA and 70 dBA CNEL. As discussed above and shown in Table 1, traffic noise modeling indicates that existing ambient noise levels along Washington Street, north of Shrimp Lane, are 69 dBA CNEL at 50 feet from the nearest travel lane centerline. Based on available site plans, the nearest proposed student building is approximately 250 feet east of Washington Street. At that distance, the nearest building would be just outside the 60 dBA CNEL traffic noise contour (see Table 10). Therefore, the proposed school would be within the "Normally Acceptable" noise and land use category of the Riverside County General Plan. Impacts would be less than significant and no mitigation would be necessary.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Following is a discussion of the Project's temporary and permanent noise vibration impacts as a result of the project's construction and operational phases.

Operational Vibration

Operation of the Project would not include any substantial long-term vibration sources. No significant vibration effects from operations sources would occur. Therefore, no impact would occur and no mitigation measures are necessary.

Construction Vibration

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reach levels that can damage structures.

For reference, a vibration level of 0.2 inches per second (in/sec) peak particle velocity (PPV) is used as the limit for non-engineered timber and masonry buildings, which would apply to the surrounding residential structures (FTA 2018). To determine potential vibration-induced architectural damage, the distance from the vibration source (construction equipment) to the vibration-sensitive receptors (residences) is measured from the edge of the construction site to the nearest building façade. Vibration-induced architectural damage is assessed in terms of peak velocity (PPV). Table 14 summarizes vibration levels for typical construction equipment at the nearest sensitive receptors.

Table 14 Vibration Levels for Typical Construction Equipment

Equipment	FTA Reference PPV (in/sec) at 25 feet	Single-family residence to the North 80 feet	Single-family residence to the South 180	Water tank and shed to the East 15
Vibratory Roller	0.21	0.037	0.011	NA
Clam shovel	0.202	0.035	0.010	NA
Hoe Ram	0.089	0.016	0.005	0.191
Large Bulldozer	0.089	0.016	0.005	0.191
Caisson Drilling	0.089	0.016	0.005	0.191
Loaded Trucks	0.079	0.013	0.004	0.164
Jackhammer	0.035	0.006	0.002	0.075
Small Bulldozer	0.003	0.001	0.000	0.006

Source: FTA 2018.

As shown in Table 14, typical construction equipment can generate vibration levels ranging up to 0.21 in/sec at 25 feet. Vibration levels at a distance greater than 25 feet would generate less than the 0.2 in/sec PPV. The nearest residential structures to the Project Site boundary are single-family homes to the north at approximately 80 feet. As shown in Table 14, vibration levels would be up to 0.037 in/sec PPV, which would not exceed the 0.20 in/sec PPV FTA criteria. The nearest non-residential structure is a water tank and shed approximately 15 feet east of the eastern Project Site boundary. Because no paving is proposed with 25 feet of this structure, at 15 feet, vibration levels would be up to 0.191 in/sec PPV. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

No Impact. The nearest airport to the Project Site is the French Valley Airport, located approximately 2.8 miles to the southwest (AirNav.com 2024). The Project Site is located well outside the 55 dBA CNEL noise contour of the French Valley Airport (Coffman Associates, Inc. 2009). The Project would not result in exposure of people working in the project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are necessary.

3.14 POPULATION AND HOUSING

Would the project:

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

No Impact. The Project does not include the development of uses such as new homes or businesses, which result in a direct or indirect growth in population. As shown on Figure 4, *Conceptual Site Plan*, the Project involves

the development of a new charter school campus. Institutional uses such as schools are generally developed in response to population growth in an area and do not cause population growth. The relocation of the charter school, which currently operates from 35755 to 35777 Abelia Street in Riverside County, approximately 800 feet to the northwest (see Figure 3, *Aerial Photograph*), would continue to serve students already living in the surrounding communities.

As discussed in Section 3.10, *Hydrology and Water Quality*, the Project would also make the necessary infrastructure connections to the existing water and sewer main in Yates Road to support operation of the new school campus. Additionally, fire hydrants would be installed onsite pursuant to requirements of the Riverside County Fire Department to ensure adequate fire protection infrastructure. Overall, the infrastructure improvements would be designed and constructed in accordance with County and fire department requirements and service providers requirements. Therefore, no impact would occur and no mitigation measures are necessary.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. As shown on Figure 3, *Aerial Photograph*, the Project Site consists of vacant land and no housing exists onsite. Therefore, Project development would not displace housing or people. No impact would occur and no mitigation measures are necessary.

3.15 PUBLIC SERVICES

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

c) Fire protection?

Less Than Significant Impact. The Riverside County Fire Department (RCFD) currently provides fire protection and emergency medical services to the Project Site and surrounding area via Battalion 15. RCFD services also include fire suppression, emergency medical, rescue, and fire prevention, and hazardous materials coordination services. There are 101 fire stations throughout Riverside County and nine fire stations in Battalion 15. The nearest fire stations to the Project Site are Station 83 at 37500 Sky Canyon Drive, approximately 4.4 miles to the southwest, and Station 95 at 32131 South Loop Ranch, approximately 6.1 miles south of the Project Site. Station 83 serves the French Valley Area of Temecula and is equipped with one medic engine and one water tender. Station 95 serves the Roripaugh Ranch area of Temecula and is equipped with one medic engine and utility vehicle (RCFD 2024). RCFD also has mutual aid agreements with other nearby fire departments.

Project implementation could result in a slight increase in calls for fire protection and emergency medical service in the event that a fire or other emergency event occurs onsite. However, considering the existing firefighting resources available in and near the service area covered by Battalion 15, Project impacts on fire protection and emergency services are not expected to occur. Additionally, in the event of an emergency at the Project Site

that required more resources than Fire Stations 83 and 95 could provide, RCFD would direct resources to the site from other stations nearby and, if needed, would request assistance from other nearby fire departments through their mutual aid agreements.

Project implementation is also not anticipated to impeded or increase RCFD's response times to either the Project Site or the surrounding vicinity. Based on a review of Google Earth, travel time to the Project Site from Station 83 is approximately 10 minutes and from Station 95 is approximately 12 minutes. Additionally, the Project Site is an infill site already served by RCFD; therefore, the Project would not result in an expansion of RCFD's service area.

The County also involves RCFD in the development review process in order to ensure that the necessary fire prevention and emergency response features are incorporated into development projects. The Project would incorporate such design features to minimize the potential demand placed on RCFD. For example, the proposed building would be of concrete construction. Concrete is non-flammable and concrete buildings have a lower fire hazard risk than typical wood-frame construction. The new school would also feature monitored fire sprinkler and alarm systems. Fire hydrants would also be installed throughout the school (near the northeastern, northwestern, and southwestern areas of the driveway and one within the campus near the sport courts), as required by RCFD. The fire hydrants would connect to the new onsite water lines with fire sufficient flows supplied by Eastern Municipal Water District. Additionally, the adequacy of existing water pressure and water availability in the project area would be verified by RCFD during the Project's plan check review process. Knox Boxes (or other approved means of emergency access to the site) would also be placed where necessary (i.e., security gates) to provide access for emergency personnel. Further, emergency access to the Project Site would be via the two driveways proposed along Yates Road, which connect to internal drive aisles. The drive aisles would serve as fire access lanes and become part of the onsite fire access loop (see Figure 4, *Conceptual Site Plan*). All site and building improvements proposed as a part of the project would be subject to review and approval by the County and RCFD prior to issuance of a building permit and occupancy permit.

Furthermore, Project development is required to comply with the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the County and RCFD, which impose design standards and requirements that seek to minimize and mitigate fire risk. Compliance with these codes and standards is ensured through the County's and RCFD's development review and building permit process.

Finally, RCFD operations are funded mostly through the County's General Fund, which consists of revenues mostly from the state and federal governments and charges for services. The County charges Development Impact Fees, which fund site acquisition, construction, and expansion of a variety of public facilities, including fire facilities. Project development would be subject to these fees.

Based on the preceding, the Project would not adversely affect RCFD ability to provide adequate service and would not require new or expanded fire facilities that could result in adverse environmental impacts. Therefore, impacts would be less than significant and no mitigation measures are necessary.

d) Police protection?

Less Than Significant Impact. The Riverside County Sheriff's Department (RCSD) provides police service to the region, including the Project Site. RCSD is comprised of the following divisions: coroner/public administrator, corrections operations, emergency operations division, major crimes bureau, media information bureau, patrol stations, project management office, recruiting, sheriff's court services, special enforcement bureau, special investigations bureau, support services, and 911 dispatch communications (RCSD 2024). The nearest sheriff station to the Project Site is the RCSD Southwest Station at 30755 Auld Road in the City of Murrieta, approximately 3.3 miles to the southwest.

Project implementation could result in a slight increase in calls for police protection services. However, considering the existing police resources available in and near the County, project impacts on police services (including response times) are not expected to occur. The Project Site is also an infill site already served by RCSD; therefore, the Project would not result in an expansion of their service area. Additionally, in the event of an emergency at the Project Site that required more resources than RCSD Southwest Station at 30755 Auld Road could provide, RCSD would direct resources to the site from other local sheriff stations nearby and, if needed, would request assistance from other nearby police departments.

Additionally, Project implementation would provide a positive impact on police services. For example, the campus would be enclosed with a combination of security gates, fences, and buildings. Installation of these features would enhance the security and safety of the campus during and after school hours. These security features would also help prevent loitering or trespassing on the campus, and thereby help prevent the need for calls for police services.

Furthermore, the County involves RCSD in the development review process in order to ensure that the necessary police protection features are incorporated into development projects. All site and building improvements proposed under the Project would be subject to review and approval by RCSD. For example, the Project would be designed with RCSD Standard Building Security Specifications and Crime Prevention through Environmental Design (CPTED) principles, which include natural surveillance, natural access control, territorial reinforcements and maintenance and management.

Finally, during the County's building plan check and development review process, the project applicant would be required to comply with the requirements in effect at the time building permits are issued. RCSD is funded mostly through the county general fund and development impact fees. Projects developed in unincorporated Riverside County pay development impact fees to Riverside County, including fees for development of criminal justice public facilities; such fees would help offset impacts of the Project. The Project's payment of such fees, as well as increased property tax revenues that would result from development of the Project, would be used by the County to help pay for police protection services and facilities.

Based on the preceding, the Project would not adversely affect RCSD's ability to provide adequate service and would not require new or expanded police facilities that could result in adverse environmental impacts. Therefore, impacts would be less than significant and no mitigation measures are necessary.

e) Schools?

No Impact. Demand for schools in an area is usually determined by the area's population. The Project does not include the development of new homes, which lead to an increase in student generation and thereby, the need for additional school facilities. The Project would not induce population growth in the area, either directly or indirectly. As shown on Figure 4, *Conceptual Site Plan*, the Project involves the development of a new charter school. Therefore, no impact would occur and no mitigation measures are necessary. In fact, Project development would result in an improvement to the existing school services and facilities in the area, as it would provide a new school campus with new building spaces, a courtyard, and other support services for the future students, staff, and personnel of the Temecula Valley Charter School.

f) Parks?

No Impact. See response to Section 3.16.a, below. As substantiated in this section, no impact would occur and no mitigation measures are necessary.

g) Other public facilities?

No Impact. The need for new or the expansion of existing library services and facilities is tied to population growth. No residential development is proposed as a part of the Project, and Project development is not expected to generate a need for new or additional library services or facilities. As shown on Figure 4, the Project involves development of a new charter school. Students of the new school campus would also make use of and be served by the resources, facilities, and programs proposed on campus, which include a library. Therefore, no impact to library services and facilities would occur and no mitigation measures are necessary.

3.16 RECREATION

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

No Impact. The increase in the use of existing parks and recreational facilities and the need for new or the construction or expansion of existing recreational facilities is tied to population growth. However, no residential development is proposed as a part of the Project. The Project involves relocation and development of a new charter school campus. Therefore, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities, nor would it require construction of new or expanded parks or recreational facilities. No impact to park and recreational facilities would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. As shown on Figure 4, *Conceptual Site Plan*, the proposed school campus would feature a number of onsite amenities that would serve the school's student population, which include a natural turf soccer field, sports courts, long jump track, campus courtyards, playfields, and playground. The Project does not involve any construction of recreational facilities beyond what is proposed to serve the school's future

students. Additionally, Project development does not propose or require construction or expansion of existing recreational facilities in Riverside County.

Construction of the Project's recreational facilities by themselves are not considered likely to result in a significant construction- or operational-related impact. Additionally, the physical impacts associated with construction of the Project's recreational facilities are also analyzed in other topical sections of this Initial Study. Therefore, impacts would be less than significant and no mitigation measures are necessary.

3.17 TRANSPORTATION

The analysis in this section is based in part on the following technical study, included as Appendix L to this Initial Study:

- *Vehicle Miles Traveled Analysis*, EPD Solutions, Inc., January 2023.

Would the project:

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

Less Than Significant Impact. Following is a discussion of the Project's potential impacts on a program, plan, ordinance, or policy addressing the circulation system. Specifically, the following discussion demonstrates that Project development would not conflict with nor preclude the County from implementing adopted programs, plans, and policies addressing the circulation system. The evaluation was conducted by reviewing County documents related to transportation: The Riverside County General Plan Circulation Element and County Ordinance No. 726.

Riverside County General Plan Circulation Element

The Riverside County General Plan Circulation Element is focused on connecting growth centers at key locations throughout the County by expanding transportation choice in the County. While the element supports continuing programs to improve travel by cars and trucks, it provides guidance on expanding the options for transit and alternative modes of transportation such as pedestrian and bicycle mobility. As stated in the Circulation Element, the intent of the element is to establish a comprehensive multi-modal transportation system that is safe, achievable, efficient, environmentally and financially sound, and accessible (County of Riverside 2020b). Following is a discussion of how the Project would be consistent with the applicable components of the Circulation Element.

Vehicular Access and Circulation

Washington Street, which forms the western Project Site boundary, serves as one of the main north-south thoroughfares through the French Valley area and provides connectivity to the Town of Winchester as well as State Route 79 to the north. Per the Southwest Area Plan of the Riverside County General Plan, Washington Street is designated as an Urban Arterial, which is defined as a highway primarily for through traffic where anticipated traffic volumes exceed four-lane capacity (County of Riverside 2020b). Washington Street currently

provides two northbound and one southbound lane north of the Project Site. South of the Project Site, Washington Street provides one northbound and one southbound lane.

Project development would not impact the functionality or use of Washington Street. As shown on Figure 4, *Conceptual Site Plan*, vehicular access to the Project Site would be provided via two driveways off Yates Road—one in the western end and the other in eastern end of the Project Site. The western driveway is an ingress only driveway, and the eastern driveway is a full ingress/egress driveway. The western driveway would serve as the main vehicular entry point for the onsite parking area. This driveway would also serve the parents arriving to drop off or pick up their kids. No driveways are proposed off of Washington Street, which would ensure that the traffic flows along Washington Street are maintained.

Design and construction of the proposed driveways would be required to adhere to the Countywide Design Standards and Guidelines, which are imposed on development projects during the County's development review and building plan check process. For example, at intersections and project driveways, a substantially clear line of sight must be maintained between the driver of a vehicle waiting at the crossroad and the driver of an approaching vehicle. Sight distance is the continuous length of roadway visible to the driver. Based on a site visit and a review of aerial photography, there are no restrictions blocking the view from proposed location of the access driveways and north- and southbound traffic on Washington Street, and sufficient sight distance would be provided. Compliance with the established design standards would ensure that hazards due to design features would not occur and that the placement of the vehicular access and circulation improvements would not create a conflict for motorists, public transit, pedestrians, or bicyclists traveling along Washington Street.

In addition, roadway improvements along Washington Street and Yates Road, which form the Project Sites western and northern boundaries, would involve activities such as paving (associated with roadway widening) , hardscaping, and striping. The roadway improvements would improve the functionality and aesthetic of these roadways. Implementation of these roadway improvements would be pursuant to the policies and standards called for in the Riverside County Southwest Area Plan.

Furthermore, the Project supports and implements the following policies of the Riverside County General Plan Circulation Element:

- **C-1.7:** Encourage and support the development of projects that facilitate and enhance the use of alternative modes of transportation, including pedestrian-oriented retail and activity centers, dedicated bicycle lanes and paths, and mixed-use community centers.

- **C-3.6:** Require private developers to be primarily responsible for the improvement of streets and highways that serve as access to developing commercial, industrial, and residential areas. These may include road construction or widening, installation of turning lanes and traffic signals, and the improvement of any drainage facility or other auxiliary facility necessary for the safe and efficient movement of traffic or the protection of road facilities.

- **C-3.13:** Design street intersections, where appropriate, to assure the safe, efficient passage of through traffic and the negotiation of turning movements.

- **C-4.1:** Provide facilities for the safe movement of pedestrians within developments, as specified in the Riverside County Ordinances Regulating the Division of Land of the County of Riverside.

Alternative Modes of Transportation

As shown on Figure 4, *Conceptual Site Plan*, pedestrian access to the Project Site would be provided via a new curb-adjacent public sidewalk along Yates Road, which forms the Project Site's northern boundary. A public sidewalk would also be provided along Washington Street, which forms the Project Site's western boundary. Currently, there is no sidewalk along the side of Yates Road or Washington Street that abuts the Project Site. The new public sidewalks, which would be constructed in conjunction with the Yates Road and Washington Street roadway improvements, would connect to the internal walkway system of the school campus near the northeastern end of the Project Site (see Figure 4). The walkways would provide a means for school children, staff, personnel, and visitors to conveniently and safely access the school campus. Also, a crosswalk connecting to the new sidewalk proposed along the south side of Yates Road and the existing sidewalks along the north side of Yates Road and east side of Washington Street would be provided near the northeastern corner of the Project Site. The proposed public sidewalk and internal walkways would be designed in accordance with and would help further the goals of the County's Safe Routes Partnership (Safe Routes Partnership 2023).

Under existing conditions there is a striped bicycle lane along Washington Street (which forms the Project Site's western boundary) near the northwestern corner of the Project Site. The bicycle lane commences at the Washington Street and Yates Road intersection and runs south along Washington Street for approximately 50 feet. The striped bicycle lane continues north along Washington Street beyond Yates Road where it currently terminates at the intersection of Washington Street and Autum Glen Circle. The on-street bicycle lane is part of the Regional Trail designated along the entire stretch of Washington Street in Figure 8, Southwest Area Plan Trails and Bikeway System, of the Southwest Area Plan.

As noted above, several roadway improvements would be implemented along Washington Street under the Project. Improvements include constructing the roadway to its ultimate right-of-way width along the portion of Washington Street that abuts the western boundary of Project Site. In addition to the roadway improvements discussed earlier, the existing striped bicycle lane on Washington Street would be extended southerly from the existing termination point (approximately 50 feet south of the Washington Street and Yates Road intersection) and end near the southwestern end of the Project Site boundary. Bicyclists are also allowed to ride on roads without dedicated bicycle lanes. Furthermore, Section 21100(h) of the California Vehicle Code allows bicyclists to ride on sidewalks.

Additionally, Project implementation would include bicycle parking spaces onsite in accordance with the provisions of Section 18.12 (Off-Street Vehicle Parking Standard), Section 18.12 (f)(2)(d) (Bicycle Parking Facilities) of the County Land Use Ordinance (County Ordinance No. 348). The bicycle racks would be placed in designated areas near the main entrance of the proposed school building, abutting the 8th grade modular buildings, and in an interior storage room in the multipurpose room. The bicycle racks and storage would be for school employees and students.

Furthermore, the Project supports and implements the following policies of the Circulation Element:

- **C 1.2:** Support development of a variety of transportation options for major employment and activity centers including direct access to transit routes, primary arterial highways, bikeways, park-n-ride facilities, and pedestrian facilities.

- **C 1.7:** Encourage and support the development of projects that facilitate and enhance the use of alternative modes of transportation, including pedestrian-oriented retail and activity centers, dedicated bicycle lanes and paths, and mixed-use community centers.

- **C 4.1:** Provide facilities for the safe movement of pedestrians within developments, as specified in the Riverside County Ordinances Regulating the Division of Land of the County of Riverside.

- **C 4.9:** Review all existing roadways without pedestrian facilities when they are considered for improvements to determine if new pedestrian facilities are warranted. New roadways should also be assessed for pedestrian facilities.

- **C 17.4:** Ensure that alternative modes of motorized transportation, such as buses, trains, taxi cabs, etc., plan and provide for transportation of recreational and commuting bicyclists and bicycles on public transportation systems. Coordinate with all transit operators to ensure that bicycle facilities are provided along and/or near all transit routes, whenever feasible. New land developments shall be required to provide bicycle facilities to existing or future planned transit routes.

Conclusion

As demonstrated above, Project development would not conflict with any components of the Riverside County General Plan Circulation Element, including the principals, goals, or policies. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Riverside County Land Use Ordinance

The Riverside County Land Use Ordinance (County Ordinance No. 348 includes the development and design standards and regulations that constitute the zoning regulations that govern development of the Project Site and help implement the Riverside County General Plan. Generally, transportation-specific ordinances, standards or regulations that apply to the Project would pertain to minimum parking requirements.

Parking for school employees and visitors would be provided onsite in the parking areas proposed in the western and northeastern portions of the Project Site. Pursuant to the provisions of the Riverside County Land Use Ordinance, 148 parking spaces are required to accommodate the Project and 148 spaces would be provided. As proposed, 32 parking spaces are dedicated to staff and 116 parking spaces are dedicated to parents and visitors. Additionally, pursuant to the provisions of the Riverside County Land Use Ordinance and the most current (2022) California Green Building Standards Code (CALGreen; Title 24, California Code of Regulations, Part 11), which are codified in County Ordinance No. 457 , parking spaces for handicap (total of 7) and clean-air vehicles (total of 33) would be provided among the 148 spaces, with the 33 clean-air vehicle spaces set aside for electric vehicle charging.

Additionally, and as noted above, Project implementation would include bicycle parking spaces onsite in accordance with the provisions of Section 18.12 (Off-Street Vehicle Parking Standard), Section 18.12 (f)(2)(d) (Bicycle Parking Facilities) of the Riverside County Land Use Ordinance. The bicycle racks would be placed in designated areas near the main entrance of the proposed school building, abutting the 8th grade modular buildings, and in an interior storage room in the multipurpose room. The bicycle racks and storage would be for school employees and students.

Based on the preceding, Project development would be consistent with the transportation-specific ordinances, standards or regulations of the Riverside County Land Use Ordinance that apply to the Project. Therefore, impacts would be less than significant and no mitigation measures are necessary.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less than Significant Impact. Section 15064.3, Determining the Significance of Transportation Impacts, of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. Section 15064.3(b) includes criteria for analyzing transportation impacts. Vehicle miles traveled (VMT), which focuses on the overall miles traveled by vehicles within a region, is the new metric for transportation analysis and replaces automobile delay (Level of Service, or LOS), which is no longer used as a criterion for determining a significant environmental effect under CEQA. For land use projects, "Vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact." (CEQA Guidelines § 15064.3).

The County's Guidelines provide criteria for projects that would be considered to have a less-than significant impact on VMT and therefore could be screened from requiring further analysis. If a project meets one of the following criteria, then the VMT impact of the project is considered less-than significant and no further analysis of VMT would be required:

- Small projects
- Projects located near high quality transit
- Local serving retail projects
- Projects providing a local essential service
- Projects located in a low VMT generating area
- Redevelopment projects

The applicability of each criterion to the Project is discussed below.

Screening Criteria 1 – Small Project Screening. According to the County's guidelines, small projects are defined as projects that would generate less than 3,000 Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$) per year. The guidelines provide examples of various types of projects that would meet the small project threshold. According to the GHG analysis prepared for the Project, the Project will not exceed the 3000 $MTCO_2e$ per year threshold (see Table 7, *Project-Related Operation GHG Emissions*). Therefore, it is presumed that the Project would meet Screening Criteria 1.

Screening Criteria 2 – Projects located near High Quality Transit. Projects that are located within one-half mile of an existing major transit stop where service interval frequency is 15 minutes or less during the

morning and afternoon peak commute periods are presumed to have a less than significant impact on VMT. The Project Site is not within one-half mile of an existing major transit stop. Therefore, Screening Criteria 2 would not apply.

Screening Criteria 3 – Local Serving Retail. The County's guidelines include a screening threshold for local serving retail projects where no single store exceeds 50,000 SF. The Project is not a retail project; in involves development of a new charter school. Therefore, Screening Criteria 3 would not apply.

Screening Criteria 4 – Local Essential Service. This criterion would apply to land uses that are considered a local essential service such as local serving day care, police or fire, government offices such as post office and library, and local parks. Typically, elementary schools would be considered a local essential service, as they generally serve a neighborhood area, and few students would reside outside of the local attendance boundary. Charter elementary schools, however, do not have a local attendance boundary and are open to any child living in California. The enrollment at most charter elementary schools consists of a majority of local students. However, because some students would live outside of the local area, Screening Criteria 4 may not be an appropriate screening threshold to apply to the Project.

Screening Criteria 5 - Low VMT Area Screening. The County's map-based screening threshold applies only to residential and office projects. Therefore, Screening Criteria 5 would not apply.

Screening Criteria 6 – Redevelopment Projects. This threshold applies to projects that replace an existing VMT-generating land use and does not result in a net overall increase in VMT. The project is not replacing an existing use; therefore, Screening Criteria 6 would not apply.

In summary, because the Project would generate less than 3,000 $MTCO_2e$ per year, Screening Criteria 1 would be met and the Project's impact on VMT would be considered less than significant and no mitigation measures are necessary.

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

No Impact. As shown on Figure 4, *Conceptual Site Plan*, Vehicular access to the Project Site would be provided via two driveways, both proposed along Yates Road. The western driveway would operate as an ingress-only driveway, and the eastern driveway would operate as a full-access driveway (all turning movements allowed). The driveways would connect to the internal drive aisle system, which would connect to the internal parking areas, serve as the student drop-off/pick-up circulation feature, and serve as the fire access lane.

Additionally, as a part of the Project, several roadway improvements would be implemented along Yates Road and Washington Street, which are public streets that are owned and maintained by the County. Improvements include constructing the roadways to their ultimate right-of-way width along the portion of Yates Road that abuts the northern boundary of the Project Site, and along the portion of Washington Street that abuts the western boundary of site. The improvements include roadway pavement for the additional travel lanes, a dedicated right turn lane (along Washington Street only), curbs and gutters, driveways (along Yates Road only), and sidewalks.

The County and RCFD have adopted design standards that preclude the construction of any unsafe roadway, circulation, or access design features. Design and construction of the proposed access and circulation improvements would be required to adhere to the County's established Standard Design Guidelines and RCFD's Technical Policies and Standards, which are imposed on development projects during the County's development review and building plan check process. For example, at intersections and project driveways, a substantially clear line of sight must be maintained between the driver of a vehicle waiting at the crossroad and the driver of an approaching vehicle. Sight distance is the continuous length of roadway visible to the driver. Based on a site visit and a review of aerial photography, there are no restrictions blocking the view from the proposed location of the access driveways and east- and westbound traffic on Yates Road, and sufficient sight distance would be provided. Compliance with the established design standards would ensure that hazards due to design features would not occur and that the placement of the vehicular access and circulation improvements would not create a conflict for motorists, pedestrians, or bicyclists traveling within or around the Project Site.

Furthermore, the Project would provide a network of low-speed internal drive aisles that would be safe and walkable for pedestrians, while maintaining an efficient circulation system for vehicles. The Project would also not include incompatible uses such as farm equipment or other unusually slow vehicles that would present a traffic hazard on area roadways.

Therefore, no impact resulting from hazards due to design features or incompatible uses would occur and no mitigation measures are necessary.

d) Result in inadequate emergency access?

Less Than Significant Impact. As outlined above, the Project would introduce new onsite vehicular access and circulation improvements. Emergency vehicles would have access to the Project Site through both driveways along Yates Road, which connect to the internal drive aisle system and fire access lane. As shown on Figure 4, *Conceptual Site Plan*, the fire access lane would loop around the drive aisles with two entrances into the campus near the southern end of the main building and another near the eastern driveway, just west of the turf soccer field.

To address emergency and fire access needs, the improvements would require to be designed and constructed in accordance with all applicable County and RCFD design standards for emergency access (e.g., minimum lane width and turning radius). For example, the drive aisles would be designed to meet the minimum width requirements of RCFD to allow the passing of emergency vehicles. Additionally, as shown on Figure 4, the drive aisle system would serve as a fire access road and become part of the onsite fire access loop.

Additionally, the Project would be required to incorporate all applicable design and safety requirements as set forth in the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the County and RCFD, such as those outlined in County Ordinance No.787 (Fire Code). Compliance with these standards is ensured through the County's and RCFD's development review and building plan check process.

Furthermore, during the development review and building plan check process, the County would coordinate with RCFD and RCSD to ensure that the necessary fire prevention and emergency response features are

incorporated into the Project and that adequate circulation and access (e.g., adequate turning radii for fire trucks) are provided within the traffic and circulation components of the Project. For example, Knox Boxes (or other approved means of emergency access to the site) would be placed where necessary (i.e., security gates) to provide access for emergency personnel. The automated security gates would be installed and operated in accordance with the Underwriters Laboratories (UL 325) and American Society for Testing Materials International (ASTM F220) standards.15 The method of gate control would be subject to review and approval by RCFD during the County's and RCFD's development review process. All site and building improvements proposed under the project would be subject to review and approval by the County, RCFD, and RCSD.

Finally, implementation of the Project would not require major road closures or otherwise impact the functionality of Washington Street or Yates Road as public safety access routes. However, some improvements would be required within the Washington Street right-of-way and Yates Road right-of-way, which may require temporary closure of a small portion of these streets. Any minor road closure would be temporary and would only be necessary during the construction activities associated with these improvements. All proposed road closures would also be subject to review and approval by the County, including issuance of an encroachment permit. Upon completion of the improvements along Washington Street and Yates Road, all road conditions would be restored to normal.

In addition, to ensure that circulation and emergency access during construction activities along Washington Street and Yates Road is adequate, the County would require preparation and implementation of a Traffic Management Plan (TMP) (which would be included as a condition of approval) for all projects that require construction in the public right-of-way. The typical TMP requires such things as the installation of K-rail between the construction area and open traffic lanes, the use of flagmen and directional signage to direct traffic where only one travel lane is available or when equipment movement creates temporary hazards, and the installation of steel plates to cover trenches under construction. The County would also require a Traffic Control/Lane Closure Permit for all work within the public right of way. Compliance with County requirements for traffic management during construction in the public right-of-way would ensure adequate emergency access is provided at all times. The TMP and Traffic Control/Lane Closure Permit would be reviewed and approved by the County's Traffic Engineer prior to the start of construction activity in the public right-of-way.

Based on the preceding, impacts would be less than significant and no mitigation measures are necessary.

3.18 TRIBAL CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural

15 ASTM F2200 provides guidance to ensure that the mechanical components of a gate are designed and installed in such a way to prevent risk to people in what are called entrapment zones. UL 325 (Standard for Safety: Door, Drapery, Gate, Louver and Window Operators and Systems) is the standard to which vehicular gate operators are designed, tested. and manufactured.

landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

No Impact. As shown on Figure 3, *Aerial Photograph*, the Project Site is currently vacant land and void of any buildings and structures, except for a steel pipe from the well site, a water tank, and livestock enclosures. The Project Site was previously developed with three modern buildings and three ancillary structures on the northern half of the Project Site, and with a well and water tank constructed near the eastern boundary between 1978 and 1985.

Additionally, prior to fieldwork being conducted for the Project Site, BCR Consulting requested an archaeological records search from the Eastern Information Center (EIC) at the University of California, Riverside (Appendix C). The records search completed a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources, and survey and excavation reports generated from the Project Site and sites within one half-mile of the Project Site. In addition, a review was conducted of the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), and documents and inventories from the California Office of Historic Preservation including the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Inventory of Historic Structures. The records research revealed that 16 cultural resource studies have been completed within the radius search, resulting in the recording of four cultural resources. One of the previous studies assessed the Project Site for cultural resources but did not identify any cultural resources within the site.

Furthermore, the cultural resources assessment conducted for the Project Site determined that there are no Traditional Cultural Resources (TCRs) listed or eligible for listing in the California Register of Historical Resources as defined in Public Resources Code section 5020.1(k) within the Project Site or within a 0.5-mile radius surrounding the Project Site.

Based on the preceding, no impact to historical resources would occur and no mitigation measures are necessary.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact With Mitigation Incorporated. Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. The intent of the consultations is to provide an opportunity for interested California Native American tribes to work together

with the CEQA lead agency (in this case, Riverside County) during the project planning process to identify and protect tribal cultural resources.

The provisions of CEQA, Public Resources Code Sections 21080.3.1 et seq. (also known as Assembly Bill 52 [AB 52]), require meaningful consultation with California Native American Tribes on potential impacts to tribal cultural resources. As defined in Public Resources Code Section 21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of Projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015.

As part of the AB 52 process, Native American tribes must submit a written request to the relevant lead agency if it wishes to be notified of projects that require CEQA public noticing and are within its traditionally and culturally affiliated geographical area. The lead agency must provide written, formal notification to the tribes that have requested it within 14 days of determining that a project application is complete or deciding to undertake a project. The tribes must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either 1): the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per Public Resources Code Section 21082.3(c).

In accordance with the provisions of AB 52, the County sent letters on March 6, 2023, to the following tribes: Pechanga Band of Luiseno Indians, Soboba Band of Mission Indians, Rincon Band of Luiseno Indians, Santa Rosa Band of Cahuilla Indians, Ramona Band of Cahuilla Mission Indians, Pala Band of Mission Indians, Agua Caliente Band of Cahuilla Indians, Cahuilla Band of Indians, Colorado River Indian Tribe, Ramona Band of Cahuilla Indians, Rincon Band of Luiseño Indians, and Quechan Indian Nation. The 30-day noticing requirement under AB 52 was completed on April 6, 2024 (30 days from the date the tribes received the notification letter). As of this date, no tribes responded to the County's AB 52 consultation notification letter with a request to consult. The Pala Band of Mission Indians declined consultation.

In the unlikely event that human remains are uncovered during ground-disturbing activities, California Health and Safety Code Section 7050.5 requires that disturbance of the site shall remain halted until the San Bernardino County Coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the California Public Resources Code. The coroner is required to make a determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority or has reason to believe

the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) so that NAHC can contact the Most Likely Descendant (MLD). The MLD shall be provided access to the discovery and will provide recommendations or preferences for treatment of the remains within 48 hours of accessing the discovery site. Disposition of human remains and any associated grave goods, if encountered, shall be treated in accordance with procedures and requirements set forth in Sections 5097.94 and 5097.98 of the Public Resources Code; Section 7050.5 of the California Health and Safety Code; and CEQA Guidelines Section 15064.5. The County would impose these state provisions as a condition of approval, and compliance would be ensured through the County's building plan check and development review process.

Additionally, Mitigation Measures CUL-2 (which is provided above in Section 3.5, *Cultural Resources*) requires that the project applicant enter into an agreement with the consulting tribe(s) for a Native American Monitor to be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching.

Therefore, impacts would be less than significant and no additional mitigation measures are necessary.

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. Following is a discussion of the Project's potential impacts on water, wastewater treatment, storm water drainage, electric power, natural gas, and telecommunications facilities.

Water Treatment Facilities

EMWD would provide potable water to the Project Site. EMWD supplies include local groundwater, recycled water and imported water from Metropolitan. EMWD estimates that potable water demands in its service area for normal years would increase from approximately 84,673 acre-feet per year (AFY) in 2020 to approximately 123,000 in 2045. EMWD estimates that it will have sufficient water supplies to meet proposed growth in its service area for normal, single-dry, and multiple-dry years (EMWD 2021).

Water demand estimates for the Project are included in Table 15. As shown in the table, the Project would have a water demand of approximately 17,878 gallons per day (20 AFY), which amounts to less than one percent of the current water demand for EMWD. Therefore, EMWD would have adequate water supplies to service the Project.

Table 15 Proposed Project Water Demands

Land Use	Square Footage	Indoor Generation Rate (gallons/1000SF/year)[1]	Total (gpd)
Charter School	53,992	33,205 (High School)	4,912
Landscaping	214,975	—	12,966[2]
Total	—	—	17,878

Source: CAPCOA 2017; DWR 2017, EMWD 2021.
Notes: gpd = gallons per day
1. The indoor water demand for "High School" from CAPCOA's CalEEMod Appendix D was used.
2. Outdoor water use is based on the California Department of Water Resources' Water Budget Workbook for New and Rehabilitated Non-Residential Landscapes. Precipitation for the Winchester area of the County was used with an annual precipitation of 10.6 inches and an average evapotranspiration of 60.5 inches. The Project includes 94,515 square feet of irrigated turf used for sports and school activities. This square footage was included in the workbook as a Special Landscaped Area. The Project also includes 110,420 square feet of shrub plantings with a drip irrigation system and low water-use plant material. The remaining 10,040 square feet will have an overhead spray system with low water-use plant material.

Additionally, EMWD would provide water delivery service to the Project Site. As a part of the Project, new onsite water lines would connect to the 12-inch water main in Yates Road. No new offsite water line construction or upsizing would be required to accommodate the Project. Construction would occur within the public right-of-way of Yates Road to make the necessary infrastructure connections to the existing water main. The proposed water system improvements would be designed and constructed in accordance with County and EMWD requirements and would require County approval.

Furthermore, the project applicant is required to pay connection fees, make security deposits, and be responsible for the water connections and associated costs necessary to service the Project Site pursuant to the EMWD Administrative Code, Section 5.108, Service Connection, Modification, and Relocation. In addition, the project applicant is required to implement the requirements of Article 6, Water Conservation, of EMWD's Administrative Code, and County Ordinance No. 859, Water Efficient Landscaping Requirements, of the County Ordinance to reduce water consumption impacts.

Finally, the Project would be designed to include a number of green building practices/features pursuant to CALGreen that would help reduce water usage and demand, including drought tolerant landscaping with automatic irrigation systems and high efficiency plumbing fixtures. Specifically, Project development would include mandatory standards from Division 5.3, Water Efficiency and Conservation, of CALGreen. Other green building practices/features would be considered by the County as the Project is refined during the design and construction phase.

Based on the preceding, project development would not require the construction of new or expanded water treatment facilities. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Wastewater Treatment Facilities

Sewer generated by the Project would be collected by EMWD and treated at the Temecula Valley Regional Water Reclamation Facility, which is owned and operated by EMWD. The treatment plant has a capacity of 23 million gallons per day (mgd) and a typical daily flow of 14 mgd. The plant has a residual capacity of 9 mgd (EMWD 2021b).

The amount of wastewater that would be generated by the Project is conservatively assumed to be 4,421 gallons per day; 90 percent of the proposed indoor water use (King County 2014). The amount of wastewater that would be generated by the Project is less than one percent of the residual 9 mgd capacity of Temecula Valley Regional Water Reclamation Facility. Therefore, Project development would not require the construction of new or expanded wastewater treatment facilities.

As a part of the Project, new onsite sewer lines would connect to the existing 8-inch sewer main in Yates Road. No offsite sewer line construction or upsizing would be required to accommodate the Project. However, some construction would occur within the public right-of-way of Yates Road to make the necessary infrastructure connections to the existing sewer main. Furthermore, the project applicant is required to pay connection fees, make security deposits, and be responsible for the sewer connections and associated costs necessary to service the property pursuant to the EMWD Administrative Code, Title 6, Sewer. The proposed wastewater system improvements would be designed and constructed in accordance with EMWD's and County's standards and would require County approval. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Stormwater Drainage Facilities

See response to Section 3.10.c.iii, above. As substantiated in this section, impacts would be less than significant and no mitigation measures are necessary.

Electricity and Natural Gas Facilities

The Project would have a total annual electricity demand of 445,487 kilowatt-hours (kWh) and a total natural gas demand at project buildout of 1,292,592 kilo British thermal units per year (KBTU/yr). Electricity would be supplied by SCE and natural gas would be supplied by the Southern California Gas Company (SoCalGas). All new utility infrastructure will be installed underground or placed in enclosed spaces (e.g., utility closets).

Electricity would be provided by SCE via existing infrastructure in the immediate area of the Project Site. Total electricity consumption in SCE's service area is forecasted to increase by approximately 18,000 GWh between 2016 and 2030 (CEC 2018). SCE forecasts that it will have sufficient electricity supplies to meet demands in its service area; and the electricity demand due to the project is within the forecast increase in SCE's electricity demands. Project development would not require SCE to obtain new or expanded electricity supplies.

Natural gas would be provided by SoCalGas via existing infrastructure in the immediate area of the Project Site. The Project would result in an annual net increase in natural gas demand of 1,292,592 kBTU (refer to Section 3.6, *Energy*). The total gas consumption in the SoCalGas service area was approximately 7,406 million therms in 2019, with slightly decreasing demand projected up to the year 2030 (CEC 2019). The natural gas consumption rate for the Project is typical for projects of this size and is a modest increase in gas use in the context of SoCalGas' service territory.

In addition, Project development would be required to comply with energy efficiency standards by Title 24 of the California Administrative Code and the Appliance Efficiency Regulations. Project development would also comply with CALGreen requirements related to energy and water conservation. These measures would help

decrease electricity and gas consumption by the Project. Therefore, the Project would not result in a substantial increase in natural gas and electrical service demands. SCE and SoCalGas would not need to expand their supply and transmission facilities to handle the demand generated by the Project. Impacts would be less than significant and no mitigation measures are necessary.

Telecommunication Facilities

The Project would include onsite connections to telecommunication existing services in the area. All new utility infrastructure would be installed underground or placed in enclosed spaces (e.g., utility closets). The construction-related impacts associated with these improvements are analyzed throughout this Initial Study as part of the Project's development. Therefore, impacts would be less than significant and no mitigation measures are necessary.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. EMWD has adequate water supplies to meet project water demands, as substantiated in Section 3.19.a, above.

In addition, the project applicant is required to implement the requirements of Article 6, Water Conservation, of EMWD's Administrative Code, and County Ordinance No. 859, Water Efficient Landscaping Requirements, of the County Ordinance to reduce water consumption impacts. Development of the Project would also be required to comply with the provisions of CALGreen, which has requirements for indoor water use reduction and site irrigation conservation. Specifically, project development would be required to adhere to the mandatory nonresidential measures in CALGreen Division 5.3, Water Efficiency and Conservation, including Sections 5.303, Indoor Water Use, and 5.304, Outdoor Water Use.

Based on the preceding, there are adequate water supplies to meet the water demands of the Project, and Project development would not require EMWD to obtain new or expanded water supplies. Therefore, impacts would be less than significant and no mitigation measures are necessary.

c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As substantiated above in Section 3.19.a, there is existing wastewater treatment capacity in the region for estimated Project wastewater generation. Project development would not require construction of new or expanded wastewater treatment facilities. Therefore, impacts would be less than significant and no mitigation measures are necessary.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Solid waste and recycling generated by the Project would be collected and hauled away by CR&R and transported to/disposed of at the appropriate facilities serving the County.

3. Environmental Analysis

Enclosures with solid roof tops and swinging gates would accommodate bins for solid waste, organic waste, and recyclable materials provided in three areas of the project site to adequately serve the Project.

In 2019, approximately 88 percent of the municipal solid waste landfilled from the unincorporated area of Riverside County was disposed of at the Badlands Sanitary Landfill, El Sobrante Landfill, and Lamb Canyon Sanitary Landfill (CalRecycle 2019a). Capacity and disposal data for the three landfills is shown in Table 16. As shown in the table, the landfills have a residual capacity of 10,068 tons per day.

Table 16 Landfill Capacity

Landfill Name	Current Remaining Capacity (tons)[1]	Maximum Daily Disposal Capacity (tons)	Average Daily Disposal, 2020 (tons)[2]	Residual Daily Disposal Capacity (tons)	Estimated Close Date
El Sobrante Landfill	143,977,170	16,054	10,996	5,058	2051
Badlands Sanitary Landfill	7,800,000	4,800	2,813	1,987	2026
Lamb Canyon Sanitary Landfill	19,242,950	5,000	1,977	3,023	2032
Total	—	—	—	10,068	—

Sources: CalRecycle 2019b, 2019c, 2019d, 2019e.

1. A Volume-to-Weight conversion rate of 2,000 lbs/cubic yard (1 tons/cubic yard) for "Compacted - MSW Large Landfill with Best Management Practices" is used as per CalRecyle's 2016 Volume-to-Weight Conversion Factors https://www.epa.gov/sites/production/files/201604/documents/volume_to_weight_conversion_factors_memorandum_04192016_508fnl.pdf.
2. Average daily disposal is calculated based on 300 operating days per year. Each of the three facilities is open six days per week, Monday through Saturday, except certain holidays.

The Project is estimated to generate approximately 378 pounds per day (ppd) or 0.19 tons per day of solid waste, as shown in Table 17.

Table 17 Project-Generated Solid Waste

Land Use	Square Feet	Generation Rate (lbs/square foot/day)	Total (ppd)
Charter School	53,992	0.007	378

Source: CalRecycle 2019f.
Notes: ppd = pounds per day

As demonstrated in Table 16, there is adequate landfill capacity for the Project's forecast solid waste disposal, and Project development would not require additional landfill capacity.

Additionally, Project development would be required to implement the requirements of County Ordinance 745, , Compulsory Collection and Disposal of Solid Waste and Recyclable Material Within Specified Unincorporated Areas of Riverside County,. The intent and purpose of this chapter is for the County to comply with state law on solid waste management. The project applicant would also be required to participate in a organic waste recycling program pursuant to the requirements of Assembly Bill (AB) 1826. AB 1826, which was enacted in 2014, mandated organic waste recycling for businesses. The commercial organics recycling law took effect on April 1, 2016. Organic waste includes food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. As of September 2020, businesses

that generate two or more cubic yards per week of solid waste (including recycling and organic waste) must arrange for organic waste recycling services. In compliance with these state and local requirements, enclosures with solid roof tops and swinging gates that would accommodate bins for solid waste, organic waste, and recyclable materials would be provided to adequately serve the Project.

Furthermore, substantial reductions in solid waste from construction materials can be achieved through recycling, reuse, and diversion programs. For example, Project development would be required to comply with the provisions of the most current CALGreen (, Adoption of the 2022 California Green Building Standards Code, of the County Ordinance No. 457), which outlines requirements for construction waste reduction, material selection, and natural resource conservation. Section 5.408, Construction Waste Reduction, Disposal, and Recycling, of CALGreen requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

Based on the preceding, impacts on landfill capacity and the County's ability to attain solid waste reduction goals would be less than significant and no mitigation measures are necessary.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. See response to Section 3.19.d.

The following federal, state, and local laws and regulations govern solid waste disposal:

- EPA administers the Resource Conservation and Recovery Act of 1976 and the Solid Waste Disposal Act of 1965, which govern solid waste disposal.
- AB 939 (Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.) requires every California city and county to divert 50 percent of its waste from landfills by the year 2000 by means such as recycling, source reduction, and composting. In addition, AB 939 requires each county to prepare a countywide siting element specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled for a 15-year period.
- AB 341 (Chapter 476, Statutes of 2011) increases the statewide waste diversion goal to 75 percent by 2020, and mandates recycling for businesses producing four or more cubic yards of solid waste per week or multi-family residential dwellings of five or more units.
- SB 1383 establishes goals to reduce the landfill disposal of organics by achieving a 50 percent reduction in the 2014 level of statewide disposal of organic waste by 2020 and a 75 percent reduction by 2025. SB 1383 granted CalRecycle the regulatory authority to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food be recovered for human consumption by 2025.

- AB 1826 currently requires businesses and multi-family complexes that generate two or more cubic yards of solid waste, recycling, and organic waste combined per week to start recycling organic waste. This requirement was instated by CalRecycle to meet the target set by SB 1383.
- AB 1327 (California Solid Waste Reuse and Recycling Access Act of 1991) requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

Project-related construction and operation phases would be implemented in accordance with all applicable federal, state, and local laws and regulations governing solid waste disposal. Therefore, no impact would occur and no mitigation measures are necessary.

3.20 WILDFIRE

Wildland fire protection in California is the responsibility of either the local government, state, or federal government. State Responsibility Areas (SRA) are the areas in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large area over 31 million acres to which the California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services.

Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by the California Department of Forestry and Fire Protection (CAL FIRE) under contract to local governments. CAL FIRE uses an extension of the SRA Fire Hazard Severity Zone model as the basis for evaluating fire hazard in LRAs. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. Riverside County Fire Department Office of Emergency Services currently provides fire protection and emergency medical services to Riverside County.

Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in an LRA. The Project Site is within a Moderate to High Fire Hazard Severity Zone mapped by the California Department of Forestry and Fire Protection in an SRA and in the LRA the closed VHFHSZ is approximately 0.55 miles northwest of the Project Site (CAL FIRE 2024). Land between the edge of the nearest FHSZ and the Project Site is open space, residential development, and institutional uses.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. As described above, the Project Site is within Moderate to High Fire Hazard Severity Zone in an SRA. However, as discussed in Section 3.9, *Hazards and Hazardous Materials*, the Project would have no impact on emergency response or emergency evacuation plans. The Project would also be required to incorporate all applicable design and safety standards required in the CBC to ensure that Project development would not interfere with the provisions of local emergency services. For example, emergency vehicles would have access

to the internal drive aisle system and fire access lane on the Project Site. Therefore, the Project would not impact an adopted emergency response plan or emergency evacuation plan. No impact would occur and no mitigation measures are necessary.

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?

No Impact. The Project would not result in a change of prevailing winds. However, due to the proximity of the Project Site to a VHFHSZ in an LRA, future students and employees would be subject to risks associated with wildfire hazards, including exposure to pollutant concentrations and the potential for the spread of a wildfire.

The Project Site has relatively flat topography with gentle slopes (approximately 6.7 percent grade) to the northwest and there are no major slopes or bluffs adjacent to the Project Site. As discussed in Section 3.9, *Hazards and Hazardous Materials*, the Project Site would have good access roads to accommodate emergency response vehicles and would be served by adequate water infrastructure. The Project would also be required to comply with the California Building Standards Code and the California Fire Code, which include standards to minimize the ignition and spread of wildfires due to slopes. Therefore, the Project would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur and no mitigation measures are necessary.

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?

No Impact. As a part of the Project, onsite water lines (for potable water, irrigation and fire suppression purposes) and five hydrants would be installed onsite pursuant to requirements of the RCFD to ensure adequate fire protection infrastructure. The fire hydrants would connect to the new onsite water lines with fire sufficient flows supplied by EMWD. The proposed drainage system, sewer lines, and new utility infrastructure improvements would be designed and constructed in accordance with County requirements.

Additionally, several roadway improvements would be implemented along Yates Road and Washington Street. Paved vehicle areas create an opportunity for vehicles to create accidental wildfires, since dragging chains or vehicle parts, worn brakes, and exposed wheel rims have the potential to create sparks on the roadway. However, construction of roadway and other utility systems would be required to comply with Public Resources Code 4442, which requires that engines that use hydrocarbon fuels be equipped with a spark arrester, and that these engines be maintained in effective working order to help prevent fire. Additionally, the Fire Safe Regulations require that buildings be setback from the center of the roadway by 30 feet, and with defensible space requirements, this would further minimize the risk of wildfire on the Project Site. Therefore, the installation of this infrastructure on-site would not exacerbate wildfire risk.

As previously mentioned, the Project Site is located within proximity of a VHFHSZ of the LRA. However, Project development is required to comply with the most current adopted fire codes, building codes, and

nationally recognized fire and life safety standards of the County and RCFD, which impose design standards and requirements that seek to minimize and mitigate fire risk. Therefore, no impact would occur and no mitigation measures are necessary.

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?

No Impact. As described above, the Project development would not exacerbate wildfire risk on- off-site. During construction and grading, enforcement of the NPDES regulations and BMPs in the SWPPP, would minimize erosion, control runoff, and prevent deleterious materials or pollutants from entering the County's storm drain system. For example, BMPs would include but are not limited to installation of perimeter silt fences; installation of silt fences around stockpile and covering of stockpiles; and stabilization of disturbed areas where construction ceases for a determined period of time (e.g., one week) with erosion controls. BMPs are discussed further in Section 3.10, *Hydrology and Water Quality*. Additionally, Project construction activities would implement the requirements of the adopted CBC, County Ordinance 457, to ensure effective control of not only sediment discharge, but also of pollutants associated with sediments (e.g., nutrients, heavy metals, and certain pesticides).

The Project would also include swales that drain to a large underground detention structure connected to the infiltration basin to treat the runoff generated by the Project. Furthermore, the proposed landscaping would be water conserving and have deep root systems that enable soil stabilization and minimize erosion. Management of stormwater and erosion using the BMPs described above would help to prevent risk of downslope or downstream folding or landslides as a result of runoff, post-fire slope instability, or drainage changes. Therefore, the Project would not expose people or structures to significant risks related to runoff, slope instability, or drainage changes. No impact would occur, and no mitigation measures are necessary.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact With Mitigation Incorporated. As shown in Figure 3, *Aerial Photograph*, the Project Site consists of vacant land. There are no buildings or structures onsite. The Project Site is in a developing area of the County that is surrounded by residential development to the north beyond Yates Road, the San Diego Aqueduct to the east, vacant land to the west across Washington Street, and a single-family home on a large property to the south. As demonstrated in Section 3.4, *Biological Resources*, impacts to biological resources would be reduced to a level of less than significant with implementation of Mitigation Measure BIO-1. Additionally, as demonstrated in Section 3.5, *Cultural Resources*, no historic resources were identified onsite, and therefore the Project does not have the potential to eliminate important examples of California history or prehistory. Impacts were deemed to be less than significant. As also demonstrated in Sections 3.5, impacts to archeological resources would be reduced to a level of less than significant with implementation of Mitigation

Measure CUL-1. Furthermore, as demonstrated in Section 3.18, *Geology and Soils*, impacts to archeological resources would be reduced to a level of less than significant with implementation of Mitigation Measures GEO-1 through GEO-7.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. The issues relevant to Project development are confined to the immediate Project Site and surrounding area. Additionally, the Project Site is in an area of the County where supporting utility infrastructure (e.g., water, wastewater, and drainage) and services (e.g., solid waste collection, police and fire protection) currently exist and are adequate to serve the Project. As substantiated in this Initial Study, Project implementation would not require the construction of new or expansion of existing utility infrastructure or services. The Project Site is also generally too small in scope to appreciably contribute to existing cumulative impacts.

Furthermore, impacts related to other topical areas such as air quality, GHG, hydrology and water quality, and traffic would not be cumulatively considerable with development of the Project in conjunction with other cumulative projects.

In consideration of the preceding factors, the Project's contribution to cumulative impacts would be rendered less than significant; therefore, Project impacts would not be cumulatively considerable.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. The Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this Initial Study. As discussed in the respective topical sections of this Initial Study, implementation of the Project would not result in significant impacts, either directly or indirectly, in the areas of air quality, GHG, geology and soils, hazards and hazardous materials, noise, hydrology and water quality, or wildfire, which may cause adverse effects on human beings.

3. Environmental Analysis

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4. Mitigation Monitoring and Reporting Program

Project-specific mitigation measures have been categorized in matrix format, as shown in Table 16. The matrix identifies the environmental factor, specific mitigation measures, schedule, and responsible monitor. The mitigation matrix serves as the basis for scheduling the implementation of, and compliance with, all mitigation measures and conditions of approval.

4. Mitigation Monitoring and Reporting Program

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Table 16 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
Biological Resources					
BIO-1	To avoid impacts to nesting birds within or adjacent to the Project Site and to comply with the California Fish and Game Code Sections 3503 and 3513 and the Migratory Bird Treaty Act, any site clearing and ground-disturbing activities should occur during the non-nesting (or nonbreeding) season for birds (generally, September 1st to January 31st). If this avoidance schedule is not feasible, prior to the commencement of any proposed actions (e.g., site clearing, grading) during the breeding/nesting season, a qualified monitoring biologist contracted by the project applicant shall conduct a preconstruction survey(s) to identify any active nests in and adjacent to the Project Site no more than 14 days prior to initiation of the action. If the biologist does not find any active nests that would be potentially impacted, the proposed action may proceed. However, if the biologist finds an active nest within or directly adjacent to the action area (within 100 feet) and determines that the nest may be impacted, the biologist shall delineate an appropriate buffer zone (generally 300 feet for songbirds and 500 feet for raptors) around the nest using temporary plastic fencing or other suitable materials, such as barricade tape and traffic cones. The final buffer zone shall be determined by the biologist in consultation with applicable resource agencies; in consideration of species sensitivity and existing nest site conditions; and in coordination with the construction contractor. The qualified biologist shall serve as a construction monitor when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests. Only specified activities (if any) approved by the qualified biologist in coordination with the construction contractor shall take place within the buffer zone until the nest is vacated. Activities that may be prohibited within the buffer zone by the biologist include but are not limited to grading	Project Applicant, Construction Contractor, Biologist	Prior to the commencement of construction-related activities that have the potential to disturb any active nests during the nesting season		

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	and tree clearing. Once the nest is no longer active and upon final determination by the biologist, the proposed action may proceed within the buffer zone. The monitoring biologist shall prepare a survey report summarizing his/her findings and recommendations of the preconstruction survey. Any active nests observed during the survey shall be mapped on a current aerial photograph, including documentation of GPS coordinates, and included in the survey report. The completed survey report shall be submitted to the Riverside County Planning Department prior to the commencement of construction-related activities that have the potential to disturb any active nests during the nesting season.				
BIO-2	Birds and their nests are protected by the Migratory Bird Treaty Act (MBTA) and California Department of Fish and Wildlife (CDFW) Codes. Since the project site supports suitable nesting bird habitat, removal of vegetation or any other potential nesting bird habitat disturbances shall be conducted outside of the avian nesting season (February 1st through August 31st). If habitat must be cleared during the nesting season, a preconstruction nesting bird survey shall be conducted. The preconstruction nesting bird survey must be conducted by a biologist who holds a current memorandum of understanding with the County of Riverside. If nesting activity is observed, appropriate avoidance measures shall be adopted to avoid any potential impacts to nesting birds. The nesting bird survey must be completed no more than 3 days prior to any ground disturbance. If ground disturbance does not begin within 3 days of the survey date a second survey must be conducted. If nesting birds are discovered within the project site, the project's biologist shall mark a buffer around the nest. At a minimum, construction activities shall stay outside of a 300-foot buffer around the active nests. For raptor species, the buffer shall be expanded to 500 feet. The approved buffer zone shall be marked in the field with construction fencing, with no vegetation clearing or ground	Project Applicant, Construction Contractor, Biologist	Prior to issuance of a permit for grading, including permits for clearing, grubbing, and/or stockpiling		

Table 16 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	disturbance shall commence until the qualified biologist and Riverside County Environmental Programs Division (EPD) of the Planning Department verify that the nests are no longer occupied, and the juvenile birds can survive independently from the nests. Once the young have fledged and the left the nest, or the nest otherwise becomes inactive under natural conditions, normal construction activities may occur. The project's biologist shall monitor the nest during construction activity to ensure no disturbance to the birds are occurring and shall have the authority to halt ground disturbing activities if they are impacting the nesting birds. Prior to issuance of a permit for grading, including permits for clearing, grubbing, and/or stockpiling, the project's consulting biologist shall prepare and submit a report, documenting the results of the survey, to EPD for review. The preconstruction survey shall cover the project site and any offsite improvements. In some cases, EPD may also require a Monitoring and Avoidance Plan prior to the issuance of a rough grading permit.				
BIO-3	Prior to building final inspections, Riverside County Environmental Programs Division shall conduct a site visit to verify that all lighting conforms to the approved lighting plan. All lighting must be either directed away or shielded to prevent artificial lighting from reaching sensitive natural resources or habitat (identified as RCA Conservation areas, Public Quasi Public lands or Riparian/Riverine habitat).	Project Applicant, Riverside County Environmental Programs Division	Prior to building final inspections		
BIO-4	The proposed project shall comply with the Western Riverside Multiple-Species Habitat Conservation Plan (MSHCP) Sections 6.1.4 Urban/Wildlands Interface Guidelines (UWIG). Lighting shall be directed away from the MSHCP conservation area(s) to the east to protect wildlife and other biological resources from direct night lighting. Shielding shall be incorporated in the project design to ensure ambient lighting in the MSHCP Conservation Area(s), Public/Quasi-Public (PQP) Lands, and/or	Project Applicant, Architect, Construction Contractor	Prior to building permit issuance		

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	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	Riparian/Riverine/Vernal Pool areas do not increase over existing conditions. A lighting plan shall be submitted and approved by the Riverside County Environmental Programs Division prior to building permit issuance. A site visit may be required for verification purposes.				
BIO-5	The proposed project shall comply with the Western Riverside Multiple-Species Habitat Conservation Plan (MSHCP) Sections 6.1.4 Urban/Wildlands Interface Guidelines (UWIG). Lighting shall be directed away from the MSHCP conservation area(s) to the east to protect wildlife and other biological resources from direct night lighting. Shielding shall be incorporated in project designs to ensure ambient lighting in the MSHCP Conservation Area(s), Public/Quasi-Public (PQP) Lands, and/or Riparian/Riverine/Vernal Pool areas do not increase. A lighting plan must be submitted to EPD for review and approval. The lighting plan must clearly demonstrate that all light fixtures are directed away or shielded from any sensitive natural resources or habitat.	Project Applicant, Architect, Construction Contractor	Prior to building permit issuance		
BIO-6	Pursuant to Objectives 6 & 7 of the Species Account for the Burrowing Owl included in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), within 30 days prior to the issuance of a grading permit, including permits for clearing, grubbing, and/or stockpiling, a pre-construction presence/absence survey for the burrowing owl shall be conducted by a qualified biologist and the results provided in writing to the Riverside County Environmental Programs Department. The pre-construction survey shall cover the project site and any offsite improvements. If it is determined that the project site is occupied by the Burrowing Owl, take of "active" nests shall be avoided pursuant to the MSHCP and Migratory Bird Treaty Act. However, if a Burrowing Owl is present, relocation outside of the nesting season (February 1 through August 31) by a qualified	Project Applicant, Construction Contractor, Biologist	Within 30 days prior to the issuance of a grading permit, including permits for clearing, grubbing, and/or stockpiling		

Table 16 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	biologist shall be required. The County Biologist shall be consulted to determine appropriate type of relocation (active or passive) and translocation sites. A grading permit may be issued once the species has been relocated.				
Cultural Resources					
CUL-1	Prior to the issuance of grading permits, the project applicant shall provide a letter to the Riverside County Planning Department from a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications for Archeology as defined at 36 CFR Part 61, Appendix A (Professional Archeologist). The letter shall state that the project applicant has retained such an individual, and that the consultant will be on call during all grading and other significant ground-disturbing activities. In the event that potential archeological resources are discovered during ground-disturbing activities, all such activity shall cease in the immediate area of the find (within a 60-foot buffer), and the professional archeological monitor shall have the authority to halt any activities adversely impacting potentially significant cultural resources until they can be formally evaluated. Suspension of ground disturbances in the vicinity of the discovery shall not be lifted until the archaeological monitor has evaluated the discovery to assess whether it is classified as a significant cultural resource pursuant to the CEQA (California Environmental Quality Act) definition of historical (State CEQA Guidelines 15064.5[a]) and/or unique archeological resource (Public Resources Code 21083.2[g]). Work may continue in other areas of the Project Site outside of the buffered area and for other project elements while the encountered find is evaluated. If upon completion of the assessment the archeological monitor determines that the find qualifies as a significant	Project Applicant, Archeologist, Construction Contractor	Prior to the issuance of grading permits		

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cultural resource, the qualified archeologist shall make recommendations on the treatment and disposition of the deposits, which shall be developed in accordance with all applicable provisions of California Public Resource Code Section 21083.2 and State CEQA Guidelines Sections 15064.5 and 15126.4. For example, if significant cultural resources are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan (MTP). The MTP shall be overseen and implemented by the archeologist and include mitigation measures to follow regarding identification and recording methods, and evaluation and final treatment of any cultural resources identified. Likely mitigations would involve temporary avoidance of the area of discovery plus a 60-foot buffer, development of a cultural resources eligibility evaluation plan in consultation with and the Riverside County Planning Department, and test excavation to determine eligibility of any discovery for California Register of Historical Resources listing eligibility. Final disposition of any artifacts recovered shall be determined during development of the evaluation plan and would be likely to include reburial onsite, donation to a Native American entity, or curation at a federally approved repository. The draft MTP, and any/all archaeological/cultural documents created (isolate records, site records, survey reports, testing reports, etc.), shall be provided to the Riverside County Planning Department. The archaeologist shall monitor the remainder of the Project Site and implement the MTP accordingly. The archaeologist shall prepare a final report describing all identified and curated resources (if any are found) and submit the report to the Riverside County Planning Department. If disturbed resources are required to be collected and preserved, the project applicant shall be required to participate financially up to the limits imposed by Public Resources Code Section 21083.2.				

Table 16 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
CUL-2	Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this mitigation measure. Upon verification, the County Archaeologist shall clear this mitigation measure. This agreement shall not modify any condition of approval or mitigation measure.	Project Applicant, Archeologist, Construction Contractor, Native American Monitor	Prior to the issuance of grading permits		
Geology and Soils					
GEO-1	The project applicant shall retain a qualified paleontologist approved by the County of Riverside to create and implement a project-specific plan for monitoring site grading/earthmoving activities (project paleontologist). The project paleontologist retained shall review the approved development and grading plans and conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the project paleontologist in a Paleontological Resource Impact Mitigation Program (PRIMP), which shall be submitted to the County Geologist for review and approval prior to the issuance of a grading permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standards and Society of Vertebrate Paleontology standards, are as follows:	Project Applicant, Paleontologist, Construction Contractor	Prior to the issuance of grading permits		

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Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
• A corresponding and active County Grading Permit (BGR) Number must be included in the title of the report. PRIMP reports submitted without a BGR number in the title will not be reviewed. • PRIMP must be accompanied by the final grading plan for the subject project. • Description of the proposed site and planned grading operations. • Description of the level of monitoring required for all earth-moving activities in the project area. • Identification and qualifications of the qualified paleontological monitor to be employed for grading operations monitoring. • Identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for recovery of large specimens. • Direction for any fossil discoveries to be immediately reported to the property owner who in turn will immediately notify the County Geologist of the discovery. • Means and methods to be employed by the paleontological monitor to quickly salvage fossils as they are unearthed to avoid construction delays. • Sampling of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. • Procedures and protocol for collecting and processing of samples and specimens. • Fossil identification and curation procedures to be employed. • Identification of the permanent repository to receive any recovered fossil material. Pursuant the County "SABER Policy", paleontological fossils found in the County should, by preference, be directed to the Western				

Table 16 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
Science Center in the City of Hemet. A written agreement between the property owner/project applicant and the repository must be in place prior to site grading. • All pertinent exhibits, maps, and references. • Procedures for reporting of findings. • Identification and acknowledgement of the project applicant for the content of the PRIMP as well as acceptance of financial responsibility for monitoring, reporting and curation fees. The property owner and/or project applicant on whose land the paleontological fossils are discovered shall provide appropriate funding for monitoring, reporting, delivery and curating the fossils at the institution where the fossils will be placed and will provide confirmation to the County that such funding has been paid to the institution. All reports shall be signed by the qualified paleontologist responsible for the report's content. All reports shall also be signed by all other parties responsible for the report's content (e.g., Professional Geologist), as necessary A signed electronic copy of the report, project plans, and all required review applications shall be uploaded to the County's PLUS Online System. The following sources shall be used for this purpose: • https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/Filing_Instructions_Paleontological_Report_Review_Application.pdf • https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/PLUS_Online_Upload_Instructions_Paleontology.pdf • https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/Supplemental_Information_Form_PALEO.pdf Reports and/or review applications shall not to be submitted directly to the County Geologist, Project				

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	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	Planner, Land Use Counter, Plan Check, or any other County office. In addition, the project applicant shall submit proof of hiring (i.e., copy of executed contract, retainer agreement, etc.) a project paleontologist for the in-grading implementation of the PRIMP.				
GEO-2	The project applicant shall submit a Paleontological Monitoring Report prepared for site grading operations at the project site. The report shall be certified by the professionally qualified paleontologist responsible for the content of the report. The paleontologist shall be on the County's Paleontology Consultant List. The report shall include the findings made during all site grading activities and an appended itemized list of fossil specimens recovered during grading (if any) and proof of accession of fossil materials into the pre-approved museum repository. In addition, all appropriate fossil location information shall be submitted to the Western Science Center, San Bernardino County Museum and Los Angeles County Museum of Natural History, at a minimum, for incorporation into their Regional Locality Inventories. A signed electronic copy of the report shall be uploaded to the County's PLUS Online System via the following source: • https://planning.rctlma.org/sites/g/files/aldnop416/files/2023-06/PLUS%20Online%20Upload%20Instructions%20-%20Paleontology%20-%20Updated%20June%202023.pdf Reports and/or review applications are not to be submitted directly to the County Geologist, Project Planner, Land Use Counter, Plan Check, or any other County office.	Project Applicant, Paleontologist, Construction Contractor	Prior to the issuance of grading permits		

Table 16 Mitigation Monitoring Requirements

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
Hazards and Hazardous Materials					
HAZ-1	Any earthmoving activities resulting in disturbances to subsurface soils within the project site shall be managed in accordance with a site-specific Soil Management Plan (SMP), which shall be prepared and submitted to the Riverside County Department of Environmental Health (RCDEH) prior to the commencement of any earthmoving activities. The SMP shall include preparation of a report to be submitted to the RCDEH for review and approval. An environmental professional representative should be on-site during earthmoving activities to monitor affected areas in accordance with the SMP and shall also be in attendance during pre-earthmoving activities (e.g., pre-construction meeting, kick-off meeting, etc.) to convey responsibilities and scope of work to each involved project team member pursuant to the SMP. The SMP shall include the following measures: • Screening, handling, and managing soil during excavation activities. • Application of South Coast Air Quality Management District Rule 1166 for the Site related to the potential for VOC-impacted soils to be encountered during excavation activities. • Identification of suspected impacted soil. • Managing and stockpiling excavated and graded soil (e.g., dust control, stockpile maintenance). • Collecting and analyzing samples from stockpiled soil as necessary for waste characterization. • Specifying threshold levels to evaluate whether excavated soil is suitable for on-site reuse. • Handling/disposal of soil with confirmed impacts.	Project Applicant, Construction Contractor, Environmental Specialist	Prior to the commencement of any earthmoving activities		

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Table 16 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	• Handling and transportation of site soils with respect to sensitive receptors in the vicinity of the site (e.g., schools, religious centers, residents). • Addressing subsurface features of potential environmental concern (e.g., abandoned USTs, oil wells, sumps, clarifiers, buried drums) in the event they are encountered during excavation activities. • Protocol for contractors for keeping potentially impacted soils from contacting stormwater at and/or the groundwater beneath the site.				
HAZ-2	The contents of the two abandoned 55-gallon unlabeled drums on the southcentral portion of the project site hall be evaluated for characteristic hazardous waste in accordance with California Code of Regulations, Title 22, Division 4.5 and Code of Federal Regulations, Title 40, which includes ignitability, corrosivity, reactivity, and toxicity. Sampling and analysis of materials and wastes, for hazardous waste identification purposes, shall be in accordance with US EPA SW-846. Drum content evaluation shall be performed prior to the commencement of any earthmoving activities on the project site.	Project Applicant, Construction Contractor, Environmental Specialist	Prior to the commencement of any earthmoving activities		

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