COUNTY OF RIVERSIDE
ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Project Case Type (s) and Number(s): Conditional Use Permit CUP230002
Lead Agency Name: County of Riverside Planning Department
Address: 4080 Lemon Street 12th Floor, Riverside, CA 92501
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Applicant's Address: 13121 Brookhurst Street, Suite C, Garden Grove, CA 92843

I. PROJECT INFORMATION

The Muslim Mortuary and Cemetery Committee (Applicant) proposes to construct the Crescent Garden Cemetery (Project) consisting of an approximately 20,000-plot cemetery, with support facilities including a ceremonial cleansing facility for washing the body prior to burial, a chapel, a caretaker's residence, an equipment shed, and associated roads, utilities and landscaping in three phases over 15 years on 46.4 acres of 84.99 acres over 21 parcels at the end of Garfield Road in the community of Meadowbrook. No crematorium is proposed as a part of this Project as burials will follow Muslim ceremonial traditions, and an estimated 10 to 15 burials may be performed per month. The Project Site is composed of 21 assessor parcels, and no lot line or parcel merger is proposed. Refer to **Figure 1 - *Regional Vicinity***; **Figure 2A – *Project Site Parcels***; and **Figure 3 - *Project Site USGS View***, located at the end of this section.

The Muslim Mortuary and Cemetery Committee (MMCC) is an independent non-profit organization, licensed by the State of California Cemetery and Funeral Bureau, providing Islamic burial services to over 5,000 families through established cemeteries in Anaheim, Westminster, LaVerne, and Colton since 1991. The MMCC office is located in Garden Grove and staffed with a dedicated Funeral Director. Its operations rely on highly trained staff and volunteers to provide funeral services in accordance with the Islamic practices. Each of the existing cemeteries are smaller, with between 100 and 1,250 burial plots. The existing cemeteries cannot be expanded, and a new cemetery, more centrally located in Southern California that can provide a long-term solution for burial and funeral services, is needed. The MMCC proposes this Project to provide a long-term solution for burial services for the Muslim community of Southern California.

GENERAL PROJECT FEATURES

Phased Development: Site development is planned in three phases over 15 years (**Figure 4A – *Phasing Plan***), although the facility would be developed over time as finances allow. It should be noted that this environmental review evaluates the Project in its entirety, including all phases.

Overall, the Project would develop 46.4 acres of the 84.99 acres over 21 parcels, leaving approximately 38.6 acres of undeveloped terrain. **Figure 4B – *Open and Developed Areas*** shows the concept plans for the site and areas within the approximately 85-acre site that would be developed and undeveloped. Within the undeveloped area is approximately 10.6 acres as the future right-of-way for Theda Street that will not be developed by the Project but may or may not be developed by the County of Riverside. The Project does not propose any grading or development in the future right-of-way for Theda Street. Appendix J – *Project Plans* provides the full plan set.

On-Site Facilities. The Project proposes to ultimately develop 46.4 acres of on-site improvements in phases including an approximately 5,559 square foot (SF) single story Ceremonial Cleansing Facility (CCF) , a two-story approximately 11,079 SF chapel, an approximately 2,090 SF two-story caretakers residence, an approximately 1,358 SF equipment shed, interior roads, 24.6 acres of level burial plots,

landscaping and irrigation, an on-site septic system, four water quality/detention basins, and associated utilities. Refer to **Figure 5A** and **Figure 5B - *Building Elevations and Profiles*** for details on the buildings. However, improvements may be shifted between phases depending on funding availability and overall site need. **Figures 6A, 6B and 6C** provide visual renderings of the proposed facilities.

Access and Private Interior Roads/Paths. The Project's main entry is at the eastern terminus of Garfield Road near the western boundary of the Project Site and will serve as the single point of entry. The main entry, which is within the Project's private property boundary, has a queue for a minimum of two vehicles if the entry gate is closed, and a cul-de-sac area in the public right-of-way of Garfield Road to allow non-guests an opportunity to turn around. The entry gates are planned to be open from dawn to dusk, and a guard house would be available at the entry gate. The Garfield Road entry leads directly into the facility's parking lot to easily accommodate guests in either the parking lot or the cemetery interior private roadways, therefore, there would be no traffic backing up onto Garfield Road or parking on the residential streets. The private interior roads of the cemetery are planned to be approximately 24 feet to 32 feet wide and designed to provide additional parking on the sides for use by mourner's families who visit to pay homage to their loved one. The interior private roads would be asphalt pavement with stabilized decomposed granite along each side for additional parking and pathways. The private roadways have also been designed in accordance with the requirements of the Riverside County Fire Department's, which approved the Project design on December 12, 2024.

Site Security, Fencing and Lighting. Site security consists of a wrought iron fence that would be placed along the western property boundary of the site, as well as a wrought iron gate at the entry. Chain link fencing will surround the north and south boundaries of the property. Chain link fencing along the east perimeter will follow the limits of grading and landscape improvements to allow for the existing regional trail network to cross onto the property, outside of the fence line, and continue off-site. Temporary construction fencing would be placed around the construction areas during the various phases of construction. Lighting is only planned for the parking lot and building areas and would shielded and be of the type that would not cause lighting to spill off-site. No lighting is planned for the cemetery grounds. **Figure 7 – *Photometric Analysis*** identifies that the light would not be intrusive or spill off site. Cemetery operations would occur from dusk to dawn. Any minimal nighttime lighting would be for the caretaker residence and would be what is minimally necessary for security lighting. The nighttime security lighting will consist of low energy LED lamps at the entry gates, guard station, wall scones on the CCF, Chapel buildings, and caretaker residence entrance and a LED light at the equipment shed entry.

Landscaping Design. Overall, the landscape plan provides for approximately 1.8 acre of irrigated landscaping to be installed consisting of shrubs, groundcover and trees that are moderate to very low water usage. Refer to **Figure 8A – *Landscape Plan***. Following the grading, the areas used for burial would follow stormwater control measures or may be hydroseeded with native vegetation and temporary on-grade irrigation may be placed after grading to control erosion. Burial plots would be developed as needed. The finished burial plots would consist of white stones placed on top of each plot, with poured concrete bands around each of the plots that are approximately 3.5-foot by 8-foot each, oriented perpendicular to the direction of Mecca, Saudi Arabia. **Figure 8B – *Typical Burial Section*** provides a schematic of a typical burial plot, along with a sample finished plot area currently in place at the Westminster Memorial Park and Mortuary, which would be similar to the plots to be developed on the Project Site. Trees planned for the entry include fruitless olive and date palm, while the interior roads and pathways would be lined with accent trees such as Palo Verde and Marina Strawberry, and shade trees such as Jacaranda, Australian willow, evergreen Chinese Elm and Coast Live Oak. The water quality/detention basin slopes and portions of the bottoms will be planted with live groundcovers, grasses and shrubs in accordance with the County of Riverside standards.

Water Quality/Detention Basins. Proposed water quality/detention improvements have been designed in accordance with the County of Riverside's design criteria. A Water Quality Management Plan (WQMP) has been prepared and approved by the County on September 19, 2024 (refer to

Appendix F-2). Drainage runoff from the improved site will be collected in a series of surface and underground drainage facilities and conveyed to the four proposed water quality/detention basins or to a modular wetland system before exiting to existing natural channels.

. The proposed drainage facilities are designed to convey the 100-year peak flow generated in the watershed under post-project conditions, reduce the 10-year post-project runoff to less than pre-project conditions, and to mitigate water quality and hydromodification impacts of the proposed development. The Project includes rip-rap pads and/or energy dissipators to reduce flow velocities to less than 6 fps at all points of discharge to natural streams.

Operations and Staffing. All operations of the cemetery site would comply with the California Cemetery and Funeral Bureau regulations and requirements for licensing. The Crescent Garden Cemetery facility anticipates approximately 10 to 15 funeral services per month. Assuming an average of 20 visitors per funeral service, the expected total initial visitors are not anticipated to exceed approximately 300 people per month. The Crescent Garden Cemetery would operate from dawn to dusk, seven days per week, and be staffed by three full-time employees, consisting of a licensed Funeral Director, an operations manager who will also serve as a clergy, and a groundskeeper for maintenance.

The cemetery employs a “natural burial” process which is used in various parts of the world and minimizes the impact on the environment by allowing for a poignant return to the earth. The natural burial process has been successfully used by the MMCC (Applicant) over the past 30 years at the other four Southern California cemeteries (Westminster Memorial Park, Melrose Abbey-Anaheim, LaVerne Memorial Park, and Montecito).

The natural burial process does not use embalming chemicals or formaldehyde, nor does it include placing the deceased in a casket, both of which processes can leach harmful chemicals into the soil over time. Instead, in summary, the deceased is washed with natural soap and water, wrapped in a cotton shroud cloth, and placed directly on a bed of gravel in a subgrade vault. The burial generally occurs within 24 hours of death to ensure that the deceased body is handled prior to decomposition.

The natural burial practice to be employed at the Crescent Gardens Cemetery would include the following:

- Washing: This occurs in the Ceremonial Cleansing Facility. The deceased is ritually washed with soap and water, a process known as ghusl or tajheez. This would be done as soon as possible after death. No chemicals or embalming fluids are utilized. The water from the cleansing is estimated to be approximately 20 gallons per body. The body washing would occur within a designated room of the Ceremonial Cleansing Facility that has a floor drain that would be connected to a below ground storage tank that is separate from the septic system. This separate tank would be emptied by a licensed wastewater/septic hauler. The MMCC staff would work with the family of the deceased to schedule and coordinate the required washing of the body. In addition, traditionally the family members of the deceased usually participate in performing the body wash.

- Shrouding: The deceased is wrapped in a white cloth, a process known as kafan or takfeen. The number of pieces of cloth used depends on the deceased's gender, with men typically using three and women using five.

- Other stages of the funeral include funeral prayers, known as salat al-janazah or janazah salah, and a procession to carry the body to the gravesite. The prayers would most likely occur at the gravesite until the chapel is constructed, when prayers may be held at either the graveside or the chapel.

Burial: The deceased is buried as soon as possible, usually within 24 hours but no more than three days, in a designated plot that has been developed for the individual. The deceased burial plot is designed to face Mecca, Saudi Arabia, one of the holiest places of Islam. The burial plots are designed to be deep enough to prevent odor from escaping and to keep animals from compromising the grave. Plot development consists of excavating a rectangle shape in the earth that would be approximately 5 feet deep 3 feet wide. A four-sided concrete vault with a gravel bottom would be placed in the excavated space. The body would be placed in the concrete vault, and a concrete lid would be placed on top of the vault. Approximately 18 inches of soil would be placed on the top of the lid. White-colored stones are then placed over the plot, along with a headstone.

Burial plots would be developed as needed. Once a row of plots are filled, the row is finished with concrete bands that would surround each plot. A typical vault detail and photo of a sample of finished plots is in Figure 8B. Excess soil from plot development would be stored in an area of a future phase.

Off-Site Improvements

The project proposes the following off-site improvements:

- Garfield Road would end as a proposed cul-de-sac west of the entry gates of Crescent Gardens cemetery. The proposed cul-de-sac will be dedicated to the County as a public facility. Proposed improvement would include paved road curb to curb, parkway and sidewalk that support fire department vehicle turning radius requirements.

- The Project has been designed to avoid encroachment into Theda Street, a future north-south roadway planned by the County with 100-feet wide right-of-way, which lies along the eastern side of the cemetery and which would bisect a portion of the proposed Phase 1 and Phase 3 cemetery grounds. No improvements would be constructed by the Project in proposed Theda Street right-of-way.

- Per the Environmental Justice discussion, the Project includes a water line estimated at $675,000 with 25 residential laterals and a trail estimated at $55,000.

Utilities

- Water: Water will be supplied by the Elsinore Valley Municipal Water District, which provided a letter agreeing to serve the Project provided that the Applicant provide a line extension (Appendix I). As such, the Project would replace an existing 4-inch water line with an 8-inch water line that will be extended approximately 2,810 linear feet from the Project Site at Garfield Road, extending to Jarvis Street, then north along Jarvis Street, and to a point of connection at an existing 8-inch domestic water line near Senola Avenue per Elsinore Valley Municipal Water District.

- Sewer: Municipal sewer infrastructure does not exist in the Project vicinity. Therefore, the Project would install a septic system where each building would have its own individual Onsite Waste Treatment System (OWTS) systems. The OWTS design includes storage septic tanks, draining into chamber leach lines. The OWTS system was reviewed and approved by the Riverside County Department of Environmental Health Services on October 28, 2024.

CONSTRUCTION PHASING

Site development is planned to occur in three phases over 15 years (Figure 4A), as identified below, although the grounds and facilities would be developed as finances allow and in accordance with

grading and stormwater control plans. Cemetery grounds and facilities planned in Phase 1 are anticipated to be completed first, in approximately 12 months, although the actual development schedule would depend on available finances. Phase 1 grading provides soil balancing of cuts and fills so no soil import is anticipated; Phases 2 and 3 will require import of fill material. Therefore, future phases would be constructed in smaller sections periodically as fill soil becomes available. It is the intent that as fill material becomes available, it would be either stockpiled on site for use in the next phase, or it would be stockpiled and used to construct smaller areas in the future phases, based on the amount of soil available.

PHASE 1: YEAR 1

Overall, Phase 1 would include the construction of all interior roads, the ceremonial cleansing facility with parking, a care takers residence, equipment shed, three water quality/detention basins, approximately 7.8 acres of cemetery grounds, and associated landscaping, lighting and utilities as described herein.

Cemetery Grounds: Approximately 7.8 acres of cemetery land would be developed east and southeast of the chapel site and offer a projected 6,230 plots. All the earthwork in Phase 1 consists of a cut and fill designed to balance, therefore, there would be no import or export of material. The individual plots would be developed on an as needed basis, therefore, only the main Phase 1 area would be graded.

Entry Area/Hardscape. Patrons to the cemetery will enter from Garfield Road, a public road, where a cul-de-sac will be constructed. The entry is designed as a focal point for the cemetery, with the CCF, caretaker's residence, and a 145-space parking area to serve funeral services situated on the north side, and the chapel situated along the south side. While the CCF and the 2,090 SF caretaker's residence with equipment shed and parking lot would be constructed as part of Phase 1, only a 6,974 SF footprint pad for the chapel would be established, and the chapel building would be constructed at a later date. Graveside services would be held until the chapel is constructed.

Wrought iron entry gates and wrought iron fencing would be installed along the western property boundary. Chain link fencing would surround the north and south boundaries of the property. Chain link fencing along the east perimeter will follow the limits of grading and landscape improvements to allow for the existing regional trail network to cross onto the property, outside of the fence line, and continue off-site.

Also as part of Phase 1, the Applicant would improve two existing dirt driveways with decomposed granite that are located along Garfield Road, on the western edge of the Property. One benefits the residence to the north (APN 349-170-001) and one benefits the residence to the south (APN 349-180-034). An access easement would be provided through the Project site's southern boundary for the existing dirt road which is used by the residence located at APN 349-180-026.

Stormwater Improvements: Proposed stormwater improvements include storm drain conduits, catch basins, concrete ditches ang gutters, and four water quality/detention basins. Three of the four water quality/detention basins would be constructed as part of Phase 1: One approximately 4,384 SF water quality/detention basin located north and east of the parking lot, and one approximately 4,928 SF basin on the southeast parking lot, and one approximately 17,513 SF basin near southeast corner of the Project Site east of the Theda Street right-of-way.

Ceremonial Cleansing Facility (CCF). The approximately 5,559 SF CCF would be located near the entrance at Garfield Road and is designed for burial preparations and small family-oriented gatherings as needed. It also will provide temporary offices to support making funeral and burial arrangements, including religious services ancillary to the CCF, with family attendance. A crematorium is not planned for the CCF. Services would be held graveside until the chapel is constructed, and the interior roads are designed to accommodate parking adjacent to the gravesite areas.

The CCF would consist of a body washing and preparation area, an office, a conference room, a viewing room, and a religious service area which is dedicated to CCF use only. The building is designed with separate air circulation controls between the body preparation room(s) and the offices/service/viewing area. The cleansing rooms have separate self-contained drainage systems that flow into an underground tank, separate from the on-site sewerage treatment system, where the used wash water would be pumped for disposal by a licensed hauler.

The CCF building would be one story structure in Mediterranean architectural style using a regional take on modernism. The proposed building sits on a 2 feet high podium with entrances from the parking lot. The building design utilizes large-format porcelain tiles, natural wood, and arch windows to contrast with smooth white cement plaster. The colors & building materials utilize a neutral and natural color palate. An emphasis on natural light is created through large arch window openings that wrap around the entire building, producing well-lighted interior spaces. The building systems are designed with sustainability in mind, including high-efficiency HVAC, low-flow plumbing fixtures, infrastructure for solar panels, and LED lights resulting in a 53 percent lighting reduction below the energy code minimum.

Equipment Shed. The approximately 1,358 SF shed will house cemetery grounds supplies and equipment such as a backhoe.

Landscape. Landscaping would be complete for all areas of Phase 1. The CCF and chapel area are designed with fire resistant plants and grasses while the interior roads would be lined with various trees, and sloped areas not used for gravesites would be low-water use groundcovers and shrubs. The species of plants to be utilized, and their placement, are consistent with the requirements for a project that is located in a Very High Fire Hazard Zone.

Interior Roads (Private). Three, private, interior roadways would be established to connect the CCF and chapel area with the Phase 1 cemetery grounds. “A” Street, the primary entrance to the grounds from the CCF, would be approximately 2,435 feet long, traversing east-west, and ending in a cul-de-sac within the eastern portion of Phase 1. “B” Street would be approximately 788 feet long, traversing generally north-south, ending with its intersection with “A” Street. “D” Street is designed to be approximately 382 feet long, and traverse east-west along the southern portion of the Phase 1 grounds.

Utilities: The Project would install two septic systems on site to serve employees and visitors. The septic tanks and leach fields would be installed in suitable locations designed to serve the chapel, CCF and caretaker residence and connect to the leach fields. Additionally, the Project would establish its water service by replacing an existing 4-inch water line with an 8-inch water line that will be extended approximately 2,810 linear feet from the Project Site at Garfield Road, extending to Jarvis Street, then north along Jarvis Street, and to a point of connection at an existing 8” domestic water line near Senola Avenue per Elsinore Valley Municipal Water District.

Off-Site Road Improvements. Improvements to Garfield Road including developing the cul-de-sac with curb and gutter and streetlights.

PHASE 2: YEAR 2 THROUGH YEAR 10

Cemetery Grounds: Approximately 9.9 acres of cemetery land would be developed northeast of the chapel area and offer approximately 6,500 plots. Site work requires a cut of approximately 18,500 cubic yards, and fill of approximately 49,000 cubic yards, for a total fill import of approximately 30,500 cubic yards. Because of the fill soil requirement, it is anticipated that the 9.9 acres would be developed in subphases, with development dictated by the amount of soil available. As the imported soil becomes available from regional sources, it would be stockpiled in the southern portion of the site. Smaller sections of the Phase 2 area would be developed in consultation with a licensed civil engineer and County grading permits.

Chapel. The two-story approximately 11,079 SF, chapel would be located south of the entrance at Garfield Road, south of the CCF, and is designed for family-oriented gatherings to celebrate the life of the deceased. It will provide permanent offices to support making funeral and burial arrangements, including religious services ancillary to the CCF, with family attendance. The chapel building would be one-story and similar in architecture to the CCF in that it would utilize large-format porcelain tiles, natural wood, and arch windows to contrast with smooth white cement plaster. The colors & building materials utilize a neutral and natural color palate. An emphasis on natural light is also created through large arch window openings that wrap around the entire building, producing well-lighted interior spaces. The building systems are designed with sustainability in mind, including high-efficiency HVAC, low-flow plumbing fixtures, infrastructure for solar panels, and LED lights resulting in a 53 percent lighting reduction below the energy code minimum.

Caretaker Residence: The approximately 2,090 two-story caretaker's residence with a 400 SF garage would be standard single-family residential construction, also with a Mediterranean style. The residence would be located just east of the CCF.

Landscape. The interior roads would be lined with various trees, and sloped areas not used for gravesites would be low-water use groundcovers and shrubs.

Stormwater Improvements: Proposed stormwater improvements include storm drain conduits, catch basins, concrete ditches and gutters and one approximately 1,625 SF water quality/detention basin located in the northeast portion of the cemetery.

Interior Roads (Private). Two private interior roadways would be established to connect the CCF and chapel to the northern portion of the cemetery grounds. "B" Street would be approximately 1,781 feet long, connecting with the intersection of "A" and "B" streets from Phase 1, continuing north along the western side of the Phase 2 grounds. At the northernmost boundary, it will connect with "C" Street and traverse approximately 1,434 feet south along the east side of the Phase 2 grounds, to the connection with "A" Street in the Phase 1 area. "E" Street, approximately 391 feet long would traverse east-west, in the center of the grounds, connecting "B" Street on the west and "C" Street on the east.

PHASE 3: YEAR 11 THROUGH YEAR 15

Cemetery Grounds: Approximately 7.2 acres of cemetery land would be developed east of the CCF/chapel area and offer approximately 5,900 plots. Site work requires a cut of approximately 17,000 cubic yards, and fill of approximately 91,000 cubic yards, for a total fill import of approximately 74,000 cubic yards. Because of the fill soil requirement, it is anticipated that the 9.9 acres would be developed in sub-phases, with development dictated by the amount of soil available. As the imported soil becomes available from regional sources, it would be stockpiled in the southern portion of the site. Smaller sections of the Phase 3 area would be developed in consultation with a licensed civil engineer and County grading permits.

Landscape. The interior roads would be lined with various trees, and sloped areas not used for gravesites would be low-water use groundcovers and shrubs.

Interior Roads (Private). There will be no roads constructed in Phase 3. Roads will have been constructed in Phases 1 and Phase 2.

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

B. Total Project Area:

Residential Acres:	**Lots:**	**Units:** 0	**Projected No. of Residents:**
Commercial Acres:	**Lots:**	**Sq. Ft. of Bldg. Area:**	**Est. No. of Employees:**
Industrial Acres:	**Lots:**	**Sq. Ft. of Bldg. Area:**	**Est. No. of Employees:**
Other: Cemetery	**Lots:** 21	**Sq. Ft. of Bldg. Area:** 20,086	**Est. No. of Employees:** 3

C. Assessor's Parcel No(s): Refer to Table 1*: Project APN Listing* for the complete list of parcels and their proposed uses. The parcel locations are graphically represented on Figure 2A, and their respective zoning is represented on **Figure 2B – *Zoning and Land Use***.

Table 1: Project APN Listing

APN	Parcel Acreage	Proposed Project Use	General Plan Land Use	Zoning
349-170-003	6.36	Cemetery Grounds	VLDR	RR
349-170-004	5.23	Cemetery Grounds	VLDR	RR
349-170-005	5.28	Cemetery Grounds	VLDR (western portion) and RM (eastern portion)	RR
349-170-006	5.28	Cemetery Grounds (1)	VLDR (western portion) and RM (eastern portion)	RR
349-170-007	3.82	Chapel, CCF, Parking, Landscaping, Caretakers residence, equipment shed	VLDR	RR
349-170-008	4.46	Open Space	VLDR	RR
349-170-009	4.46	Chapel, CCF, Parking, Landscaping, Caretakers residence, equipment shed	VLDR	RR
349-170-010	4	Chapel, CCF, Parking, Landscaping, Caretakers residence, equipment shed	VLDR	RR
349-170-011	4	Open Space / Caretaker Residence	VLDR	RR
349-170-012	3.82	Chapel, CCF, Parking, Landscaping, Caretakers residence, equipment shed	VLDR	RR
349-170-013	5.23	Cemetery Grounds (1)	VLDR (western portion) and RM (eastern portion)	RR
349-180-002	5.01	Chapel, CCF, Parking, Landscaping, Caretakers residence, equipment shed	VLDR	RR
349-180-004	5.03	Cemetery Grounds (1)	RM	RR
349-180-005	5.01	Chapel, CCF, Parking, Landscaping, Caretakers residence, equipment shed	VLDR	RR
349-180-006	3.99	Chapel, CCF, Parking, Landscaping, Caretakers residence, equipment shed	VLDR	RR
349-180-007	4.53	Chapel, CCF, Parking, Landscaping, Caretakers residence, equipment shed	VLDR	RR
349-180-008	0.45	Chapel, CCF, Parking, Landscaping, Caretakers residence, equipment shed	VLDR	RR
349-180-016	4.37	Chapel, CCF, Parking, Landscaping, Caretakers residence, equipment shed	VLDR	RR
349-180-017	0.45	Chapel, CCF, Parking, Landscaping, Caretakers residence, equipment shed	VLDR	RR
349-180-020	2.21	Cemetery Grounds (1)	RM	RR
349-180-035	1.99	Roads and Landscaping	(public road)	N/A

Notes:

(1) Slopes greater than 25 percent will not be developed.

Street References: Garfield Road

D. **Section, Township & Range Description or reference/attach a Legal Description:** Section 22 Southeast, Township 5 South, Range 4 West, San Bernardino Base and Meridian, *Lake Elsinore* USGS Quad.

E. **Brief description of the existing environmental setting of the project site and its surroundings:** The Project Site has a gentle topographic relief with elevations that range from approximately 1,584 to 1,650 feet above mean sea level, sloping in a northeasterly gradient. A more mountainous terrain exists on the east and northeast sides of the Project Site.

North: The Project Site primarily abuts vacant property on the north side, zoned R-R (Rural Residential). One single-family residence is situated near the northern property boundary of Project parcel 0349-170-009, which is designed for the CCF, future caretaker residence, equipment shed, and parking. The Project would provide a dedicated crushed decomposed granite driveway from the Project's main entrance on Garfield Road to the residence, which is situated on APN 349-170-001. Additionally, two residences are situated in the northeast corner, adjacent to Project APN 349-170-004, which is designed as cemetery grounds for the Phase 2 area.

South: The Project Site primarily abuts vacant property on the south side, zoned R-R (Rural Residential). Two residences are situated on APNs 340-180-034 and APN 340-180-026, outside the Project's southwestern boundary, adjacent to Project APN 349-180-035, which is designed for the chapel, parking and landscaped water quality/detention basin. The Project also provides a dedicated decomposed granite driveway to these residences from Garfield Road.

West: The Project main entrance is from Garfield Road, located along the western boundary. Garfield Road is developed with single family residential. Two residences are adjacent to the Project entrance (APN 349-150-065 and APN 349-150-074). Along the northwest portion, the Project Site primarily abuts vacant property, zoned R-R (Rural Residential). The southwestern portion of the Project is planned for Phase 3 cemetery grounds; one residence (APN 349-180-034) is situated outside the southwestern portion of the Project's southwestern boundary.

East: The Project Site abuts vacant property along the east side zoned R-R (Rural Residential). A Southern California Edison transmission utility line exists along the east and northeast boundary of the site.

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

- **Land Use:** The Project Site lies within the Elsinore Area Plan (ELAP). The Land Use of the parcels range from Rural Mountainous (RM) with a General Plan Foundation Component of Rural and a Land Use of Very Low Density Residential (VLDR) with a General Plan Foundation Component of Community Development. The Project Site is located within the unincorporated community of Meadowbrook, which is characterized by very low-density residential development and vacant properties set amid rolling hills.

  The Project does not lie within any of the policy or Land Use Overlay areas of the ELAP.

- **Circulation:** The site is within the ELAP. Applicable circulation policies contained in the Plan include the following:

- ELAP 8.1 Design and develop the vehicular roadway system per Figure 7, Circulation, and in accordance with the functional classifications and standards specified in the Planned Circulation Systems section of the General Plan Circulation Element.

- ELAP 8.2 Maintain Riverside County's roadway Level of Service standards as described in the Level of Service section of the General Plan Circulation Element.

The Project includes street improvements to Garfield Road, an east-west local paved roadway that leads to the Project Site, which is an unpaved north-south local roadway. Garfield Road will end easterly as a cul-de-sac west of the entry gates of Crescent Gardens cemetery and dedicated to the County. This will include paved road curb to curb, parkway and sidewalk that support fire department vehicle turning radius requirements.

The Project has been designed to avoid encroachment into the potential right-of-way for a future secondary arterial to be developed by the County, known as Theda Street. A portion of the Phase 1 area will cross the Theda Street right-of-way, and a portion of the Phase 1 and Phase 3 areas would abut Theda Street. However, the Applicant has worked with the County Transportation Department to ensure that the cemetery grounds and cemetery road crossing would not interfere with the development of Theda Street.

Access to the Project Site includes the following potential routes from State Route 74 (SR-74), which is approximately 0.75 mile west of the site.

- From SR-74: Greenwald Avenue south, to Wallace Street; east to Jarvis Street; south to Garfield Road, east into the Crescent Gardens Cemetery.

- From SR-74: River Road west, to Maze Avenue; south to Jarvis Road, east to Garfield Road, east into the Crescent Gardens Cemetery.

- (Future Potential) From SR-74: Mauricio Avenue, east to proposed Theda Street (possible future secondary arterial to be developed by the County) to Crescent Gardens Cemetery, at "A" Street, which would be modified as necessary at the time.

The General Plan Element identifies that Level of Service (LOS) "C" applies to all development proposals within the ELAP. The Proposed Project is anticipated to generate a total of 89.5 daily roundtrips, based on Trip Generation analysis (Appendix H). According to the County's traffic study guidelines, the Project generates less than 100 vehicle trips during the peak hours and is exempt from preparing a Traffic Impact Analysis. Therefore, it is assumed that the Project would maintain a LOS C consistent with the General Plan.

Trails: An extensive system of proposed trails and bikeways exists within the ELAP planning area connecting the various neighborhoods with the recreational resources of the Cleveland National Forest and the regional trail system. The Elsinore Area Plan trail system is mapped in the ELAP, Figure 8, *Trails and Bikeway System*. A Regional Trail: Urban/Suburban is mapped on ELAP Figure 8 to traverse south and east of the Project Site's Phase 2 and Phase 3 areas. Trail spurs from the Regional Trail have been informally developed by trail users and local residents to traverse the Project Site's eastern boundary. These informal trail spurs would be abandoned (Refer to Project Figure 4A). Therefore, circulation policies relative to trails are not applicable as the Project would not impact the Regional Trail as mapped on ELAP Figure 8.

Scenic Highways: SR-74, located approximately 0.75-mile west of the Project Site, has been designated as an Eligible State Scenic Highway. The western segment of SR-74 is a secondary County entrance road and will serve as a link to Orange County's system of scenic routes. The scenic highways designated within the ELAP are depicted on ELAP Figure 9, *Scenic Highways*. The applicable policy is the following:

- ELAP 10.1 Protect Interstate 15 and State Route 74 from change that would diminish the aesthetic value of adjacent properties through adherence to the Scenic Corridors sections of the General Plan Land Use and Circulation Elements.

Due to the terrain of the area, and that the cemetery would resemble the existing condition, the Project would not be visible or distinguishable from SR-74. Therefore, the Project is consistent with the circulation policies relative to scenic highways.

CETAP Corridors: A Community Environmental Transportation Acceptability Process (CETAP) Corridors are transportation corridors include a range of transportation options such as highways or transit and are developed with careful consideration for potential impacts to habitat requirements, land use plans, and public infrastructure. The East-West CETAP Corridor may pass through the Elsinore Area Plan along State Route 74, or to the north of it. The Project Site does not lie within any area identified being within a CETAP Corridor.

- **Multipurpose Open Space:** The Proposed Project is not located in an Open Space area or adjacent to an Open Space area. No natural open space land is required to be preserved within the boundaries of this Project.

  Watersheds, Floodplains, and Watercourse Policies. The ELAP contains a major portion of the Santa Margarita River watershed, which includes Murrieta Creek. However, the Project Site does not lie within these watershed areas, according to ELAP Figure 10, therefore, policies related to Watersheds, Floodplains, and Watercourses are not applicable to the Project.

  Mineral Extraction. The Proposed Project Site is not located in an area that contains regionally important aggregate and clay resources, as well as non-regionally important mineral resources. Therefore policies regarding Mineral Extraction are not applicable to the Project.

  Oak Tree Preservation. The Project Site does not contain oak woodlands that should be protected to preserve habitat and the character of the area. Therefore policies regarding Oak Tree Preservation are not applicable to the Project.

  Multiple Species Habitat Conservation Plan. The property is located in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Conservation Area but is not located within any Criteria Cell or Public/Quasi-Public (PQP) Land. The Project is located south and adjacent to 3491-700-02, which designated as a PQP parcel. No grading activities or portions of the Project would be developed immediately adjacent to the PQP Parcel. A Multiple Species Habitat Conservation Plan Consistency Analysis was prepared for the Project (Appendix B-1) and approved in December 2024.

- **Safety:** The Proposed Project's Safety policies are as follows:

Flooding and Dam Inundation. The Project Site is not located within a Flood and Dam Inundation Zone as identified on ELAP Figure 10 – *Special Flood Hazard Areas*. Therefore, policies regarding Flooding and Dam Inundation are not applicable.

Wildland Fire Hazard. The Project Site lies within a Very High/High/Moderate Fire Hazard Severity Zone (FHSZ) as identified in EALP Figure 11 – *Wildfire Susceptibility.* The applicable policy for Wildfire Hazard is as follows:

- ELAP 18.1 Protect life and property from wildfire hazards through adherence to the Fire Hazards section of the General Plan Safety Element.

Of the 85-acre Project Site, 24.6 acres are to be utilized as cemetery grounds, which would be gravel and cement. Approximately 1.8 acres would be iIrrigated landscaping along the interior roads, pathways slopes and entrance that contains the buildings. The landscaping is designed as drought tolerant and fire-resistant species. The Project is requried to comply with the Fire Hazards section of the General Plan Safety Element. Therefore, the Project is consistent with the applicable policies.

Seismic. The Project Site is not situated in or near a fault zone as identified in ELAP Figure 12 – *Seismic Hazards.* Therefore, policies regarding seismic hazards are not applicable.

Slope. The Project Site is not situated in or near a steep slope area as identified in ELAP Figure 13 – *Steep Slope*, nor within an area identified on ELAP Figure 14 – *Slope Instability*. The Project Site is located adjacent and to the west of Steep Slopes as mapped on ELAP Figure 14. The applicable policy for *Slope* is as follows:

- ELAP 20.1 Identify and preserve the ridgelines that provide a significant visual resource for Elsinore through adherence to the Hillside Development and Slope section of the General Plan Land Use Element and the Scenic Resources section of the Multipurpose Open Space Element.

The Project Site's eastern boundary exists at the base of rolling hillsides. Some of the Project Site's topography has been mapped by the Applicant as having slopes of 25 percent or greater (refer to Project **Figure 9: *On-Site Slope Topography,* *located at the end of this section***). The Project would grade these slopes to 2:1 or gentler, depending on design for use as a road or gravesites. Therefore, the Project is consistent with ELAP Slope policy.

Airport. The Project site is not located within 2 miles of any airport, therefore, there are no airport land use compatibility policies that apply to the Project Site.

- **Noise:** Noise associated with thie Proposed Project will be during the initial grading and building construction, which is temporary. Operational noise will meet all applicable Noise policies.

- **Housing:** The Proposed Project includes one single-family residence that would be occupied by the caretaker.

- **Air Quality:** The Proposed Project would control any fugitive dust during grading and construction activities pursuant to South Coast Air Quality Management District (SCAQMD)requirements. The Proposed Project meets all applicable Air Quality Element policies.

- **Healthy Communities:** Not applicable. The Proposed Project is a cemetery within a residential area. The Project would not result in any air quality, hazardous materials,noise or other impacts that would affect Healthy Communities.

- **Environmental Justice:** The Project would develop and operate a cemetery. The Project is located in the Good Hope/Meadowbrook Environmental Justice Area. **Figure 10 – *Environmental Justice Communities,*** located at the end of this section, provides the Project Site location in relation to sensitive communities. In compliance with General Plan Policy HC 15.1, outreach events have been conducted during the planning process for the Project. Additionally, the Applicant has provided a completed an Environmental Justice Form showing that the Proposed Project complies with all applicable Environmental Justice Policies as the applicant will be providing a water line estimated at $675,000 for water line with 25 residential laterals and trail estimated at $55,000.

B. General Plan Area Plan(s): Elsinore Area Plan (ELAP).

C. Foundation Component(s): Rural (eastern portion of the site), Community Development (remainder of site).

D. Land Use Designation(s): Rural Mountainous (RM) (eastern portion of the site) and Very Low Density Residential (VLDR) (remainder of the site).

E. Overlay(s), if any: N/A

F. Policy Area(s), if any: N/A

G. Adjacent and Surrounding:

1. **General Plan Area Plan(s):** Elsinore

2. **Foundation Component(s):** Rural (adjacent to the eastern portion of the Project Site), Community Development (north, south, west of the Project Site).

3. **Land Use Designation(s):** Rural Mountainous (RM) (adjacent to the eastern portion of the Project Site), Very Low Density Residential (VLDR) (adjacent to the north, west, and south of the Project Site).

4. **Overlay(s), if any:** N/A.

5. **Policy Area(s), if any:** N/A

H. Adopted Specific Plan Information

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

2. **Specific Plan Planning Area, and Policies, if any:** Not Applicable.

I. Existing Zoning: Rural Residential (R-R). Pursuant to County Municipal Code Section 17.16.010, cemetery use is permitted provided a Conditional Use Permit has been issued. Churches, temples and other places of worship are permitted with a Plot Plan approval. Single-family residences are permitted. Because the CCF, chapel and single-family residence is associated with the cemetery operations, a Conditional Use Permit is required to approve the Project.

J. Proposed Zoning, if any: No change.

K. Adjacent and Surrounding Zoning: Rural Residential (R-R)

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

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

III. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED
☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project, described in this document, have been made or agreed to by the project proponent. **A MITIGATED NEGATIVE DECLARATION** will be prepared.
☐ I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED
☐ I find that although the proposed project could have a significant effect on the environment, **NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED** because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.
☐ I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An **ADDENDUM** to a previously-certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.

☐ I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.
☐ I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and **a SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required: (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following:(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or,(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.

Signature	Date
Printed Name	Planning Director

INSERT **Figure 1 -** ***Regional Vicinity***

INSERT **Figure 2A -** ***Project Site Parcels***

INSERT **Figure 2B –** ***Zoning and Land Use***

INSERT Figure 3 - ***Project Site USGS View***

INSERT **Figure 4A – *Phasing Plan***

INSERT **Figure 4B –** ***Open and Developed Areas***

INSERT **Figure 5A** - ***Building Elevations and Profiles – Sheet 1***

INSERT **Figure 5B** - ***Building Elevations and Profiles – Sheet 2***

INSERT to **Figure 6A – *Architectural Rendering: Site***

INSERT to **Figure 6B –** ***Architectural Rendering: CCF and Entry***

INSERT to **Figure 6C – *Architectural Rendering – Chapel***

INSERT to **Figure 7 – *Photometric Analysis***

INSERT **Figure 8A – *Landscape Plan***

INSERT **Figure 8B –** ***Typical Burial Section***

INSERT Figure 9 *On-Site Slope Topography*

Figure 10 Environmental Justice Communities

ENVIRONMENTAL ISSUES ASSESSMENT

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

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

Source(s): Riverside County General Plan Figure C-8 "Scenic Highways;" ELAP, Figure 9 "Scenic Highways"; Project Engineering and Renderings.

Findings of Fact:

a) The Project Site is not located within a scenic highway or scenic highway corridor as designated by the County or State or found eligible by the County or State. There is one State Eligible Scenic Highway in Elsinore Valley: State Route 74 as it connects with Interstate 215 in the southern portion of the Elsinore Valley. State Route 74 is of regional significance because it provides a link between Orange and Riverside Counties through the Santa Ana Mountains and eventually through the San Jacinto Mountains as the famous Palms to Pines Scenic Highway. The Project Site is approximately 0.75 mile to the east of State Route 74 and cannot be viewed from State Route 74; the Project Site is not located in any scenic corridor or scenic highway. Therefore, there would be no impacts.

b) The Project would develop approximately 46.4 acres of the total approximately 85 acres that is currently undeveloped land that has native shrubs, grasses, rock outcroppings, rolling hills and some trees. The Project would develop the 46.39 acres with a cemetery

that is designed to primarily follow the existing topography, while grading some slopes to support the interior roadways and slopes. While the Project would change the visual character of the vicinity with private interior roadways and some irrigated trees along the roads and pathways, it would not substantially degrade the existing visual character or create an aesthetically offensive site open to public view of the area and its surroundings because the cemetery plots would follow existing elevation of the relatively flat grades. Some of the facilities may be visible, however they are designed in a manner that exceeds setbacks and are surrounded by trees that would allow the facilities to blend into the overall landscape. Architectural renderings of the Project are provided in Figures 6A, 6B and 6C. Impacts would be less than significant, and no mitigation measures are required.

c) The Project Site is within a rural area and is designed to be consistent with the rural residential nature of the area. Sensitive receptors would include the pocket of existing rural residential that exists to the west of the Project Site.

The building would be set back from adjacent streets and would not encroach into public long-distance views. Parking and landscaping areas would be located in the setback space between roadways and buildings, which would minimize the visual scale of the structures. The areas most visible to the public would be landscaped with 115 new trees.

Areas adjacent to the buildings would be landscaped with trees and a variety of shrubs and ground covers. The layering of landscaping between the proposed building and the surrounding roadways would provide visual depth and distance between the roadways and proposed structures, while functioning as a screen to trailer parking and truck yard.

Therefore, potential impacts associated with scenic quality would be less than significant, and no mitigation would be required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): GIS database, Ord. No. 655 (Regulating Light Pollution)

Findings of Fact:

a) According to GIS database, the Project Site is located approximately 45 miles northwest of the Mt. Palomar Observatory and is located in Zone B of the Mt. Palomar Nighttime Lighting Policy Area. Projects within Zone B must adhere to the lighting requirements specified in Riverside County Ordinance No. 655 for standards that are intended to limit light leakage and spillage that may interfere with the operations of the Mount Palomar Observatory. The Project is designed consistent with County Ordinance No. 655 with pole lights of varying height for parking lot lighting and exterior building downlighting. Therefore, due to distance and lighting design, the Project would not interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655. Impacts will be less than significant.

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

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): On-site Inspection, Project Application Description

Findings of Fact:

a) The Project will create a new source of light from low-level exterior security lighting of the buildings, parking lot lighting, and ground-level landscape lighting around the buildings and parking lot only. The roadways and pathways within the cemetery grounds would contain low level landscape lighting, such as a low-to-the-ground solar light fixture that would light up the edge of the roads. All lighting is designed with downward pointing lighting of a soft color and intensity to ensure safety but not to spill over to adjacent properties. Fixtures with light shields are specified at certain locations per the lighting plan. No lighting will be on during daytime hours. The lower color intensity of the building security lighting and the ground level landscape lighting will not impact localized nighttime views around the building and will not migrate to the night sky because all lights are pointed downward. The Project would therefore create a new source of light but because of shielding and use of low-intensity fixtures, the light would not be so substantial that it would adversely affect day or nighttime views in the area. Impacts will be less than significant.

b) Residences exist along the west side of the Project Site, along Garfield Road, which is the main entrance to the site. All entrance and parking lot lighting will be pointed downward and be of a color intensity that will not be bright or obtrusive to the residences. Parking lot lighting would be designed with light emitting diode (LED) lighting, pointed downward toward the parking lot and/or buildings. A photometric analysis (Figure 7) has been completed that shows that light spill-over from the parking lot lighting would not occur and will be in conformance with County ordinances. Low-level landscape lighting is planned for the interior roadways or pathways to provide safety, although as the facility would not be generally accessible at night. Therefore, the Project would not expose residential property to unacceptable light levels. Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Riverside County General Plan Figure OS-2 "Agricultural Resources," GIS database, Project Application Materials

Findings of Fact:

a) The Project Site is designated by the California Resources Agency Farmland Mapping and Monitoring Program as "Other Land" which is not prime, unique or other important farmland. Due to the designation of Other Land, there will be no conversion of 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. There would be no impacts and no mitigation measures are required.

b) The Project Site is vacant, zoned for rural residential uses and not subject to a Williamson Act contract. Pursuant to California Government Code section 51242, no jurisdiction may contract with respect to the Williamson Act unless the land is devoted to agricultural use and is located within an area designated by a city or county as an agricultural preserve. The Project Site is not within a Riverside County designated Agricultural Preserve as the Project Site is zoned for Rural Residential. Therefore, no impacts associated with existing zoning for agricultural use, or a Williamson Act contract would occur, and no mitigation would be required.

c) Properties within 300 feet of the Proposed Project are either vacant, do not contain active agricultural operations, or are developed with rural single family residential uses. The Project Site is zoned Rural Residential. Ordinance No. 625 "Right-to-Farm" is designed to reduce the County's loss of its agricultural resources by limiting the circumstances under which agricultural operations may be deemed to constitute a nuisance. Ordinance No. 625 provides that "no agricultural activity, operation, or facility, or appurtenances thereof, conducted or maintained for commercial purposes in the unincorporated area of the County, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the same locality, shall be or

become a nuisance, private or public, due to any changed condition in or about the locality, after the same has been in operation for more than three (3) years, if it was not a nuisance at the time it began." There are no active agricultural operations within 300 feet of the Project Site, therefore, Ordinance 625 is not applicable. The Proposed Project would not preclude or deter surrounding properties from conducting agricultural operations as allowed by the zoning. Therefore, impacts will be less than significant and no mitigation would be required.

d) The Project Site is vacant and is not undergoing farming or agricultural activities. The Project Site is zoned for Rural Residential uses. The Proposed Project would construct religious facilities and a cemetery, which is allowed with the current zoning for the site. Therefore, while the Project will involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use, the Project Site is consistent with the zoning and land uses permitted for the Project Site by Riverside County. Therefore, impacts will be less than significant, and no mitigation would be required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5. Forest	☐	☐	☐	☒
a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?				
b) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	☐	☐	☐	☒

Source(s): Riverside County General Plan Figure OS-3a "Forestry Resources Western Riverside County Parks, Forests, and Recreation Areas," Figure OS-3b "Forestry Resources Eastern Riverside County Parks, Forests, and Recreation Areas," Project Application Materials

Findings of Fact:

a) The Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104[g]) because the General Plan identifies that the site is not zoned or used for timber production. The site is not located within forest land. There would be no impacts.

b) The Project would not result in the loss of forest land or conversion of forest land to non-forest use because there is no forest land on the property. There would be no impacts.

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

c) The Project will not involve other changes in the existing environment that could result in conversion of forest land to non-forest use because there is no forest or forest lands on the property. There would be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Riverside County General Plan; Riverside County Climate Action Plan ("CAP"); Air Quality Management Plan (AQMP); California Emissions Estimator Model (CalEEMod) version 2022.1.1.29 outputs (Appendix A).

Findings of Fact:

a) **Less than Significant Impact.** The Project Site is located in the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) has jurisdiction over air quality issues and regulations within the SCAB. The Air Quality Management Plan (AQMP) for the basin establishes a program of rules and regulations administered by SCAQMD to obtain attainment of the state and federal air quality standards. The SCAB is classified as an "extreme" nonattainment area for the 2015 Ozone National Ambient Air Quality Standards (NAAQS). The most recent AQMP (AQMP 2022) was developed to address the requirements for meeting this standard and was adopted by the SCAQMD on December 2, 2022. The 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including transportation control measures developed by the Southern California Association of Governments (SCAG) from the 2020 Regional Transportation Plan/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories. Consistency with the AQMP 2022 for general development projects is determined by demonstrating compliance with local land use plans and/or employment projections.

A project is inconsistent with the AQMP if: (1) it does not conform with the local general plan; or (2) it uses a disproportionately large portion of the forecast growth increment. The AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with

reference to local general plans. The Project Site lies within the Elsinore Area Plan (ELAP). The Land Use of the parcels range from Rural Mountainous (RM) with a General Plan Foundation Component of Rural and a Land Use of Very Low Density Residential (VLDR) with a General Plan Foundation Component of Community Development. The Project Site is located within the unincorporated community of Meadowbrook, which is characterized by very low-density residential development. The Proposed Project is not growth inducing and therefore, approval of the Proposed Project would not conflict with the AQMP. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

b) **Less than Significant Impact.** The Proposed Project's construction and operational emissions were screened using California Emissions Estimator Model (CalEEMod) version 2022.1.1.29 prepared by the SCAQMD (available at County office for review). CalEEMod was used to estimate the on-site and off-site construction emissions. The emissions incorporate Rule 402 and 403 by default as required during construction. The criteria pollutants screened for include reactive organic gases (ROG), nitrous oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO2), and particulates (PM_{10} and $PM_{2.5}$). Two of the analyzed pollutants, ROG and NOx, are ozone precursors. Both summer and winter season emission levels were estimated.

Construction Source Emissions

Construction activities associated with the Proposed Project would have the potential to generate air emissions and odor impacts. Construction emissions are considered short-term, temporary emissions and were modeled with the following construction parameters: site grading (mass and fine grading), building construction, paving, and architectural coating. The grading phase of the Proposed Project is anticipated to include 104,500 net cubic yards being graded over three phases (30,500 cubic yards Phase 2 and 74,000 cubic yards Phase 3) of imported material. Material import was phased in within the model. During earthwork activities the applicant will be required to water active sites at least three times daily to reduce impacts to sensitive receptors. Refer to **Table 2: *Construction Emissions*** (Pounds per Day) for construction emissions generated per phase with watering activities three times per day.

Table 2: Construction Emissions
(Pounds per Day)

Phase I						
Source/Phase	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Demolition	2.6	23.7	22.0	<0.0	1.1	0.9
Site Preparation	3.5	32.7	32.2	<0.0	6.6	3.9
Hauling	0.0	0.0	0.0	0.0	0.0	0.0
Grading	1.9	17.4	19.9	<0.0	2.7	1.6
Building Construction	2.7	24.4	31.1	<0.0	1.2	1.0
Paving	1.2	7.6	11.4	<0.0	0.5	0.3
Architectural Coating	10.7	0.9	1.3	<0.0	<0.0	<0.0
Highest Value	**10.7**	**32.7**	**32.2**	**0.0**	**6.6**	**3.9**
SCAQMD Threshold	75	100	550	150	150	55
Significant	**No**	**No**	**No**	**No**	**No**	**No**

Phase II						
Source/Phase	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Demolition	2.5	22.1	21.0	<0.0	1.0	0.9
Site Preparation	3.3	30.2	30.7	<0.0	6.7	3.9
Hauling	0.2	14.2	3.9	0.2	3.7	1.2
Grading	1.8	16.8	19.5	<0.0	3.0	1.7
Building Construction	2.5	22.9	30.2	<0.0	0.9	0.8
Paving	1.2	7.4	11.4	<0.0	0.5	0.3
Architectural Coating	0.1	0.9	1.2	<0.0	<0.0	<0.0
Highest Value	**3.3**	**30.2**	**30.7**	**0.2**	**6.7**	**3.9**
SCAQMD Threshold	75	100	550	150	150	55
Significant	**No**	**No**	**No**	**No**	**No**	**No**
Phase III						
Source/Phase	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Demolition	2.4	21.2	20.5	<0.0	1.0	0.8
Site Preparation	3.2	28.9	30.1	<0.0	6.6	3.8
Hauling	0.5	33.4	8.3	0.2	8.9	2.9
Grading	1.8	15.2	19.1	<0.0	2.8	1.6
Building Construction	2.5	21.4	30.0	<0.0	0.8	0.7
Paving	1.1	7.1	11.2	<0.0	0.4	0.3
Architectural Coating	0.1	0.8	1.2	<0.0	<0.0	<0.0
Highest Value	**3.2**	**33.4**	**30.1**	**0.2**	**8.9**	**3.8**
SCAQMD Threshold	75	100	550	150	150	55
Significant	**No**	**No**	**No**	**No**	**No**	**No**

As shown in Table 2, none of the Proposed Project's construction emissions would exceed regional thresholds. Impacts would be less than significant, and no mitigation measures would be required.

Compliance with SCAQMD Rules and Regulations

During construction and operation, the Proposed Project must comply with applicable rules and regulations even if the Project does not exceed thresholds. The following are rules the Project may be required to comply with, either directly, or indirectly would include but not be limited to the following, and the Project would follow the most recent versions of these rules:

SCAQMD Rule 402
Prohibits a person from discharging 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.

SCAQMD Rule 403
Governs emissions of fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping

loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

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 emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Applicable dust suppression techniques from Rule 403 are summarized below. Implementation of these dust suppression techniques can reduce the fugitive dust generation (and thus the PM_{10} component). Compliance with these rules would reduce impacts on nearby sensitive receptors. Rule 403 measures may include but are not limited to the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least three times daily. (Locations where grading is to occur will be thoroughly watered prior to earthmoving.)
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.
- Suspension of all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Bumper strips or similar best management practices shall be provided where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Replanting disturbed areas as soon as practical.
- During all construction activities, construction contractors shall sweep on-site and off-site streets if silt is carried to adjacent public thoroughfares, to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

SCAQMD Rule 481
Applies to all spray painting and spray coating operations and equipment. The rule states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

1. The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300 feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.

2. Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.
3. An alternative method of coating application or control is used which has effectiveness equal to or greater than the equipment specified in the rule.

SCAQMD Rule 1108
Governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the South Coast Air Basin. This rule would regulate the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the project must comply with SCAQMD Rule 1108.

SCAQMD Rule 1113
Governs the sale, use, and manufacturing of architectural coating and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available during construction. Therefore, all paints and solvents used during construction and operation of the project must comply with SCAQMD Rule 1113.

SCAQMD Rule 1143
Governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

SCAQMD Rule 1186
Limits the presence of fugitive dust on paved and unpaved roads and sets certification protocols and requirements for street sweepers that are under contract to provide sweeping services to any federal, state, county, agency or special district such as water, air, sanitation, transit, or school district.

SCAQMD Rule 1303
Governs the permitting of re-located or new major emission sources, requiring Best Available Control Measures and setting significance limits for PM_{10} among other pollutants.

SCAQMD Rule 1401
New Source Review of Toxic Air Contaminants specifies limits for maximum individual cancer risk, cancer burden, and non-cancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units, which emit toxic air contaminants.

SCAQMD Rule 1403
Asbestos Emissions from Demolition/Renovation Activities, specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).

SCAQMD Rule 2202
On-Road Motor Vehicle Mitigation Options, is to provide employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and state Clean Air Act requirements, Health & Safety Code Section 40458, and Section 182(d)(1)(B) of the federal Clean Air Act. It applies to any employer who employs 250 or more

employees on a full or part-time basis at a worksite for a consecutive six-month period calculated as a monthly average.

Compliance with these regulations would minimize air quality operational impacts.

Operational Emissions

The operation of the Proposed Project would result in a long-term increase in air quality emissions. This increase would be due to emissions from the Project-generated vehicle trips and operational emissions from the on-going use of the Proposed Project. Operational emissions are categorized as energy (generation and distribution of energy to the end use), area (operational use of the project), and mobile (vehicle trips). Operational emissions were estimated using the CalEEMod version 2022.1 defaults values for Place of Worship (Cemetery), City Park (open spaces), and Single-Family Residence (caretaker residence). The Project is assumed to generate up to 46 trips per day (applicant anticipated 39 daily trips at year 30 buildout). The use of a backhoe and miscellaneous pieces of construction handling equipment was also added to operational use. Cemetery uses include approximately 18,667 square feet of chapel, CCF, caretaker, and equipment shed. Proposed Project emissions are listed in **Table 3: *Operational Emissions Summary (Pounds Per Day)***, which represent summer and winter operational emissions.

Table 3: Operational Emissions Summary (Pounds Per Day)

Summer						
Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Summer Max	0.8	0.4	2.5	<0.0	0.4	0.1
Construction Equipment	0.7	3.8	4.9	<0.0	0.1	0.1
Totals	**1.5**	**4.2**	**7.4**	**<0.0**	**0.5**	**0.2**
SCAQMD Threshold	55	55	550	150	150	55
Significant	**No**	**No**	**No**	**No**	**No**	**No**
Winter						
Winter Max	0.7	0.4	1.5	<0.0	0.3	0.1
Construction Equipment	0.7	3.8	4.9	<0.0	0.1	0.1
Totals	**1.4**	**4.2**	**6.4**	**<0.0**	**0.4**	**0.2**
SCAQMD Threshold	55	55	550	150	150	55
Significant	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod 2022; SCAQMD Emission Factors for construction equipment 2025.

As shown, both summer and winter season operational emissions are below SCAQMD thresholds. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) **Less than Significant Impact.** SCAQMD has developed a methodology to assess the localized impacts of emissions from a Proposed Project as outlined within the Final Localized Significance Threshold (LST) Methodology report; completed in June 2003 and revised in July

2008. The use of LSTs is voluntary, to be implemented at the discretion of local public agencies acting as a lead agency pursuant to CEQA. LSTs apply to projects that must undergo CEQA or the National Environmental Policy Act (NEPA) and are five acres or less. LST methodology is incorporated to represent worst-case scenario emissions thresholds. CalEEMod was used to estimate the on-site and off-site construction emissions. The LSTs were developed to analyze the significance of potential air quality impacts of a project to sensitive receptors (i.e. schools, single family residences, etc.) and provide screening tables for small projects (one, two, or five acres). Projects are evaluated based on geographic location and distance from the sensitive receptor (25, 50, 100, 200, or 500 meters from the site).

For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, convalescent facility or anywhere that it is possible for an individual to remain for 24 hours. Additionally, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors. Commercial and industrial facilities are not included in the definition of sensitive receptor because employees do not typically remain on-site for a full 24 hours, but are usually present for shorter periods of time, such as eight hours.

The Project Site is approximately 30 acres and therefore the "5-acre" LSTs were utilized for the analysis to represent a worst-case scenario as the larger the site, the higher the screening threshold. The closest sensitive receptors are residences immediately adjacent to the south of the Site (approximately 500 feet) and to the west of the site (approximately 150 feet); therefore, LSTs are based on a 25-meter (82 feet) distance. The Proposed Project's construction and operational emissions with the appropriate LST are presented in **Table 4 – *Localized Significance Thresholds (pounds per day).***

Table 4: Localized Significance Thresholds (pounds per day)

Phase I						
Source	**NO_x**	**CO**	**PM_{10}**		**$PM_{2.5}$**	
Construction Emissions (Max. from Table 1)	32.7	32.2	6.6		3.9	
Operational Emissions (Max. Total from Table 2)	4.2	7.4	0.5		0.2	
Highest Value (lbs/day)	**32.7**	**32.2**	**6.6**	**0.5**	**3.9**	**0.2**
LST Threshold	371	1,965	13*	8†	4*	2†
Greater Than Threshold	**No**	**No**	**No**	**No**	**No**	**No**
Phase II						
Source	**NO_x**	**CO**	**PM_{10}**		**$PM_{2.5}$**	
Construction Emissions (Max. from Table 1)	30.2	30.7	6.7		3.9	
Operational Emissions (Max. Total from Table 2)	4.2	7.4	0.5		0.2	
Highest Value (lbs/day)	**30.2**	**30.7**	**6.7**	**0.5**	**3.9**	**0.2**
LST Threshold	371	1,965	13*	8†	4*	2†
Greater Than Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Phase III						
Source	**NO_x**	**CO**	**PM_{10}**		**$PM_{2.5}$**	
Construction Emissions (Max. from Table 1)	33.4	30.1	8.9		3.8	
Operational Emissions (Max. Total from Table 2)	4.2	7.4	0.5		0.2	
Highest Value (lbs/day)	**33.4**	**30.1**	**8.9**	**0.5**	**3.8**	**0.2**
LST Threshold	371	1,965	13*	8†	4*	2†
Greater Than Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Sources: CalEEMod.2022 Summer and Winter Emissions; SCAQMD Final Localized Significance Threshold Methodology; SCAQMD Mass Rate Look-up Tables for a 5-acre site in SRA No. 25 Lake Elsinore, distance of 25 meters.
Note: PM10 and PM2.5 emissions are separated into construction and operational thresholds in accordance with the SCAQMD Mass Rate LST Look-up Tables.
* Construction emissions LST
† Operational emissions LST

During earthwork activities the applicant will be required to water active sites at least three times daily, which is a common compliance measure for dust control under SCAQMD regulations. As shown in Table 4, the Proposed Project's localized emissions are not anticipated to exceed Localized Significance Thresholds. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

d) **Less than Significant Impact.** Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature, and the odor emissions are expected to cease upon the drying or hardening of the odor-producing materials. Due to the short-term nature and limited amounts of odor- producing materials being utilized, no significant impact related to odors would occur during construction of the Proposed Project.

Once developed, the operational use of the Cemetery is not expected to create odors. Therefore, less than significant impact from operational odors would occur and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

BIOLOGICAL RESOURCES Would the project:				
7. Wildlife & Vegetation a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?	☐	☒	☐	☐
b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California	☐	☒	☐	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?				
c) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	☐	☐	☐	☒
f) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

Source(s): GIS database, WRCMSHCP and/or CVMSHCP, On-site Inspection; Report by ELMT Consulting titled *Crescent Cemetery, Conditional Use Permit CUP 230002, Habitat Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis,* March 2024 (Appendix B-1); Report by ELMT Consulting titled *Crescent Cemetery, Conditional Use Permit CUP 230002, Delineation of State and Federal Jurisdictional Waters,* March 2024 (Appendix B-2); Report by ELMT Consulting titled *Determination of Biologically Equivalent or Superior Preservation Report, Crescent Garden Cemetery,* July 2024, updated October 2024 (Appendix B-3); Report by Huffman Environmental titled *2024 Proposed Crescent Gardens Cemetery Project Crotch's Bumble Bee Summary Report, Riverside County, California*, August 2024 (Appendix B-4); Report by ELMT Consulting titled *Crotch's Bumblebee (Bombus crotchii) Suitability Assessment for the Proposed Crescent Cemetery Project Located in Unincorporated Riverside County, California*, April 7, 2025 (Appendix B-5).

Findings of Fact:

a) The property is located in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Elsinore Area Plan. The Project was evaluated for consistency with MSHCP as follows:

Criteria Cell Location. The Project Site does not occur within one of the Criteria Cells of the MSHCP, which were established for the acquisition of habitat and sensitive plant and wildlife species and therefore is not subject to MSHCP's Habitat Evaluation and Acquisition Negotiation Strategy (HANS) process or the Joint Project Review (JPR) process.

Section 6.1.2 - Riverine/Riparian Resources. The biological report included in Appendix B-1 identified that one unnamed drainage feature (Drainage 1) was observed within the boundaries of the Project Site at the time of the investigation that will qualify as riparian/riverine habitat under the MSHCP. The limits of disturbance for the proposed project were purposefully designed to avoid impacts to the greatest extent possible; however, a small portion of Drainage 1 will be impacted from Project implementation. As required by the MSHCP, a Determination of Biologically Equivalent or Superior Preservation Analysis (DBESP) analysis must be conducted to address any impacts to riparian/riverine habitat. The objective of the DBESP is to demonstrate that proposed mitigation would provide an equivalent or superior preservation of habitat function and value of riparian/riverine resources. The factors to be considered in analyzing the function and value include hydrologic regime, flood storage and flood flow modification, nutrient retention and transformation, sediment trapping and transport, toxicant trapping, public use, wildlife habitat, and aquatic habitat.

The DBESP (Appendix B-3), which was reviewed by the Riverside Conservation Authority (RCA) on September 17, 2024. The RCA identified that mitigation was required to mitigate the potential impacts to riverine/riparian resources. The DBESP in Appendix B-3 was revised in October 2024 to reflect the required mitigation. The mitigation identified in the DBESP is reflected in **Mitigation Measure BIO-1** and is designed to off-set impacts to 0.036 acre of riparian/riverine habitat to install a drainage culvert to support an interior roadway. Refer to "Mitigation" at the end of this section for the full mitigation measure language. Refer to **Figure 11: *DBESP and Crotch Bumble Mitigation Area***, located at the end of this section, for the location of the DBESP mitigation area.

Section 6.1.4 – Urban/Wildland Interface. The Urban/Wildlife Interface Guidelines are intended to ensure that indirect project-related impacts to the MSHCP Conservation Area, including drainage, toxics, lighting, noise, invasive plant species, barriers, and grading/land development, are avoided or minimized. The project site is not located within any Criteria Cells or designated conservation areas. However, the northern portion of the site does occur adjacent to mapped MSHCP Conserved Public/Quasi-Public Land (PQP) within APN 3491-700-02 (refer to Exhibit 9 in Appendix B-1); however, this parcel does not occur within any Criteria Cells and is not documented as contributing to nearby Linkages. The Riverside County Building and Safety will require review of the lighting plans to ensure that the proposed on-site lighting sources would meet County lighting standards. Construction and operational noise were assessed in Appendix G. Operational noise was determined to be below the County's standard for daytime noise standards throughout the life of the Project. Construction would occur during the permitted hours outlined in County of Riverside Municipal Code Section 9.52.020, and therefore would be in compliance with the County's noise ordinance during construction. The Project would be conditioned to meet all applicable County noise policies. Overall, the analyses provided found the Project consistent with MSHCP Section 6.1.4.

Section 6.3.2 – Additional Surveys. The Project Site is not located within plan-defined areas requiring surveys for narrow endemic plant species or criteria area plant species. However, the Project is located within a designated area, requiring surveys for burrowing owl (BUOW). A habitat assessment was prepared in November 2023 which determined the potential suitable foraging habitat for burrowing owl, but less favorable conditions for colonization opportunities. Four focused burrowing owl surveys were conducted in 2024, on May 10 and 31 and June 14 and June 28, in accordance with the MSHCP Burrowing Owl Survey Instructions (2006)(refer to Appendix B-3). The result was that no burrowing owls were found. However, because

suitable habitat exists on site and construction would occur over time, **Mitigation Measure BIO-2** to conduct a pre-construction survey for burrowing owl during each phase of construction to avoid impacts to the burrowing owl. The mitigation measure also identifies that relocation may occur under certain conditions to avoid impacts during construction. Refer to "Mitigation" at the end of this section for details.

Impacts would be less than significant with the incorporated mitigation.

b) A literature review and field assessment were performed to document baseline conditions and assess the potential for special status plants and wildlife species to occur within the Project Site. Special attention was given to the suitability of on-site habitat to support special status species as identified by the California Department of Fish and Wildlife (CDFW) and other electronic databases utilized for the assessment (Appendix B-1).

According to the CNDDB, seventy-five (75) special-status wildlife species have been reported in the Lake Elsinore and Romoland quadrangles (refer to Appendix B-1). Three special-status wildlife species were observed on-site during the field investigation: orange-throat whiptail (CDFW Watch List), loggerhead shrike (CDFW Species of Special Concern), and coastal California gnatcatcher (Federally Threatened, CDFW Species of Special Concern). These species are covered under the MSHCP.

Crotch's Bumble Bee

The Crotch's bumblebee (*Bombus crotchii*, CBB), is a candidate species for State listing and is not covered under the MSHCP. CBB surveys were conducted on the Project site and included a habitat assessment to identify optimal nectar sources, as well as focused species surveys to determine the presence or absence, with the survey methodology following the 2023 CDFW guidance document for the CBB. (Appendix B-4).

The habitat assessment identified that of the approximately 85-acre Project Site, approximately 34 acres contained potentially suitable habitat. Of the 34 acres, approximately 15.07 would be developed as follows: Phase 1: 1.67 acres; Phase 2: 10.61 acres; Phase 3: 2.79 acres.

Three presence/absence surveys rounds were conducted on June 6, June 26, and July 6, 2024 during CBB's peak Colony Active Period in areas determined as optimal nectar sources. Efforts were made to survey during the most active flight and peak blooming periods of potential nectar and pollen sources. Out of three survey rounds, a total of one CBB was observed within the delineated survey area during the first survey (June 6, 2024). The species was observed in the area east of the CCF, within an area that would not be developed and where most of the habitat would not be disturbed by the Project (Refer to Figure 11 located at the end of this section). The CBB was not identified in the remaining two surveys. **Mitigation Measure BIO-3** would be implemented and is designed to avoid and minimize potential impacts to CBB.

Subsequent to the presence/absence surveys, a desktop habitat assessment was conducted to determine the Project Site's habitat quality for nectar, overwintering and nesting (Appendix B-5). The study identified that, overall, while the entire 85.3 acre site provides some level of nectar, overwintering and burrowing habitat, the total of 57 acres (including roads) impacted

by the Project allows for nearly half of the Project Site to remain undisturbed for the CBB (refer to Tables 2 and 3 in Appendix B-5).

Burrowing Owl

On October 10, 2024, the California Fish and Game Commission (CFGC) approved a petition to proceed with candidacy to list the western burrowing owl (*Athene cunicularia*) as a candidate protected species under the California Endangered Species Act (CESA). The BUOW is one of 146 species that are also afforded protection under the MSHCP. Mitigation Measure BIO-2 would be implemented and is designed to avoid and minimize potential impacts to burrowing owl.

Overall, the Project would not have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12) with the incorporated mitigation.

c) The Project Site contains suitable habitat for BUOW, identified by the CDFW as a candidate protected species under California ESA and identified in the MSHCP. Mitigation Measure BIO-2 would be implemented and is designed to avoid and minimize potential impacts to burrowing owl. The Project Site also contains suitable habitat and one occurrence of CBB, which is also a candidate protected species under the California ESA. Mitigation Measure BIO-3 would be implemented and is designed to avoid and minimize potential impacts to CBB.

The Project Site and immediate surrounding areas also contain habitat suitable for nesting birds in general, including the shrubs on site, and nesting birds are protected under the Migratory Bird Treaty Act (MBTA) of 1918. The MBTA provides protection for nesting birds that are both residents and migrants whether or not they are considered sensitive by resource agencies. The MBTA makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed under 50 CFR 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). The direct injury or death of a migratory bird, due to construction activities or other construction-related disturbance that causes nest abandonment, nestling abandonment, or forced fledging would be considered take under federal law. The U.S. Fish and Wildlife Service (USFWS), in coordination with the CDFW administers the MBTA. CDFW's authoritative nexus to MBTA is provided in FGC Sections 3503.5 which protects all birds of prey and their nests and FGC Section 3800 which protects all non-game birds that occur naturally in the State.

To ensure potential impacts to nesting birds are avoided or minimized during construction of the remaining Project Site, **Mitigation Measure BIO-4** to conduct a pre-construction survey for nesting birds and establishment of no-work buffers during construction is required to ensure birds and their nests are not disturbed during construction. Refer to "Mitigation" at the end of this section for details.

Impacts would be less than significant with the incorporated mitigation.

d) There are no native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or native wildlife nursery sites on the Project Site according to surveys conducted (Appendix B-1). The Project Site was not identified as occurring in a wildlife

corridor or linkage or wildlife nursery site(s). The Proposed Project will be confined to existing areas that have been heavily disturbed or developed, are isolated from regional wildlife corridors and linkages, and there are no riparian corridors, creeks, or useful patches of stepping stone habitat (natural areas) within or connecting the improvement areas to a recognized wildlife corridor or linkage.

Impacts would be less than significant.

e) Refer to item a) above. Impacts would be less than significant with the incorporation of Mitigation Measure BIO-1.

f) The biological survey identified that there are no State or federally protected wetlands (including, but not limited to, vernal pools, marsh, coastal, etc.) on the Project Site. However, the Project Site was determined to contain 33 road rut/small depressional areas that pond seasonally. Vernal pools are seasonally inundated, ponded areas that only form in regions where specialized soil and climatic conditions exist. During fall and winter rains typical of Mediterranean climates, water collects in shallow depressions where downward percolation of water is prevented by the presence of a hard pan or clay pan layer (duripan) below the soil surface. Although 33 road rut/small depressional areas exhibit hydrology, the features are compacted and lack hydric soils, and the features do not support any vegetation. As a result, these features are not MSHCP vernal pools because they lack two of the parameters needed to be considered as a depressional wetland.

There are three species of fairy shrimp with the potential to occur on-site: vernal pool fairy shrimp (*Branchinecta lynchi*), Riverside fairy shrimp (*Streptocephalus woottoni*), and versatile fairy shrimp (*Branchinecta lindahli*) (Appendix B-3). Vernal pool fairy shrimp are federally listed as threatened, and Riverside fairy shrimp are federally listed as endangered, whereas the versatile fairy shrimp is relatively common and is not listed or considered sensitive. Vernal pool fairy shrimp have the widest geographic range of the federally listed vernal pool crustaceans and occur from southern Oregon to northern and central California, generally west of the Sierra Nevada, to southern California. The species' range extends south to Orange and Los Angeles counties and east to western Riverside County but is generally absent from San Diego County. Vernal pool fairy shrimp are found in vernal pools and other vernal pool-like habitats such as ephemeral ponds or features that can be formed from anthropogenic events such as tire ruts. Riverside fairy shrimp can be found in Riverside, Orange, and San Diego counties and occur in vernal pools and other ephemeral features with long inundation times. The versatile fairy shrimp is common in pools throughout California .and can co-occur with both vernal pool and Riverside fairy shrimp.

The road rut/small depressional features were surveyed for fairy shrimp according to the USFWS protocol in the dry season of 2023 and the wet season of 2023/2024 (refer to Appendix B-3), with follow-up surveys conducted in the dry season of 2024 for pools discovered during the wet season of 2023/2024. The results indicated that no listed or sensitive fairy shrimp occurred within any of the depressional features.

Impacts would be less than significant.

g) Aside from the MSHCP, the only other local policies/ordinances protecting biological resources within the Project area are the Riverside County Oak Tree Management Guidelines and the

Stephens' Kangaroo Rat (SKR) Impact Fee Area. There are no oak trees on the Project Site that would be removed as a result of the Project, therefore, this guideline is not applicable.

The Project Site is located within the Mitigation Fee Area of the SKR Habitat Conservation Plan. Therefore, the Applicant will be required to pay the SKR HCP Mitigation Fee prior to development of the Project Site.

Impacts would be less than significant.

Mitigation: The following mitigation measures are required:

BIO – 1 **Riverine/Riparian Habitat:** Mitigation for the loss of 0.036-acre of riparian/riverine habitat within Drainage 1 would occur as a conservation easement to be placed over the 0.894 acre remainder of Drainage 1 as identified in the DBESP. A Habitat Mitigation Monitoring and Reporting Program (HMMP) must be submitted to Riverside County Planning for review. The HMMP would identify how the applicant would maintain and manage the 0.894 acre area. Activities may include but not be limited to removal of extensive invasive species, such as Tree of Heaven throughout the 0.894 acre area. Work can be performed by a third-party or by trained maintenance staff with the oversight of a biologist.

BIO – 2 **BUOW Avoidance and Minimization:** A preconstruction survey shall be conducted within 30 days prior to ground disturbance to avoid direct take of burrowing owls. If burrowing owls are found to be present or nesting on-site during the preconstruction survey, then the following recommendations must be adhered to: Exclusion and relocation activities may not occur during the breeding season, which is defined as March 1 through August 31, with the following exception: From March 1 through March 15 and from August 1 through August 31 exclusion and relocation activities may take place if it is proven to the County and appropriate regulatory agencies (if any) that egg laying or chick rearing is not taking place. Any relocation activities cannot occur without first consulting with the CDFW, and any relocation would be conducted in accordance with the conditions set forth by the CDFW. The pre-construction survey must be conducted by a qualified biologist; any relocation activities would be undertaken by a qualified biologist as approved by the CDFW.

BIO-3 **Crotch's Bumble Bee:** The Project will occur in phases, and this measure will apply to each phase. If the Crotch's bumble bee is no longer a candidate or listed species under the California ESA at the time ground-disturbing activities, then no additional protection measures are proposed for this species.

The Project Proponent shall not undertake Project activities within suitable habitat until appropriate authorization (i.e., California Endangered Species Act (CESA) Incidental Take Permit (ITP) under Fish and Game Code §2081) is obtained. The ITP for Phase 1 will include but not be limited to mitigation for 1.67 acres of habitat loss which may include but not be limited to 0.45 acre of suitable habitat that is located within the 0.89 acre area conserved under BIO-1. Additional acreage may be required in accordance with the ITP.

This measure does not apply to work occurring in habitat that is not suitable for the species in any phase.

BIO-4 **Migratory Bird Avoidance and Minimization.** Bird nesting season generally extends from February 1 through September 15 in southern California and specifically, April 15 through August 31 for migratory passerine birds. To avoid impacts to nesting birds (common and special status) during the nesting season, a qualified Avian Biologist shall conduct pre-construction Nesting Bird Surveys (NBS) at least three (3) days prior to project-related disturbance to nestable vegetation to identify any active nests. If no active nests are found, no further action is required. If an active nest is found, the qualified Avian Biologist shall set appropriate no-work buffers around the nest which will be based upon the nesting species, based on the individual species type, its sensitivity to disturbance, nesting stage and expected types of nest, and the intensity and duration of disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.

Monitoring: Qualified biologists will conduct the pre-construction surveys as identified in the mitigation measures.

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

Figure 11 – DBESP and Crotch Bumble Mitigation Area

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
CULTURAL RESOURCES Would the project:				
8. Historic Resources a) Alter or destroy a historic site?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☒	☐	☐

Source(s): On-site Inspection, Project Application Materials; Report by CRM Tech, titled *Historical/Archaeological Resources Survey Report, Crescent Garden Mortuary and Cemetery Project*, , December 14, 2023, revised June 23, 2024; (Appendix C-1, on file with the County); Report by Helix Environmental Planning, titled *Crescent Gardens Cemetery, Cultural Resources Phase II Testing Report, PDA8402/CUP230002*, July 2024 (Appendix C-2, on file with the County).

Findings of Fact:

a) The Historical/Archaeological Resources report prepared for the Project identified that within the Project footprint existed five historic prospecting pits (sites 3719-03H and 3719-13H to -16H), two sets of historic-era structural remains (3719-01H and -02H), and a historic-era refuse scatter (3719-12H). Four of the prospecting pits (3719-03H and 3719-14H to -16H) were recommended as not significant based on the results of the Phase I study. A Phase II study was performed at the two sets of historic-era structural remains (3719-01H and -02H), the historic-era refuse scatter (3719-12H) and prospecting pit 3719-13H to further identify the significance of these sites. As a result of this testing program, which consisted of an intensive resurvey of each of the four resources and the collection of surficial historic-era artifacts, as well as expanded archival research, the Phase II report concluded that each resource was not eligible for listing on the National Register of Historic Places (NHRP) or the California Register of Historical Resources (CRHR). Based on this, the project will not have significant effects to these historic period resources. However, given the potential to encounter subsurface historical features **Mitigation Measure 60-Planning-CUL-2** and **70-Planning CUL-2** that requires inadvertent discovery of historical artifacts be evaluated by a project archaeologist and identifies the disposition of potential artifacts. With the implementation of the mitigation measure, impacts would be less than significant.

b) Public Resources Code Section 15064.5(a) defines historical resources, which includes: *A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 14 CCR, Section 4850 et seq.)*. Based on the Phase 1 and Phase II cultural resources reports, there are no historical resources that are considered eligible to the California Register of Historical Resources. Implementation of Conditions of Approval would ensure that potential impacts to unanticipated resources that may be found to be eligible would be avoided or minimized.

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

Mitigation: The following mitigation measures are required:

60. Prior to Grading Permit Issuance

60-Planning-CUL. 2 Inadvertent Discoveries: Historic Period Cultural Resources. If previously unknown historic-period cultural resources are discovered on the project site, work shall be temporarily halted within 60 feet of the discovery, and the resources shall be evaluated by the Project Archaeologist and the Consulting Tribes in consultation with County staff. If historic archaeological material associated with the previously identified historic-period archaeological sites is encountered, cultural features will be documented, and diagnostic artifacts will be collected before ground-disturbing activities resume within 60 feet of the discoveries. This language shall be included in the Cultural Resources Monitoring Plan.

70. Prior To Grading Final Inspection

70-Planning-CUL. 2 Artifact Disposition: Historic Resources: Prior to Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery.

Historic Resources- all historic archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines.

The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County.

Monitoring: Monitoring required as identified in the mitigation measures above.

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

Source(s): On-Site Inspection, Project Application Materials; Report by Report by CRM Tech, titled *Historical/Archaeological Resources Survey Report, Crescent Garden Mortuary and Cemetery Project*, December 14, 2023, revised June 23, 2024 (Appendix C, on file with the County); Report by Helix

Environmental Planning, titled *Crescent Gardens Cemetery, Cultural Resources Phase II Testing Report, PDA8402/CUP230002*, July 2024 (Appendix C, on file with the County),

a) The Phase 1 and Phase II cultural resources reports identified that a large Luiseño "village" with bedrock mortars and metates, a "vast" midden deposit, cupule rocks and pictographs encompasses much of the northern portion of the Project area, and extends outside the Project to the north. This site has been recorded as P-33-000710 (CA-RIV-710). Given the significance of this resource, the Project is designed to minimize and avoid the cultural resource site through preservation of portions of the site in open space and use engineered fill in other areas, so that the Project grave sites would be placed in the fill, and not below ground where these resources exist. Implementation of the **Mitigation Measures, as identified below**, which require monitoring and reporting by a qualified archaeologist and tribal representatives would minimize potential impacts are required to reduce impacts to this resource.

b) Refer to the above. The Phase II report also identified that while P-33-000710 (CA-RIV-710) has not been formally evaluated for the NRHP or the CRHR, it is known to contain cultural features and deposits of both cultural and tribal importance and scientific/ archaeological importance. Therefore, this resource is treated as potentially eligible for the purpose of this Project. Implementation of the Mitigation Measures as identified above would reduce impacts to less than significant.

c) Refer to the above.

Mitigation: The following mitigation measures are required:

60. Prior to Grading Permit Issuance

60-Planning-CUL. 1 ECS Sheet Resource Reburial Area. Prior to issuance of grading permits: the developer/ applicant shall provide evidence to the Riverside County Planning Department that an Environmental Constraints Sheet has been included in the Grading Plans. This sheet shall indicate an area that will be used for reburial of any artifacts that have been identified during grading and cannot be avoided. This area will be protected and not disturbed in the future. This is confidential information, and the exact nature of this area will not be called out on the grading plans.

60-Planning-CUL. 3 Inadvertent Finds. Avoidance and preservation in place is the preferred method for all Tribal Cultural Resources inadvertently discovered during the course of ground disturbing activities. If avoidance and preservation is not feasible, a feasibility study shall be required for final determination regarding the need for avoidance. If the County determines that the study has adequately demonstrated that preservation is not feasible, a Data Recovery/Treatment Plan for the resource shall be drafted in consultation with the Pechanga Band, and subject to review and approval by the County of Riverside prior to implementation and recommencement of ground disturbing activities.

If Tribal cultural resources are discovered during ground disturbance activities that were not assessed by the archaeological report(s) and/or environmental assessment

conducted prior to Project approval, the following procedures shall be followed. Treatment of tribal cultural resources inadvertently discovered during the project's ground-disturbing activities shall be subject to the consultation process required by state law and AB 52.

i. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the Project Applicant, the Project Archaeologist, the Tribal Representative(s), and the County to discuss the significance of the find.

ii. At the meeting, the significance of the discoveries shall be discussed and after consultation with the Tribal Representative(s) and the Project Archaeologist, a decision shall be made, with the concurrence of the County, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.

iii. Further ground disturbance, including but not limited to grading, trenching etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal Monitors if needed.

iv. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design to the extent feasible, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/Mitigation Measures.

v. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the County for their review and approval prior to implementation of the said plan.

vi. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the Project Applicant and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the County of Riverside for decision. The County shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist, and shall consider the cultural and religious principles and practices of the Tribe. Notwithstanding any other rights available under the law, the decision of the County shall be appealable to the County Planning Commission and Historical Commission.

vii. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment finding.

60-Planning-CUL. 4 Native American Monitor. Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with Pechanga for a Native American Monitor. The Native American Monitor shall be on-site during all ground-disturbing activities for development of the project, including clearing, grubbing, tree removals, grading and trenching, removal of existing structural remains and infrastructure, and over-excavation for Phases 1, 2, and 3 of project development. In conjunction with the Archaeological Monitor, the Native American Monitor 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 condition of approval. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

No monitor will be required post phased development and during the Cemetery operations due to the reasons listed below.

a) The project has been designed to avoid impacts on known significant archaeological/cultural resource (i.e., historical resource per CEQA), P-33-000710 (CA-RIV-710), to the extent feasible.

b) The design features include avoiding bedrock milling features and cupule rocks, and leaving large areas of the archaeological site in undeveloped open space.

c) The project design includes as-needed over-excavation to ensure that all gravesites in the cemetery will have engineered fill or backfill extending to a minimum depth of five (5) feet below finished grade. The planned graves will be dug five (5) feet deep for the burial, per the established Muslim burial customs. Therefore, by having a minimum of five (5) feet of engineered fill, all earthwork during burials will remain within the engineered fill zone, and no natural ground will be disturbed.

60-Planning-CUL. 5 Pre-grade Surface Collection. Prior to the start of any ground-disturbing activity in any phase of the project, the Native American Monitor shall conduct a surface collection of artifacts within that phase that would be subject to impacts from ground disturbance. The artifacts/cultural material will be kept in a secure location on site or temporarily kept by the Monitoring Tribe until such time as they are reburied in a location agreed upon by the Consulting Tribes and the project applicant/developer.

60-Planning-CUL. 6. Project Archaeologist Archaeological Monitor. Prior to issuance of grading permits, the developer/permit applicant shall provide evidence to the County of Riverside Planning Department that a County-certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program for Phases 1, 2, and 3 of project development. The Project Archaeologist, in consultation with the Consulting Tribe(s) shall develop a Cultural Resources Management Plan (CRMP) that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant, as well as address

potential impacts to undiscovered buried archaeological resources associated with this project. The CRMP shall include a Controlled Grading Plan that will identify specific areas of the project site requiring controlled grading and detail the methods for such grading. Controlled grading entails small lifts of soil (3-5 inches), allowing the Native American Monitor and Archaeological Monitor adequate opportunity to examine the ground surface in a more controlled manner than general mass grading. This allows for recording cultural features and artifacts that may be destroyed or overlooked in standard mass grading. Controlled grading will be utilized for soil removals within and adjacent to the mapped boundaries of P-33-000710, in the areas of the historic archaeological sites, and at other areas identified by the Project Archaeologist or the Consulting Tribe(s) as requiring controlled grading. A fully executed copy of the contract and a wet-signed copy of the CRMP shall be provided to the County Archaeologist to ensure compliance with this condition of approval.

Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth-moving activities for project development are observed and shall be on-site during all ground-disturbing activities for the project in areas with the potential to yield archaeological resources (not in formational material), including clearing, grubbing, tree removals, grading and trenching, removal of existing structural remains and infrastructure, and over-excavation for Phases 1, 2, and 3 of project development. In conjunction with the Native American Monitor, the Archaeological Monitor shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

60-Planning -CUL-7 Temporary Construction Fencing. Prior to the start of any ground-disturbing activity, the applicant/developer shall ensure that temporary construction fencing is placed at the edges of the extent of grading and around bedrock milling features and cupule rocks within the development footprint to prevent inadvertent movement of personnel and equipment into the areas of P-33-000710 that will remain in undeveloped open space and to ensure that no removals of bedrock milling features, cupule rocks, and cultural soils or cultural material occur in these areas. A Native American Monitor and an Archaeological Monitor shall observe the placement of fencing, which will be based on a fencing plan to be approved by the County Archaeologist and the Consulting Tribes. No staging of material or equipment shall occur within the fenced areas.

70. Prior To Grading Final Inspection

70-Planning-CUL. 1. Artifact Disposition: Prehistoric Resources. Prior to Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery.

Prehistoric Resources- The following treatment shall be applied.

Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloguing, analysis, and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.

70-Planning-CUL. 3. Phase IV Monitoring Report. Prior to Grading Permit Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground-disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required, as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have been treated in accordance with procedures stipulated in the Cultural Resources Management Plan.

Monitoring: Prior to the issuance of grading permits.

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

Source(s): Riverside County Climate Action Plan (CAP); California Emissions Estimator Model (CalEEMod) version 2022.1.1.21 (Appendix A).

Findings of Fact:

a) **Less than Significant Impact.**

Electricity

The Proposed Project is the development of a Cemetery. Southern California Edison (SCE) currently provides electrical service to the Project area. The demand for electricity associated with the Proposed Project would be for operation of the Cemetery structures (CCF, Chapel, Residence, and Equipment Shed). In 2021, the Commercial sector of the Southern California Edison planning area consumed 5965.998733 GWh of electricity. Based on the CalEEMod

2022.1.1.21 emission output tables for the Proposed Project, the estimated electricity demand is 0.165554 GWH (refer to Appendix A - CalEEMod Data Outputs). The Proposed Project's estimated annual electricity consumption compared to the 2020 annual electricity consumption of the overall Industry Sector in the SCE Planning Area would account for approximately 0.0004590 percent of total electricity consumption. Total electricity demand in SCE's service area is estimated to increase by approximately 12,000 GWh between the years 2015 and 2026. The increase in electricity demand from the Proposed Project is insignificant compared to the projected electricity demand within SCE's service area.

The Proposed Project has been designed to comply with the 2022 Building Energy Efficiency Standards. The County would review and verify that the Proposed Project plans would be in compliance with the most current version of the Building and Energy Efficiency Standards. The Proposed Project would also be required to adhere to CALGreen, which establishes planning and design standards for sustainable developments, and energy efficiency. Adherence to these requirements would result in the Proposed Project being efficient in terms of energy consumption. The development of the Proposed Project is not anticipated to affect achievement of the 60 percent Renewable Portfolio Standard established in in the current SB 100. SCE and other electricity retailer's SB 100 goals include that end-user electricity use such as residential and commercial developments use would decrease from current emission estimates. The Proposed Project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation and no mitigation measures are recommended.

Natural Gas

Southern California Gas Company currently provides natural gas service to the project area. In 2021, the Commercial sector of the Southern California Gas Company planning area consumed 98.293612 million therms of natural gas. Based on the CalEEMod emission output tables for the Proposed Project, the estimated natural gas demand is 7,430.84 therms of natural gas per year. The Proposed Project's estimated annual natural gas consumption compared to the 2020 annual natural gas consumption of the overall Industry Sector in the Southern California Gas Company Planning Area would account for approximately 0.0008308 percent of total natural gas consumption. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

In summary, the construction and operation of the Proposed Project would not result in the inefficient, wasteful, or unnecessary use of energy. Impacts associated with energy use would be less than significant and no mitigation is required.

Fuel

During operations of the Proposed Project, the use of fuel would be generated by maintenance staff and product delivery/pick-up trips. The Proposed Project is not expected to result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. The fuel use related with vehicle trips produced by the Proposed Project would not be considered inefficient, wasteful, or unnecessary. The Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts are less than significant, and no mitigation is recommended.

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

b) **Less than Significant Impact.** Construction of the Proposed Project would be temporary. Limitations on idling of vehicles and equipment, and requirements that equipment be properly maintained would save fuel. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site clearing, grading, paving, and building construction. The County's permissible hours for construction is 7:00 a.m. to 6:00 p.m. on non-holiday weekdays, including Saturdays. As on-site construction activities would be restricted between these hours, it is anticipated that the use of construction lighting would be minimal.

The State's Title 24 energy efficiency standards are widely regarded as the most advanced energy efficiency standards. These standards help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. Policy OS 16.1 of the County General Plan reinforces the implementation and enforcement of the California Code of Regulations (the "California Building Standards Code") particularly Part 6 (the California Energy Code) and Part 11 (the California Green Building Standards Code), as amended and adopted pursuant to County ordinance. The Proposed Project would be required by State law to comply with the Title 24 energy efficiency standards and shall abide by the CAP.

Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Riverside County General Plan Safety Element (adopted September 28, 2021) Figure 1 "Fault Lines," GIS database, California Department of Conservation; Report by Leighton, Inc titled, *Geotechnical Exploration and Infiltration Testing, Proposed Crescent Gardens Cemetery, East of the Intersection of Garfield Street and Roberts Street*, March 11, 2024 (Appendix D-1).

Findings of Fact:

a) The Project Site is located in Southern California, a seismically active area and susceptible to the effects of seismic activity include rupture of earthquake faults. The Project Site is not located on or near an Alquist-Priolo Earthquake fault, according to the geotechnical report in Appendix D-1. The Project Site is located approximately 4.8 miles to the northeast of the Elsinore fault zone and approximately 15.5 miles to the southwest of the San Jacinto fault zone (Appendix D-1). Due to the distance of the Project Site from the closest fault zone, there is a less than significant potential for the Project to be subject to rupture of a known earthquake fault. Impacts would be less than significant, and no mitigation measures are required.

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

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

11. Liquefaction Potential Zone a) Be subject to seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

Source(s): Riverside County General Plan Safety Element (adopted September 28, 2021) Figure 2 "Liquefaction Zones," Report by Leighton, Inc titled, *Geotechnical Exploration and Infiltration Testing, Proposed Crescent Gardens Cemetery, East of the Intersection of Garfield Street and Roberts Street*, March 11, 2024 (Appendix D-1).

Findings of Fact:

Liquefaction occurs when shallow, fine to medium-grained sediments saturated with water are subjected to strong seismic ground shaking. It generally occurs when the underlying water table is 50 feet or less below the surface. The Project Site is identified by the Riverside County General Plan as being in a mapped area with no potential for liquefaction except for the eastern portions of parcels 340-180-016, 340-180-005, and 340-180-002, which are in an area designated as "low potential" for liquefaction. The planned buildings are located on parcels identified by the General Plan as having no potential for liquefaction. The parcels identified by the General Plan has having a "low potential" for liquefaction are identified for cemetery plot use and interior cemetery roadways. Field work conducted did not encounter groundwater during the subsurface investigation (Appendix D-1).

The Riverside County Department of Building and Safety reviews structural plans and geotechnical data prior to issuance of a grading permit and conducts inspections during construction, which would ensure that all required CBC (California Building standards Commission) measures are incorporated. Compliance with the CBC as included as a condition of approval and verified by the County's review process would ensure that impacts related to liquefaction are less than significant.

Impacts would be less than significant, and not mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Riverside County General Plan Safety Element (adopted September 28, 2021) Figure 1 "Fault Lines," GIS database, California Department of Conservation; California Department of Conservation; Report by Leighton, Inc titled, *Geotechnical Exploration and Infiltration Testing, Proposed Crescent Gardens Cemetery, East of the Intersection of Garfield Street and Roberts Street*, March 11, 2024 (Appendix D-1).

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

Findings of Fact:

a) The Project Site is located in Southern California, a seismically active area and susceptible to the effects of seismic activity include rupture of earthquake faults. The Project Site is located approximately 4.8 miles to the northeast of the Elsinore fault zone and approximately 15.5 miles to the southwest of the San Jacinto fault zone (Appendix D-1). The Proposed Project would be designed in accordance with the most current California building codes that are designed to reduce structural impacts from earthquakes. The Riverside County Department of Building and Safety reviews structural plans and geotechnical data prior to issuance of a grading permit and conducts inspections during construction, which would ensure that all required CBC (California Building standards Commission) measures are incorporated. Compliance with the CBC as included as a condition of approval and verified by the County's review process would ensure that impacts related to strong seismic ground shaking are less than significant.

Impacts would be less than significant, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): On-site Inspection, Riverside County General Plan Safety Element (adopted September 28, 2021) Figure 3 "Landslide Risk," Report by Leighton, Inc titled, *Geotechnical Exploration and Infiltration Testing, Proposed Crescent Gardens Cemetery, East of the Intersection of Garfield Street and Roberts Street*, March 11, 2024 (Appendix D-1).

Findings of Fact:

a) *Landslides, Rockfall Hazards.* Landslides are the downhill movement of masses of earth and rock and are often associated with earthquakes; but other factors, such as the slope, moisture content of the soil, composition of the subsurface geology, heavy rains, and improper grading can influence the occurrence of landslides. The Project Site and adjacent parcels range from gentle slopes to relatively flat with rocky outcroppings. Site elevations range from approximately 1,540 to 1,660 feet above mean sea level (amsl). The ELAP Figure 13 *Steep Slopes* identifies that steep slopes are located east of Project area. The site has not been evaluated for seismically induced landslide potential by the State of California. No mapped limits of historic landslides have been mapped by the California Geological Survey on their Landslide Inventory Interactive website. Natural rolling hillsides towards the southeast portion of the development have gradients that are generally 2:1 (horizontal:vertical) or flatter and are composed of very dense shallow bedrock. These slopes are not expected to pose seismically induced landslides hazards (Appendix D-1). Therefore, Because the Project Site and vicinity are relatively flat with rolling hills, impacts

related to landslides or rock falls would not occur from implementation of the Proposed Project. The impact would be less than significant.

Lateral Spreading. Lateral spreading is a type of liquefaction hazard associated with ground failure and/or lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). The geotechnical investigation in Appendix D-1 found that the potential for liquefaction at the Project Site to be very low due to the shallow bedrock present at the site and the absence of liquefaction hazards. Therefore, the Geotechnical Investigation determined that the Project Site is not susceptible to lateral spreading.

Excavation and recompaction would be performed in compliance with the CBC as required through the County's permitting process would ensure that settlement-related impacts would be less than significant, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

14. Ground Subsidence a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?	☐	☐	☒	☐

Source(s): On-site Inspection, Riverside County General Plan Safety Element (adopted August 6, 2019) Figure S-7 " Documented Subsidence Areas," GIS Database, Report by Leighton, Inc titled, *Geotechnical Exploration and Infiltration Testing, Proposed Crescent Gardens Cemetery, East of the Intersection of Garfield Street and Roberts Street*, March 11, 2024 (Appendix D-1).

Findings of Fact:

a) In general, the Project Site has been mapped outside of any areas of subsidence due to groundwater pumping, peat loss, or oil extraction as delineated by the United States Geological Survey (USGS). The Project Site is identified by the Riverside County General Plan as being in a mapped area with no potential for subsidence except for the eastern portions of parcels 340-180-002, 340-180-005, and 340-180-016, and the western portion of parcel 349-180-004, which are designated as "susceptible" to subsidence. The planned buildings are located on parcels identified by the General Plan as having no potential for subsidence. The parcels identified by the General Plan as being "susceptible" to subsidence are identified for cemetery plot use and interior cemetery roadways, but is underlain by shallow bedrock according to the geotechnical investigation in Appendix D-1. Because the area is outside of groundwater pumping and is underlain by shallow bedrock, impacts would be less than significant, and no mitigation measures are required.

Mitigation: No mitigation is required.

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

Monitoring: No monitoring is required.

15. Other Geologic Hazards a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?	☐	☐	☐	☒

Source(s): Project Application Materials; Report by Leighton, Inc titled, *Geotechnical Exploration and Infiltration Testing, Proposed Crescent Gardens Cemetery, East of the Intersection of Garfield Street and Roberts Street*, March 11, 2024 (Appendix D-1).

Findings of Fact:

a) The Project Site is not located near steep hillsides subject to mudflow or volcanoes (Riverside County General Plan, *Safety Element*). With respect to seiches, the nearest body of water to the Project Site is Canyon Lake, located approximately 1 mile to the east (Google Earth Pro, 2022). A seiche is the sloshing of a closed body of water from earthquake shaking. Seiches are of concern relative to 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. Due to the distance of the closest water body an impact related to seiche would not occur. Therefore, there is no potential for the Proposed Project to be subject to hazards associated with seiches, mudflows, and/or volcanic hazards. No impacts would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

16. Slopes a) Change topography or ground surface relief features?	☐	☐	☒	☐
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	☐	☐	☐	☒
c) Result in grading that affects or negates subsurface sewage disposal systems?	☐	☐	☒	☐

Source(s): Riv. Co. 800-Scale Slope Maps, Project Application Materials, Report by Leighton, Inc titled, *Geotechnical Exploration and Infiltration Testing, Proposed Crescent Gardens Cemetery, East of the Intersection of Garfield Street and Roberts Street*, March 11, 2024 (Appendix D-1), Report by Lakeshore Engineering Inc titled, *Percolation Feasibility Study Report, Conditional Use Permit 23002 Proposed Garden Cemetery*, October 15, 2024 (Appendix D-2).

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

Findings of Fact:

a) As described previously, the Project Site and adjacent parcels range from gentle slopes to relatively flat with rocky outcroppings. Site elevations range from approximately 1,540 to 1,660 feet above mean sea level (amsl), and there are no steep slopes on the Project Site. The Project Site is not situated in or near a steep slope area as identified in ELAP Figure 13 – *Steep Slope*, nor within an area identified on ELAP Figure 14 – *Slope Instability*. The Project Site is located adjacent and to the west of Steep Slopes as mapped on ELAP Figure 14. The Project would grade slopes and place fill as necessary for a more streamlined and stable terrain, and elevations would remain generally similar to existing conditions. Thus, while the Project would change topography or ground surface relief features, the impacts would be less than significant, and no mitigation measures are required.

b) No cut or fill slopes greater than 2:1 are proposed as part of the Proposed Project grading. There would be no impacts.

c) The Proposed Project would install a subsurface sewage disposal system. Percolation tests were performed on the Project Site to design a septic system (Appendix D-2). The study identified that the ground surface on the Project Site is undulating, from gentle to steep sloping ground, distinct high ridgelines, valleys, drainage flowlines and watercourses. Terrian contours in general appears are smooth and uniform, with annual grass and scrub cover. Where buildings are proposed, land is relatively flat with only minor grading needed for building pads construction. The result was that the ground showed no anomaly that could impede system installation. The report further stated that existing ground in the area of proposed leach field are relatively flat with minor earthwork grading required for pad preparation, with less than 3 feet of cuts and/or fill placement needed for building pads construction. No adverse conditions, such as rock outcrops or obstructions were encountered in the field that could impede systems installation. Surface water runoff post systems installation will remain as sheetflow across the subsurface leach field. The installation and grading of the Project Site would be completed pursuant to the County's required specifications for sewer system installation for positive gravity flow. Therefore, there would be no grading that affects or negates subsurface sewage disposal systems. Impacts would be less than significant, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

17. Soils a) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2022), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐

Source(s): U.S.D.A. Soil Conservation Service Soil Surveys, Project Application Materials, Report by Leighton, Inc titled, *Geotechnical Exploration and Infiltration Testing, Proposed Crescent Gardens Cemetery, East of the Intersection of Garfield Street and Roberts Street*, March 11, 2024 (Appendix D-1); Report by Lakeshore Engineering Inc titled, *Percolation Feasibility Study Report, Conditional Use Permit 23002, Proposed Garden Cemetery*, October 15, 2024 (Appendix D-2)

Findings of Fact:

a) Construction activities associated with the Proposed Project's construction over the approximately 46.4 net acres would involve earth movement and the exposure of soil which has the potential to contribute to soil erosion and the loss of topsoil.

According to the geotechnical report in Appendix D-1, the Project Site is generally underlain by a thin mantle of topsoil consisting of loose to medium dense sands with clays and silts, silty sands, and clayey sands. Granitic bedrock was encountered underlying the topsoil in the northwestern portion of the site and generally consisted of white to gray, with zones of orange to orangish brown, reddish brown and brown, intensely weathered to decomposed tonalite (Kgt). Phyllite (Trmp) bedrock encountered underlying the topsoil in the southeastern portion of the site and generally consisted of gray, with fracture surfaces of orange to orangish brown, moderately to intensely weathered. Granitic and metamorphic bedrock in the geotechnical test pits were considered to be slightly weathered where excavation refusal by a backhoe at depths ranging from 1½ to 7½ feet below ground surface (bgs) in the test pits, with shallower bedrock generally being encountered towards the eastern end of the site within the rolling hillsides and deeper bedrock being encountered toward the west.

During construction, the Project would also be required to adhere to standard regulatory requirements designed to reduce erosional impacts, including, but not limited to, requirements imposed by the State Water Resources Control Board Construction General Permit Order 2009-0009-DWQ which requires projects that disturb one (1) or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer (QSD). The Proposed Project is anticipated to disturb more than one acre, and therefore, would be subject to preparation of a SWPPP. The SWPPP would include BMPs to be implemented during and after Project construction to minimize erosion and sedimentation of downstream watercourses. Impacts would be less than significant, and no mitigation measures are required.

For operations, the Proposed Project includes installation of landscape and hardscape features adjacent to the proposed buildings, throughout the proposed parking areas, and interior roads and pathways, which would reduce erosion for these developed areas.

Operations of the cemetery burial grounds area include placing concrete liners with concrete lids in the excavated plots that would be covered with soil that was excavated from the burial plot. It is estimated that each vault would be installed approximately 5 feet below ground surface, and approximately 18 inches of topsoil would be placed on top of each liner with the lid. Gravel would be placed on top of the burial plot. The gravel would secure the topsoil from eroding the top of each of the grave sites. Additionally, as a row of grave sites are completed, concrete bands would be placed around each grave site. This would also prevent the erosion of topsoil.

In addition, as described in Section 23, Hydrology and Water Quality, four water quality/detention basins are designed to slow, filter, and retain stormwater within the landscaped cemetery grounds, which would also reduce the potential for stormwater to erode topsoil. Furthermore, implementation of the Project requires County approval of a Water Quality Management Plan (WQMP), which would ensure that RWQCB requirements and appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. As a result, with implementation of existing requirements, impacts related to substantial soil erosion or loss of topsoil would be less than significant.

b) The geotechnical report prepared for the Project (Appendix D-1) identified that the near-surface materials are low expansive with in expansion potential, as defined in Section 1803.5.3 of the California Building Code (2022). The Riverside County Department of Building and Safety reviews structural plans and geotechnical data prior to issuance of a grading permit and conducts inspections during construction, which would ensure that all required CBC (California Building standards Commission) measures are incorporated. Compliance with the CBC as included as a condition of approval and verified by the County's review process would ensure that impacts related to expansive soils are less than significant.

c) The Project would install an on-site wastewater treatment system (OWTS) that includes a septic tank and leachfields. The geotechnical analysis provided in Appendix D-2 identified that shallow percolation tests were performed, and infiltration rates were good to moderate in the area proposed for the system, which is the northeastern portion of the site, near the proposed buildings. Based on the system layout, each of the three buildings would have its own individual OWTS system. The installation and grading of the Project Site and installation of the OWTS would be completed pursuant to the County's required specifications for sewer system installation for positive gravity flow. The impacts would be less than significant, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

18. Wind Erosion and Blowsand from project either on or off site. a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?	☐	☐	☒	☐

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

Source(s): Riverside County General Plan Safety Element (adopted August 6, 2019) Figure S-8 "Wind Erosion Susceptibility Areas," Riverside County General Plan Safety Element (Adopted Sept. 28, 2021)," GIS database, Ord. No. 460, Article XV & Ord. No. 484.

Findings of Fact:

a) Figure S-8 of the Riverside County General Plan Safety Element adopted August 6, 2019 identified that the Project Site is located within an area of Moderate Wind Erodibility rating. The General Plan Safety Element adopted September 28, 2021 did not evaluate wind erosion and blow sand as an independent risk category, but did evaluate the potential effects of "severe weather" due to climate change. "Severe weather" was defined as localized storms that bring heavy rain, hail, lightning, and strong winds. Severe weather is usually caused by intense storm systems, although types of strong winds can occur without a storm. The Safety Element includes a Vulnerability Assessment that identified "industrial buildings" to have a "moderate vulnerability" to severe weather. The Riverside County Department of Building and Safety reviews structural plans and geotechnical data prior to issuance of a grading permit and conducts inspections during construction, which would ensure that all required CBC (California Building standards Commission) measures, including wind loading, are incorporated. Compliance with the CBC included as a condition of approval and verified by the County's review process would ensure that impacts related to severe weather including wind erosion and blowsand are less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

GREENHOUSE GAS EMISSIONS Would the project:				
20) Greenhouse Gas Emissions a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Source(s): Riverside County General Plan; Riverside County Climate Action Plan ("CAP"); California Emissions Estimator Model (CalEEMod) version 2022 outputs (Appendix A)

Findings of Fact:

a) **Less than Significant Impact.** The County of Riverside's Climate Action Plan Update (CAP) was completed in November 2019. The CAP Update describes Riverside County's GHG emissions for the year 2017, projects how these emissions will increase into 2020, 2030, and 2050, and includes strategies to reduce emissions to a level consistent with the State of California's emissions reduction targets. The CAP Update sets a target to reduce community-wide GHG emission emissions by 15 percent from 2008 levels by 2020, 49 percent by 2030, and 83 percent by 2050.

Appendix D of the Riverside County CAP Update also states that projects that do not exceed the CAP's screening threshold of 3,000 MTCO2e per year are considered to have less than significant GHG emissions and are in compliance with the County's CAP Update. Projects that exceed emissions of 3,000 MTCO2e per year are also required to use Screening Tables. Projects that garner at least 100 points will be consistent with the reduction quantities anticipated in the County's CAP Update. Consistent with CEQA Guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions. Those projects that do not garner 100 points using the Screening Tables will need to provide additional analysis to determine the significance of GHG emissions.

Emissions associated with the construction and operation of the Proposed Project were estimated using CalEEMod version 2022.1. The operational emissions analyzed a Cemetery generating up to 39 daily trips. However, default values were used (46 trips per day). As such, greenhouse gas emissions estimated for the Proposed Project are considered conservative. **Table 5 - *Greenhouse Gas Construction Emissions*** shows that the total for the Proposed Project's construction emissions amortized over 30 years would be approximately 49.6 MTCO2e. **Table 6 - *Greenhouse Gas Operational Emissions*** identifies that the Proposed Project operations would generate approximately 376.1 MTCO2e annually.

Table 5: Greenhouse Gas Construction Emissions (Metric Tons per Year)

Phase I				
Source/Phase	**CO_2**	**CH_4**	**N_20**	**R**
Year 2025	200	<0.0	<0.0	<0.0
Year 2026	168	<0.0	<0.0	<0.0
Total MTCO2e	**368**			
Construction Amortized (30 Years)	**12.3**			
Phase II				
Source/Phase	**CO_2**	**CH_4**	**N_20**	**R**
Year 2026	311	<0.0	<0.0	0.1
Year 2027	158	<0.0	<0.0	<0.0
Total MTCO2e	**476**			
Construction Amortized (30 Years)	**15.8**			
Phase III				
Source/Phase	**CO_2**	**CH_4**	**N_20**	**R**
Year 2027	473	<0.0	<0.0	0.2
Year 2028	157	<0.0	<0.0	<0.0
Total MTCO2e	**645**			
Construction Amortized (30 Years)	**21.5**			
Total of all Phases	**49.6**			

Table 6: Greenhouse Gas Operational Emissions (Metric Tons per Year)

Source/Phase	**CO_2**	**CH_4**	**N_20**	**R**
Mobile	62.4	<0.0	<0.0	0.1
Area	0.4	<0.0	<0.0	---
Energy	68.8	<0.0	<0.0	---
Water	3.6	<0.0	<0.0	---
Waste	8.9	<0.0	<0.0	---
Refrigeration	---	---	---	<0.0
Construction Equipment	158.2	0.2	0.1	---

Construction Amortized (30 Years)	**49.6**
Total MTCO2e	**376.1**
County of Riverside screening threshold	3,000
Significant	**No**

Source: CalEEMod.2022 Annual Emissions.
SCAQMD Emission Factors for construction equipment 2025.

According to the thresholds of significance, a cumulative global climate change impact would not occur. GHG emissions created from the proposed construction and operations of the Proposed Project would not exceed the Riverside County screening thresholds. Therefore, the construction and operation of the Proposed Project would not create a significant cumulative impact to global climate change.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) **Less than Significant Impact.** As referenced above, the County of Riverside CAP Update (updated in December 2019) contains guidance on Riverside County's GHG Inventory reduction goals, thresholds, policies, guidelines, and implementation programs. In particular, the CAP elaborates on the General Plan goals and policies relative to the GHG emissions and provides a specific implementation tool to guide future decisions of the County of Riverside.

Per the County's CAP Update, the County adopted its first CAP in 2015 which set a target to reduce emissions back to 1990 levels by the year 2020 as recommended in the AB 32 Scoping Plan. Furthermore, the goals and supporting measures within the County's CAP Update are proposed to reflect and ensure compliance with changes in the local and State policies and regulations such as SB 32 and California's 2017 Climate Change Scoping Plan. Therefore, compliance with the County's CAP in turn reflects consistency with the goals of the CARB Scoping Plan, Assembly Bill (AB) 32 and Senate Bill (SB) 32.

According to the County's CAP Update, projects that do not exceed emissions of 3,000 MTCO2e per year are also required to include the following efficiency measures:

- Energy efficiency matching or exceeding the Title 24 requirements in effect as of January 2017, and
- Water conservation measures that match the California Green Building Code in effect as of January 2017.

As shown above, the proposed project is anticipated to generate 376.1 MTCO2e per year and would not exceed the County's screening threshold. In addition, prior to issuance of a building permit the applicant will be required to demonstrate consistency with Title 24 energy efficiency building requirements, California Green Building Code, and County water conservation measures. Therefore, the Proposed Project is in compliance with County's screening thresholds. No significant impacts are identified or anticipated, and no mitigation measures are required.

CARB 2022 Scoping Plan

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

The California Air Resources Board 2022 Scoping Plan assesses progress toward the statutory target of reducing GHG emissions to 40 percent below 1990 levels by 2030, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. All of the post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level, and the Proposed Project would be required to comply with these regulations as they come into effect.

The Proposed Project would comply with the CALGreen Code, regarding energy conservation and green building standards. Therefore, the Proposed Project would comply with applicable energy also comply with the CALGreen Code, which includes a variety of different measures, including the reduction of wastewater and water use. In addition, the proposed Project would be required to comply with the California Model Water Efficient Landscape Ordinance. Therefore, the proposed Project would not conflict with any of the water conservation and efficiency measures. Vehicles traveling to the Project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. Therefore, the proposed Project would not conflict with the identified transportation and motor vehicle measures. Implementation of the proposed Project would not conflict with existing plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gas with the 2022 Scoping Plan.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Report by Environmental Managers & Auditors, Inc.. titled *Phase 1 Environmental Site Assessment of Proposed Crescent Gardens Cemetery, Meadowbrook Community*, December 2020, (Appendix E).

Findings of Fact:

a) A hazardous material is a substance that is toxic, flammable/ignitable, reactive, or corrosive. Extremely hazardous materials are substances that show high or chronic toxicity, carcinogenic, bioaccumulative properties, persistence in the environment, or that are water reactive. Improper use, storage, transport, and disposal of hazardous materials and waste may result in harm to humans, surface and groundwater degradation, air pollution, fire, and explosion.

Construction

Construction of the Proposed Project would involve the use and routine transport of small quantities of construction-related chemicals including but not limited to hydraulic fluids, motor oil, grease, runoff, and other related fluids and lubricants. The construction activities would involve the disposal and recycling of materials, trash, and debris. The County's General Plan Safety Element addresses potential hazards in the County and identifies goals and policies to reduce risks and damages associated with hazards, including disposal of hazardous materials due to human activities. Compliance with all local, State and federal regulations related to hazardous materials use and transport during construction would reduce potential hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Operations

The Proposed Project would operate a cemetery. Body preparation in the CCF only includes water and standard, natural body soap and does not include the use of hazardous materials or embalming fluids.

Maintenance of the facilities may involve the use of typical limited hazardous materials, such as: cleaning agents, paints, pesticides, batteries, and aerosol cans. Normal routine use of these types of products would not result in a significant hazard to residents or workers in the vicinity of the Proposed Project as these materials would be handled and stored in compliance with all with applicable federal, state, and local requirements.

The Project would include the use of a backhoe to excavate grave sites. This activity may include but would not be limited to hydraulic fluids, motor oil, grease, runoff, and other related fluids and lubricants. The County's General Plan Safety Element addresses potential hazards in the County and identifies goals and policies to reduce risks and damages associated with hazards, including disposal of hazardous materials due to human activities. The Project operation may include the routine transport of small quantities of fuel, oil and hydraulic fluid to maintain the grave site digging equipment. However, the operator is required to comply with all local, State and federal regulations related to hazardous materials use and transport during operation which would reduce potential hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Therefore, operation of the Proposed Project would result in a less than significant impact related to the routine transport, use, or disposal of hazardous materials and no mitigation measures are required.

b) A Phase 1 Environmental Site Assessment (ESA) was prepared for the Project Site (Appendix E). The Phase 1 ESA identified that there were no potentially hazardous conditions that existed on the Project Site. The Phase 1 ESA identified that the property has generally been historically vacant with some residential structures that have been removed.

Construction

Construction activities would require the temporary use of hazardous substances, such as fuel, lubricants, and other petroleum-based products for the operation of construction equipment as well as oil, solvents, or paints. As a result, the Proposed Project could result in the exposure of persons and/or the environment to an adverse environmental impact due to the accidental release of a hazardous material. However, the transportation, use, and handling of hazardous materials would be temporary and would coincide with the short-term Project construction activities. Further, the construction contractor is required to ensure that these materials would be handled and stored in compliance with all with applicable federal, state, and local requirements. Any handling of hazardous materials would be limited to the quantities and concentrations set forth by the manufacturer and/or applicable regulations, and all hazardous materials would be securely stored in a construction staging area or similar designated location within the Project Site. In addition, the handling, transport, use, and disposal of hazardous materials must comply with all applicable federal, state, and local agencies and regulations, including the Department of Toxic Substances Control; Occupational Health and Safety Administration (OSHA); Caltrans; and the County Health Department - Hazardous Materials Management Services.

Operations

As discussed, the Proposed Project would operate a cemetery. Body preparation in the CCF only includes water and standard, natural body soap and does not include the use of hazardous materials or embalming fluids. The business operation would generally use typical limited hazardous materials, such as: cleaning agents, paints, pesticides, batteries, and aerosol cans. Normal routine use of these types of products would not result in a significant hazard to residents or workers in the vicinity of the Proposed Project as these materials would be handled and stored in compliance with all applicable federal, state, and local requirements. Impacts would be less than significant, and no mitigation measures are required.

c) The Proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan. Project construction would occur on a vacant parcel. Short-term construction of off-site improvements will occur along local roadways, but the construction will be conducted consistent with all applicable rules for traffic control which outlines procedures for emergency situations. The Project design allows for adequate emergency access off the site onto local roads. Evacuation routes are determined by the local emergency services; none are identified adjacent to the

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

Project Site. The Proposed Project would be reviewed by the local emergency services agencies for compliance with all applicable codes. Impacts would be less than significant, and no mitigation measures are required.

d) The Quail Valley Elementary School is located approximately 2 miles east of the Project. Small quantities of fuel and lubricants will be transported to the Project Site during construction. As previously discussed, the limited quantities of hazardous materials would be transported, handled, and disposed of in accordance with all regulations. Additionally, the potential emissions that would be generated from construction and operation of the Proposed Project were evaluated in the air quality analyses presented in this document which identified that the emissions generated from the Proposed Project would not cause or contribute to an exceedance of the federal or state air quality standards. Thus, the Proposed Project would not emit hazardous or handle acutely hazardous materials, substances, or waste within 0.25 mile of school. No impacts would occur.

e) The Phase 1 ESA prepared for the Project (Appendix E) included a historical literature review of the Project Site and surrounding area. The results indicated that the Project Site is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, construction and operation of the Proposed Project would not create a significant hazard to the public or the environment. No impacts would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

20. Airports a) Result in an inconsistency with an Airport Master Plan?	☐	☐	☐	☒
b) Require review by the Airport Land Use Commission?	☐	☐	☐	☒
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

Source(s): Riverside County General Plan Figure S-20 “Airport Locations,” GIS database.

Findings of Fact:

a) The Project Site is not located within an Airport Master Plan; therefore, the Project would not result in an inconsistency with an Airport Master Plan. There would be no impacts.

b) The Project Site is not located near any airport, therefore, land use approvals do not apply. The closet airport is the March Air Reserve Base in Perris, located approximately 10 miles

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

to the northeast and the Perris Valley Airport, located approximately 5 miles to the east/northeast. The Project Site is outside of any airport compatibility zone, based on a review of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (November 2014) and the Riverside County Airport Land Use Plan Policy Document for the Perris Valley Airport (July 2010). There would be no impacts.

c) Refer to Item 20.b above. There would be no impacts.

d) The Project Site is not located within two miles of any private airstrip, or heliport; therefore, the Project would not create a safety hazard for people residing or working in the Project area. There would be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Riverside County General Plan Figure S-9 “Special Flood Hazard Areas,” Figure S-10 “Dam Failure Inundation Zone,” GIS database; Report by Hunsaker & Associates Irvine Inc, titled *Preliminary Hydrology Report for Crescent Gardens Cemetery*, January 2025 (Appendix F-1); Report

by Hunsaker & Associates Irvine Inc, titled *Preliminary Water Quality Management Plan, Crescent Gardens Cemetery*, March 13, 2024 (Appendix F-2).

The Project Site is situated approximately 5 miles northeast of Lake Elsinore and approximately 1 mile west of Canyon Lake, which is a source of drinking water that is provided by the Elsinore Valley Municipal Water District (EVMWD). The EVMWD obtains its potable water supplies from imported water from the Metropolitan Water District, local surface water from Canyon Lake, and local groundwater from the Elsinore Basin. Additionally, the groundwater obtained from its groundwater wells is disinfected with chlorine and chloramines at the wellhead and represents 40-50 percent of drinking water supplies.

Findings of Fact:

a) Groundwater and surface water at the Project Site is regulated by the Regional Water Quality Control Board-Santa Ana Region (SARWQCB). The Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) contains the Region Board's policies for managing the Region's water quality. The Basin Plan includes the water quality standards (water quality objectives, beneficial uses, and anti-degradation policy) for the Region, regionally important water quality management and improvement initiatives, policies and practices for implementing water quality standards, and implementation plans. The Project Site is within the San Jacinto River Basin.

   According to the Preliminary Water Quality Management Plan (PWQMP, Appendix F-2), receiving waters include Canyon Lake and Lake Elsinore. **Table 7: *Beneficial Uses of Receiving Waters*** identifies the Basin Plan's beneficial uses for these water bodies and **Table 8: *Water Quality Objectives for Receiving Waters*** identifies the water quality standards as identified in the Basin Plan.

Table 7: Beneficial Uses of Receiving Waters

Beneficial Use	Canyon Lake (Railroad Canyon Reservoir)	Lake Elsinore
Municipal and Domestic Supply (MUN)	X	(excepted from MUN)
Agricultural Supply (AGR)	X	
Industrial Service Supply (IND)		
Industrial Process Supply (PROC)		
Groundwater Recharge (GWR)	X	
Navigation (NAV)		
Hydropower Generation (POW)		
Water Contact Recreation (REC1: Primary Contact Recreation)	X	X
Non-contact Water Recreation (REC2: Secondary Contact Recreation)	X	X
Commercial and Sportfishing (COMM)	X	X
Warm Freshwater Habitat (WARM)	X	X
Limited Warm Freshwater Habitat (LWRM)		
Cold Freshwater Habitat (COLD)		
Preservation of Biological Habitats of Special Significance (BIOL)		
Wildlife Habitat (WILD)	X	X

Beneficial Use	Canyon Lake (Railroad Canyon Reservoir)	Lake Elsinore
Rare, Threatened or Endangered Species (RARE)		X
Spawning, Reproduction and Development (SPWN)		
Marine Habitat (MAR)		

Source: Basin Plan, Chapter 3, Table 3-1

Table 8: Water Quality Objectives for Receiving Waters

Constituent	Canyon Lake (Railroad Canyon Reservoir)(1)	Elsinore, Lake(2)
Total Dissolved Solids	700	2,000
Hardness	325	---
Sodium	100	---
Chloride	90	---
Total Inorganic Nitrogen	8	1.5
Sulfate	290	---
Chemical Oxygen Demand	---	---

Source: Basin Plan, Chapter 3, Table 3-1
Notes:
(1) The quality objectives for Canyon Lake is not intended to preclude transport of water supplies or delivery to the Lake
(2) Lake volume and quality highly variable

In 1998, Canyon Lake was added to the SARWQCB list of "impaired" waters based on periodic algal blooms and fish kills. In 2004, a mechanism was adopted by the SARWQCB to regulate the amount of nutrients released into the area tributary to Canyon Lake (i.e., Total Maximum Daily Load or TMDL). Because Canyon Lake is an "impaired" waterbody, all properties that drain to it must provide stormwater treatment that targets the pollutants for which the lake is listed during construction and long-term operation. The SARWQCB enforces the regulations that target pollutants discharged from construction activities as well as long-term operational activities, including National Pollutant Discharge Elimination System (NPDES) permits. The Project site is not located within a groundwater management zone (GMZ) designated by the SARWQCB Basin Plan (SARWQCB-A) and the Project is not located within a groundwater basin identified by the California Department of Water Resources (DWR) Bulletin 118. However, Canyon Lake is a tributary to the Elsinore GMZ and the Elsinore Valley Groundwater Basin.

Construction

Construction activities and post-construction operations may have the potential to discharge pollutants to downstream waterbodies during storm events and incidental (non-rainfall) runoff, which could violate water quality standards/waste discharge requirements. The SARWQCB requires that dischargers whose construction projects disturb one (1) or

more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs 1 or more acres, obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation. The Construction General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer (QSD).

The Proposed Project would disturb approximately 46.4 of the 89 acres in three phases over 15-20 years. It is anticipated that individual SWPPPs would be prepared for each phase. Phase 1, as described in the Project Description of this document, would be completed as one phase. However, because development of Phase 2 and Phase 3 requires significant soil import, it is anticipated that Phase 2 and Phase 3 would be developed in subareas, based on soil availability. It is anticipated that soil would be stockpiled until it is used for construction.

The Project SWPPP which would be developed for each phase of construction, modified if necessary to include the subphases. The SWPPP would include construction BMPs to minimize the potential for construction related sources of pollution, per County conditions of approval. Construction BMPs may include but not be limited to:

- Silt fencing, fiber rolls, or gravel bags
- Street sweeping and vacuuming
- Storm drain inlet protection
- Stabilized construction entrance/exit
- Vehicle and equipment maintenance, cleaning, and fueling
- Hydroseeding
- Material delivery and storage
- Stockpile management
- Spill prevention and control
- Solid waste management
- Concrete waste management

Adherence to the existing requirements and implementation of the appropriate BMPs per the permitting process would ensure that activities associated with construction would not violate water quality standards. As a result, impacts related to the degradation of water quality during construction of the Proposed Project would be less than significant.

Post-Construction and Operations – Surface Water

Riverside County and 23 other cities and agencies obtained a joint permit NPDES permit from the SARWQCB (Order No. R8-2010-0033, NPDES Permit No. CAS618033) to control pollutants in runoff. The NPDES requires the preparation of a Water Quality Management Plan (WQMP). The WQMP outlines what method(s) are to be employed to effectively treat in perpetuity the required amount of post-construction stormwater and incidental runoff for the expected pollutants. Methods include infiltration systems, bioretention or biotreatment basins, sand filters and harvest/reuse cisterns. The Project will be required to comply with the MS4 requirements to minimize the release of pollutants into downstream surface and ground waters from redevelopment projects.

The Proposed Project has prepared a Project Specific Preliminary Water Quality Management Plan (PWQMP), which is provided in Appendix F-2. The PWQMP identifies stormwater controls for the post-construction condition and includes Low Impact Development (LID) site design, source control, and treatment control BMPs. The County would review and approve the PWQMP as part of the design for the Proposed Project.

The PWQMP Drainage from the proposed surface drainage and storm drain facilities will either be conveyed to one of the four water quality/detention basins or be conveyed off-site to existing natural channels depending on the location and drainage patterns. requirements. The proposed drainage basins are designed to convey the 100-year peak flow generated on the Project Site and are designed to mitigate any water quality and hydromodification impacts of the proposed development. The first flush of all storm runoff will be treated in the water quality/detention basins prior to leaving the Project Site, as detailed in the WQMP. The proposed grading of the Project Site slightly alters the original drainage boundaries and drainage areas of the existing Project Site but does not significantly alter the original drainage patterns or runoff discharge locations.

The PWQMP in Appendix F-2 identifies the Drainage Management Areas (DMA) of the site, where flows would be directed based on grading, and how the flows would be treated as follows:

- DMA A (1.8 acres) – Consists of a chapel and parking lot. Majority of runoff from this DMA will be conveyed to a Bioretention Basin/Detention Basin located at the northeast corner of the DMA A.
- DMA B (2.2 acres) – Consists of a chapel, caretaker's residence and parking lot. Majority of runoff from this DMA will be conveyed to Bioretention Basin/Detention basin located in the eastern corner of the DMA B.
- DMA C (0.3 acres) – Consists of the western portion of "A" Street. The low point of DMA C is located adjacent to the 100-year flood plain limit, therefore a BMP is not suitable for this location. DMA H has been oversized to mitigate flows for DMA C.
- DMA D (0.4 acres) – Consists of the eastern portion of "A" Street. The low point of DMA D is located adjacent to the 100-year flood plain limit, therefore a BMP is not suitable for this location. DMA H has been oversized to mitigate flows for DMA D.
- DMA E (1.6 acres) – Consists of a grave site and will be considered "Self-Treating" and will convey flows off site to natural area and will not comingle flows.
- DMA F (1.8 acres) - Consists of a grave site and will be considered "Self-Treating" and will convey flows off site to natural area and will not comingle flows.
- DMA G (33.6 acres) – Consists of grave sites, "B" Street, "D" Street and a portion of "A" Street and will convey flows to a proposed Bioretention Basin.
- DMA H (7.8 acres) – Consists of grave sites, portion of "B" Street and "E" Street and will convey flows to a proposed Proprietary Biofiltration System (8'x20' Modular Wetland System). DMA H has been oversized to mitigate flows from DMA C and DMA D that are adjacent to the flood plain limits and the street area within the flood plain limits.

- DMA I (6.3 acres) – Consists of grave sites and "C" Street and will convey flows to a proposed Bioretention Basin/Detention Basin.

Additionally, there is no publicly operated wastewater system that serves the area. The Project proposes to construct an onsite septic system for its employees and visitors. The system would be designed in accordance with County standards and approved by the County.

Additionally, the EVMWD collects water samples weekly, monthly, quarterly, annually and tri-annually to ensure the safety and quality of the water served. Sample frequency depends on State regulations and health risk factors. Therefore, any potential increase in constituents that may enter the groundwater or surface waters that may be attributed to the cemetery would be identified early through routine sampling.

Post-Construction and Operations – Groundwater

The Project's geotechnical report (Appendix D-1) identifies that groundwater at the Project Site occurs at a depth of approximately 147 feet below ground surface. It acknowledged that perched groundwater may occur at between 13 and 15 feet in some areas, depending soil type and precipitation.

The Project proposes a burial process that reduces risk to groundwater quality as only the natural body would decay in a grave that would be approximately 5 feet below ground surface. The process does not utilize makeup or cosmetics, formaldehyde or other embalming fluids that could enter the groundwater during the body's decomposition process. The burial also does not include the use of a casket where paints and plastics and metal can also decay over time and potentially cause an impact to groundwater quality.

Preparing the body for the grave consists of washing the body is washed with traditional soap and water in the CCF, where the waste rinse water would be directed into a separate tank that would be pumped and disposed of by a licensed vendor, and would not be directed to the septic system. This method would ensure that any biological pathogens would not enter into the groundwater. Plot development consists of excavating a rectangle shape in the earth that would be approximately 5 feet deep 3 feet wide with a soil bottom (refer to Figure 8B). A bottomless concrete liner with a lid would be placed in the excavated space. The body would be placed in the concrete vault, and a concrete lid would be placed on top of the concrete liner. Approximately 18 inches of soil would be placed on the top of the lid.

A 2015 article in the Journal of Water and Health[1] studied the impact on groundwater contamination by bacteria and viruses caused by cemeteries. It identified that while corps can release bacteria, many pathogens gradually die after the death of the host body as they are not capable of surviving for a long time outside of the host body, especially when environmental conditions are inappropriate. While the study was conducted in various areas of the world and not directly in the United States, the study concluded that in a moderate climate condition, a relatively low impact of cemeteries on groundwater pollution by bacteria

[1] *Journal of Water and Health,* Volume 13, Issue 2, as accessed 11/10/24 at: https://iwaponline.com/jwh/article/13/2/285/28303/Impact-of-cemeteries-on-groundwater-contamination

and viruses was observed. Additionally, it identified that the bottom of the grave should be at least 5 feet above the groundwater level.

According to the geotechnical report (Appendix D-1), groundwater primarily exists at 147 feet below ground surface, although perched groundwater may occur at between 13 and 15 feet in some areas, depending soil type and precipitation. Plot development consists of excavating a rectangle shape in the earth that would be approximately 5 feet deep 3 feet wide with a soil bottom (refer to Figure 8B). Therefore, there would be approximately a minimum of a 6-foot earthen buffer between the bottom of the grave and any perched groundwater pocket that may occur, which also reduces potential for bacteria to directly enter the groundwater during natural body decay.

Therefore, with implementation of the SWPPP during construction and implementation of the WQMP during operations, as well as the operational burial practices, the Project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant, and no mitigation measures are required.

b) The Project site is not located within a groundwater management zone (GMZ) designated by the SARWQCB Basin Plan and the Project is not located within a groundwater basin identified by the California Department of Water Resources (DWR) Bulletin 118. However, Canyon Lake is tributary to the Elsinore GMZ and the Elsinore Valley Groundwater Basin area and may contribute to recharge of that basin.

There are two wells on site; however, they are non-operable, and no permits for them could be located. These wells are believed to be associated with previous agricultural activities. The Project will not refurbish these wells nor construct new wells. All water supplied to the site will be from the Elsinore Valley Municipal Water District. The Project site may provide groundwater recharge benefits because of the approximately 85-acre site, approximately 51 acres (approximately 57 percent) will either remain undeveloped or consist of landscaping, basins and graded slopes. The Project design includes four earthen water quality/detention basins that would collect stormwater from the impervious surfaces and allow it to percolate in the ground. The approximately 31 acres of impervious surfaces (approximately 36 percent) includes 9.12 acres of parking, roads and paved areas, and 24.6 acres of grave plots that would consist of a concrete vault, topped with soil and gravel. Hence, the Project may continue to be a source of potential groundwater recharge in the future.

Therefore, the Proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Proposed Project may impede sustainable groundwater management of the groundwater basin. Impacts would be less than significant, and no mitigation is required.

c) One unnamed drainage feature (Drainage 1) was observed within the boundaries of the Project Site at the time of the investigation (Appendix B-2). Drainage 1 extends from south to north within the northwest region of the project site. Drainage 1 conveys flows primarily outside of the proposed limits of disturbance before terminating near the northwest corner of the site. Drainage 1 receives flows direct precipitation upstream and from the discharge waters of a well in the middle of the drainage, outside the proposed limits of disturbance,

which was installed to provide water to onsite agricultural activities. The upstream portion of Drainage 1 appears to only support surface water immediately following storm events. An interior roadway is planned to cross this drainage. As such, a road culvert will be placed within the drainage to facilitate the road. Project approvals include a PWQMP developed to satisfy the requirements of the adopted NPDES program, which would be verified by the County's Building and Safety Division through the County's permitting process and through conditions of approval. Therefore, the Proposed Project would result in less than significant impacts related to alteration of the drainage pattern of the site or area, and no mitigation measures are required.

d) As discussed in 21.a, the phase-specific SWPPPs that would be prepared for each phase of construction by the project contractor would include BMPs to be implemented during and after project construction to minimize erosion or siltation on-site and/or off-site. Implementation of a WQMP would provide operational BMPs to ensure that operation of cemetery use would not result in erosion or siltation. Impacts would be less than significant, and no mitigation measures are required.

e) Project construction includes the preparation of phase-specific SWPPPs that would include BMPs to be implemented during Project construction to minimize the rate and/or amount of surface runoff during construction. The Project's drainage features would make the site drainage consistent with the existing drainage pattern for the area (refer to Appendix F-1). Therefore, the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site. Impacts would be less than significant, and no mitigation measures are required.

f) The Proposed Project's stormwater would not exceed the capacity of the existing or planned stormwater drainage system in the area because the Project proposes to retain all stormwater on site. Therefore, the Project would not 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. Impacts would be less than significant, and no mitigation measures are required.

g) As indicated in General Plan Figure S-9 and S-10, the Project Site is not located in an area with the potential for flood hazards where the Proposed Project would impede or redirect flood flows. According to FEMA FIRM Panel No. 06065C2034G (8//28/2008) and Panel No. 6065C2032G (3/28/2008), the Project is within "Zone X" which is defined as "Area of Minimal Flood Hazard" and outside of a 0.2 percent (500-year) annual chance floodplain. This designation is not a special flood hazard zone and would not require flood insurance. Because the Project is not located within a flood hazard zone and outside of the 0.2 percent 500-year flood plain, the Proposed Project will not impede or redirect flood flows. There would be no impacts.

h) As indicated in General Plan Figure S-9 and S-10, the Project Site is not located in an area of a flood hazard, tsunami, or seiche zone. Therefore, there is no risk related to the release of pollutants due to Project Site inundation. There would be no impacts.

i) The Project receives potable water service from EVMWD which serves both groundwater and imported water. EVMWD pumps water from the Elsinore Valley Basin located to the west of Canyon Lake and the Bedford-Coldwater Basin located northwest of Lake Elsinore.

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

EVMWD has been actively managing these groundwater basins and currently serves as the Groundwater Sustainability Agency (GSA) for the Elsinore Valley basin, referred to as "EVGSA," and as a partner in the Bedford-Coldwater Groundwater Sustainability Authority (BCGSA), which serves as the GSA for the Bedford-Coldwater basin. Both GSAs are in the process of developing groundwater sustainability plans (GSPs), which call for the basins to be sustainably managed. The Project Site is located in the Elsinore Valley GSA, according to the Department of Water Resources Sustainable Groundwater Management Area GIS mapping portal (https://sgma.water.ca.gov/webgis/index.jsp?jsonfile=https%3a%2f%2fsgma.water.ca.gov%2fportal%2fresources%2fjs%2fmapconfigs%2fGsaMaster.js, accessed 1/24/25).

Because the Project, by design, allows for future recharge or other groundwater management activities to sustainably manage surrounding basins, the proposed Project will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

As described previously, the Proposed Project would be required to have approved SWPPPs for each phase of construction, which would include construction BMPs to minimize the potential for construction related sources of pollution. For operations, the Proposed Project would be required to implement source control BMPs to minimize the introduction of pollutants; and treatment control BMPs to treat runoff in accordance with its approved WQMP. With implementation of the operational source and treatment control BMPs that would be required by the County during the Project permitting and approval process, potential pollutants would be reduced to the maximum extent feasible, and implementation of the Proposed Project would not obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts are less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

LAND USE/PLANNING Would the project:				
22. Land Use a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?	☐	☐	☐	☒

Source(s): Riverside County General Plan, GIS database, Project Application Materials.

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

Findings of Fact:

The Project Site lies within the Elsinore Area Plan (ELAP). The Land Use of the parcels range from Rural Mountainous (RM) with a General Plan Foundation Component of Rural and a Land Use of Very Low Density Residential (VLDR) with a General Plan Foundation Component of Community Development. The Project Site is located within the unincorporated community of Meadowbrook, which is characterized by very low density residential development and vacant properties set amid rolling hills.

The Project does not lie within any of the policy or Land Use Overlay areas of the ELAP. Impacts would be less than significant, and no mitigation measures are required.

a) The Proposed Project would occur over approximately 46.4 acres of approximately 85 acres of vacant lands located at the eastern edge of where rural residential has developed in the area, where rolling hills and vacant land exist. The Proposed Project will not disrupt or divide the physical arrangement of the community because the Proposed Project is allowed within the zoning with a conditional use permit. There would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Riverside County General Plan Figure OS-6 “Mineral Resources Area.”

Findings of Fact:

a) The State Mining and Geology Board (SMGB) has also established Mineral Classification Zones (MRZs) to designate lands that contain mineral deposits. The Riverside County General Plan identifies the Project area as “MRZ-3 (areas where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined). No mining activities are proposed. An area with undetermined mineral significance would not be valuable to the region or residents of the state until its mineral significance is confirmed. Additionally, the Project Site is surrounded by residential. The current uses of the Project Site and surrounding areas are not compatible with mineral resource extraction. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required. There would be no impacts.

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

b) The Project is zoned MRZ-3 which contains undetermined mineral deposits. However, the Project Site is not located within a planning area designated for mining. There would be no impacts.

c) There are no existing or abandoned mines or quarries on site. There would be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

NOISE Would the project result in:				
24. Airport Noise a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Source(s): Riverside County General Plan Figure S-20 "Airport Locations," County of Riverside Airport Facilities Map.

Findings of Fact:

a) The Project Site is not located near any airport; therefore, project would not expose people residing or working in the project area to excessive noise levels. The closet airport is the March Air Reserve Base in Perris, located approximately 10 miles to the northeast and the Perris Valley Airport, located approximately 5 miles to the east/northeast. There would be no impact.

b) There are no private airstrips in the vicinity of the Project. There would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

25. Noise Effects by the Project a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐

Source(s): Riverside County General Plan, Table N-1 ("Land Use Compatibility for Community Noise Exposure"), Report by Report by MD Acoustics titled, *Crescent Gardens Cemetery*, *Noise Impact Analysis*, May 16, 2024 (Appendix G).

Findings of Fact:

a) Environmental noise is commonly measured in A-weighted decibels (dBA). A decibel (dB) is a unit of sound energy intensity. Sound waves, traveling outward from a source, exert a sound pressure level (commonly called a "sound level") measured in dB. An A-weighted decibel (dBA) is a decibel corrected for the variation in frequency response that duplicates the sensitivity of human ears. Decibels are measured on a logarithmic scale. Generally, a 3 dBA increase in ambient noise levels represents the threshold at which most people can detect a change in the noise environment; an increase of 10 dBA is perceived as a doubling of loudness.

To determine potential noise impact standards, the Noise Impact Analysis in Appendix G utilized the criteria standards provided in **Table 9: *Riverside County Allowable Exterior Noise Level***.

Table 9: Riverside County Allowable Exterior Noise Level

General Plan Land Use Designation	Maximum Decibel Level	
	7 a.m. - 10 p.m.	10 p.m. - 7 a.m.
Low Density Residential	55	45
Medium Density Residential	55	45
Medium High Density Residential	55	45
Commercial Retail	65	55
Light Industrial	75	55

The Noise Impact Study also analyzed the existing noise levels at four noise-sensitive receptor locations closest to the Project Site on March 22, 2024, along property lines of residential uses to the west and to the south based on the site layout and operational aspects of the site.

Construction

The County of Riverside outlines its noise standards within its General Plan and Riverside County Ordinance 847. Ordinance 847 also identifies a list of exemptions and exceptions to the noise standards which includes construction and demolition. Riverside Ordinance 847 identifies that private construction within one-quarter of a mile from an inhabited dwelling cannot occur between the hours of 6:00 p.m. and 6:00 a.m. during the months of June through September; and between the hours of 6:00 p.m. and 7:00 a.m. during the months of October through May.

Construction noise would be limited primarily to the use of the heavy equipment for site grading and excavating activities at the site which will be short-term in nature.

Phase 1 consists of 7.8 acres of cemetery land that would be developed east and southeast of the CCF/chapel area and offer a projected 6,237 plots, as well as several buildings and entry features at Garfield Road. All cemetery land site work consists of a cut and fill designed to balance, therefore, there would be no import or export of material. Phase 1 is

anticipated to occur over 12 months. The remaining phases would occur occasionally over the next 15 to 20 years as import soil and finances become available.

Construction overall will occur during the permissible hours as described in the County of Riverside Noise Ordinance 847.

Construction noise associated with the project was calculated at nearby sensitive receptors utilizing methodology presented in the Federal Highway Administration (FHWA) Construction Noise Model together with several key construction parameters including distance to each sensitive receiver, equipment usage, percent usage factor, and baseline parameters for the project site.

Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. The distance to the closest receiver from the center of the site represents an average of equipment moving around the site per the FTA Noise and Vibration Manual. Additionally, the FTA Noise and Vibration Manual gives a daytime noise criterium of 80 dBA Leq of residential land uses. **Table 10: *Construction Noise Level Compliance***. The Noise Impact Study also analyzed the construction noise levels at the closest sensitive receptor, identified to be the residence located to the west of the main entrance.

Table 10: Construction Noise Level Compliance

Phase 1 Activity	Leq Noise Levels at Nearest Sensitive Receptor (dBA)	Criteria	Criteria Exceeded?
Demolition	66	80	No
Site Prep	63	80	No
Grading	68	80	No
Building Construction	66	80	No
Paving	62	80	No
Arch coat	53	80	No
Phase 2 (Future)	40	80	No
Phase 3 (Future)	52	80	No

Note:
Construction Modeling Worksheets are provided in Appendix G.

Construction noise would range from 53 to 68 dBA Leq at the residential use located to the west of the Project Site. If construction does not occur outside the permitted hours outlined in Riverside County Ordinance 847, the Project would be exempt from the provisions of the County of Riverside Municipal Code. Thus, the Project would adhere to the local noise guidelines for construction activities and the impact is less than significant. Additionally, the construction noise is below the FTA Noise and Vibration Manual criterium for daytime residential construction noise. Therefore, the noise impacts due to Project construction noise are considered less than significant at all receiver locations.

Operations

Operations consist of a cemetery where operational noise would generally consist of traffic traveling to the site to attend the funeral, the HVAC units in the buildings, and a single piece of equipment such as a small backhoe to dig and fill the grave sites as required. There would be no singing or outdoor music. As no or minimal operations would occur at night, the noise would be minimal after 10 pm.

Sensitive receptors that may be affected by project operational noise include existing residences to the west and south. Operational noise, evaluated in Appendix G, was determined to fall below the County of Riverside's residential daytime noise standard as identified in **Table 11: *Operational Noise Level Compliance*.**

Table 11: Operational Noise Level Compliance

Receptor[1]	Existing Ambient Noise Level (dBA, Leq)[2]	Project Noise Level (dBA, Lmax)[3]	Daytime (7 a.m. - 10 p.m.) Non Transp. Noise Limit (dBA, Lmax)	Total Combined Noise Level (dBA, Lmax)
1	48	50	55	52
2	45	51	55	52
3	42	48	55	49
4	42	46	55	47

Notes:
1. Receptors 1 and 2 represent residential uses to the west. Receptors 3 and 4 represent the southern property line.
2. See Appendix G for the ambient noise measurement.
3. See Exhibit F in Appendix G for the operational noise level projections at said receptors.

The Project will be conditioned to operate within the County of Riverside guidelines for type of use and hours of operation.

Traffic

A worst-case Project generated traffic noise level was modeled utilizing the FHWA Traffic Noise Prediction Model - FHWA-RD-77-108. Traffic noise levels were calculated 50 feet from the centerline of the analyzed roadways in the noise analysis in Appendix G. The noise analysis identified that the change in traffic noise along Greenwald Avenue, north of Suzan Street, which is the main roadway anticipated to be utilized to access the site would be 0.1 dbA, which would not be perceptible.

Impacts would be less than significant, and no mitigation measures are required.

b) The Caltrans Transportation and Construction Vibration Guidance Manual (Guidance Manual) is used to evaluate potential construction vibration impacts related to both potential building damage and human annoyance (Appendix G). Based on the Caltrans criteria shown in Table 19 of the Guidance Manual, construction vibration impacts would be significant if vibration levels exceed 1.0 inches per second (in/sec) PPV (transient sources) and 0.5 in./sec. PPV (continuous/frequent intermittent sources) for new residential structures.

Certain types of construction equipment can generate high levels of ground borne vibration. Construction of the Proposed Project would potentially utilize bulldozers, loaded trucks, and jackhammers during construction phases. Vibration impacts are assessed based on the distance from the location of vibration-intensive construction activities, conservatively assumed to be at edge of a project site, to the edge of nearby off-site structures.

Table 12: *Vibration Source Levels for Construction Equipment* presents the combined noise levels for the loudest construction equipment, assuming they operate at the same time. As shown on Table 9, the construction noise levels are expected to range from 50.4 to 58.9 dBA L_{eq} at the nearby receiver locations (Appendix G).

Table 12: Vibration Source Levels for Construction Equipment

Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level LV (dVB) at 25 feet
Pile driver (impact)	1.518 (upper range)	112
	0.644 (typical)	104
Pile driver (sonic)	0.734 upper range	105
	0.170 typical	93
Clam shovel drop (slurry wall)	0.202	94
Hydromill	0.008 in soil	66
(slurry wall)	0.017 in rock	75
Vibratory Roller	0.21	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

[1] Source: Transit Noise and Vibration Impact Assessment, Federal Transit Administration, May 2006.

At a distance of 40 feet (distance from the site to the nearest residences), a vibratory roller would yield a worst-case 0.125 PPV (in/sec) which may be perceptible but below any risk of damage (0.5 in/sec PPV is the threshold of old residential structures). The impact is less than significant, and no mitigation is required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

PALEONTOLOGICAL RESOURCES:				
26. Paleontological Resources a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?	☐	☒	☐	☐

Source(s): Riverside County General Plan Figure OS-8, Report by Leighton, Inc titled, *Geotechnical Exploration and Infiltration Testing, Proposed Crescent Gardens Cemetery, East of the Intersection of Garfield Street and Roberts Street,* March 11, 2024 (Appendix D-1); Report by CRM Tech titled, *Paleontological Resources Assessment Report, Crescent Gardens Cemetery Project*, August 28, 2023 (Appendix D-3).

Findings of Fact:

a) The site is located within a prominent geomorphic feature known as the Perris Block (Appendix D-1). The Perris Block is comprised of various granitic rocks underlain by pre-batholithic low grade crystalline rocks characterized as metamorphic rock of Mesozoic age which manifest mostly at the ground surface near the margins of the Perris block.

The valley areas of the region are characterized by accumulated alluvial sediment consisting of stratified sequences of sand, silt and clay that is moderately consolidated. The alluvial sediment is underlain at depth by the granitic rock of the Perris block. Isolated outcrops of these granitic rocks are noted on-site confined to the north and northwest portions of the property. The rocks consist mainly of granodiorite, gabbro, and tonalite. These resistant rock outcrops are surrounded by thin accumulations of older alluvial soil that has accumulated over time, likely dating back to the late Pleistocene. Pleistocene units are considered to be highly paleontologically sensitive.

In order to identify any paleontological resource localities that may exist in or near the Project area and to assess the probability for such resources to be encountered during the Project, a paleontological records search, literature review, and a field inspection of the Project area were conducted (Appendix D-3).

The results of the paleontological analysis in D-3 identified that the majority of the site is situated on top of tonalite sediments that date to the Cretaceous period and Mesozoic-age phyllite sediments with a north-south trending, late- to middle-Pleistocene band of alluvial-channel deposits in the mid-south-southeastern part of the project area. The tonalite and phyllite deposits are considered to be of low paleontological sensitivity. The old alluvial channel deposits, however, have a higher paleontological sensitivity. The paleontological records search indicated that no paleontological localities have been reported within the project area or within 1 mile of its borders. However, numerous fossil localities have been reported throughout Riverside County in old alluvial channel deposits similar to those present in the mid-south-southeastern portion of the project area, making these types of sediments to be considered highly sensitive for paleontological resources.

The Riverside County General Plan identifies that most of the Project Site is of a low paleontological sensitivity while the eastern portion has a “undetermined” sensitivity for paleontological resources.

As a result, Mitigation Measure PAL-1 is included to require that any substantial excavations below 4 feet in the old alluvial-channel deposits in the mid-south-southeastern corner of the project area be monitored to identify and recover any significant fossil remains. With implementation of Mitigation Measure PAL-1, impacts to paleontological resources would be less than significant.

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

Impacts would be less than significant with mitigation incorporated.

Mitigation: The following mitigation measure is required:

PAL – 1 Paleontological Monitoring. Prior to the issuance of grading permits, the Applicant shall provide a letter to the County of Riverside Planning Department, or designee, from a professional paleontologist, stating that a qualified paleontologist has been retained to provide services for the Project. The paleontologist will monitor all site preparation activities that involve excavations that extend down into older Pleistocene-aged deposits. In the event paleontological resources are encountered, ground disturbing activity within 50 feet of the area shall cease. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered.

Monitoring: Monitoring is required pursuant to Mitigation Measure PAL-1, above.

POPULATION AND HOUSING Would the project:				
27. Housing a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	☐	☐	☒	☐
c) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐

Source(s): Project Application Materials, GIS database, Riverside County General Plan Housing Element.

Findings of Fact:

a) The Project Site is vacant and unoccupied, therefore, construction and operations of the Project will not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. There would be no impact.

b) The Proposed Project would develop a cemetery with gathering facilities and grounds. For purposes of analysis, the Project is estimated to require approximately 1 to 3 employees. The employees that would fill these roles are anticipated to reside within commuting distance and would not generate needs for any housing. The California Employment Development Department Labor Market Information Division published an average 3.9% unemployment rate in March 2023 for the four communities near the Project Site (Moreno Valley, Nuevo, Perris, and Riverside).

In addition, should the Project require employees to relocate to the area for work, there is sufficient vacant housing available within the region, including the Mead Valley area, City of Perris, City of Hemet, City of Moreno Valley and City of Menifee. Riverside County, and the cities within proximity to Mead Valley, have adopted General Plan Housing Elements which describe their jurisdiction's strategies for accommodating affordable housing. Thus, the Proposed Project would not create a demand for substantial additional housing, including housing affordable to households earning 80 percent or less of the County's median income. Impacts would be less than significant, and no mitigation measures are required.

c) As discussed, workers are anticipated to come from within the region. The Project is consistent with the ELAP and the County General Plan with a primary Land Use designation of Very Low Density Residential. Additionally, the Project would provide a caretaker's residence as part of the Project facilities. Therefore, the Project will not 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). Impacts would be less than significant, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Riverside County General Plan, Google Earth imagery, GIS Database, General Plan Final Program Environmental Impact Report (State Clearinghouse No. 2002051143)

Findings of Fact:

The Project Site receives fire protection services from the Riverside County Fire Department (RCFD). Development of the Project Site with a cemetery that would hold religious services has the potential to increase the frequency of fire protection calls to the site.

Riverside County Fire Station 97, 41725 Rosetta Canyon Dr, Lake Elsinore, CA is located approximately 3 miles from the Project Site that can service the Project within acceptable service ratios, response times or other performance objectives.

To ensure adequate fire protection for all residents of Riverside County, the Riverside County Department of Building and Safety and the RCFD enforce fire standards as they review building plans, conduct building inspection and review structures for compliance with the California Code, including Public Resources Code Sections 4290-4299 and California Government Code Section 51178 that address fire safety and Riverside County Ordinance No. 787 (Fire Code Standards).

Although the Proposed Project's increased demand on fire services could impact the RCFD's response times, the impact under CEQA is determined to be less than significant because the Proposed Project would be served from existing RCFD fire stations and would not require the construction of a new fire station or physical alteration of an existing fire station. The Project Applicant would be required to comply with Riverside County Ordinance No. 659 (the County Development Impact Fee [DIF]), which requires a fee payment by developers for the funding of public facilities, including fire protection facilities.

Therefore, the Project will not result in substantial adverse physical impacts associated with the provision of new or physically altered fire services or facilities. Impacts would be less than significant, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

29. Sheriff Services	☐	☐	☒	☐

Source(s): Riverside County General Plan, General Plan Final Program Environmental Impact Report (State Clearinghouse No. 2002051143)

Findings of Fact:

The Project Site is located within an existing service area of the Riverside County Sherriff Department and specifically serviced by the Perris Station, located at 137 N. Perris Blvd, Suite A, Perris, CA 92570, approximately 6 miles northeast of the Project Site. In addition to the main assigned substation, the Sheriff's Department maintains routine patrols in various areas of the County to maintain acceptable service ratios and response times. The Proposed Project would result in additional on-site employees and visitors that could create the need for sheriff services. Operation of the cemetery may generate a typical range of sheriff service calls, such as burglaries, thefts, and visitor disturbances. Unincorporated Riverside County has set a minimum standard of 1.0 deputy per 1,000 residents. As discussed throughout this document, the Proposed Project would not result in an increase in residents. As such, the Project would not result in a demand for additional Sheriff's Department employees, facilities, or service levels. The Project Applicant will be required to comply with Riverside County Ordinance No. 659 (the County DIF), which requires a fee payment by developers for the funding of public facilities, including sheriff protection facilities. Therefore, the Proposed Project will not result in substantial adverse physical impacts associated with the provision of new or physically altered sheriff services or facilities. Impacts would be less than significant, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

30. Schools	☐	☐	☒	☐

Source(s): GIS database, General Plan Final Program Environmental Impact Report (State Clearinghouse No. 2002051143)

Findings of Fact:

The Project Site is located in the Val Verde Unified School District. The Proposed Project consists of a cemetery that would not directly generate students. As described previously, the Proposed Project is not anticipated to generate a new population, as the employees needed to operate the Project are anticipated to come from within the Project region. Pursuant to Government Code Section 65995 applicants shall pay developer fees to the appropriate school districts at the time building permits are issued, and payment of the adopted fees provides full and complete mitigation of school impacts. Therefore, the Project will not result in substantial adverse physical impacts associated with the provision of new or physically altered school services or facilities. Impacts would be less than significant, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

31. Libraries	☐	☐	☒	☐

Source(s): Riverside County General Plan, General Plan Final Program Environmental Impact Report (State Clearinghouse No. 2002051143)

Findings of Fact:

The Project consists of the development of a cemetery where employees are anticipated to come from within the local region. As such, there would be no increase in population where the existing area and regional libraries would need to expand personnel or physical building space to accommodate additional patrons. The Project Applicant will be required to comply with Riverside County Ordinance No. 659 (the County DIF), which requires a fee payment by developers for the funding of public facilities, including library facilities. Therefore, the Proposed Project will not result in substantial adverse physical impacts associated with the provision of new or physically altered library services or facilities. Impacts would be less than significant, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

32. Health Services	☐	☐	☒	☐

Source(s): Riverside County General Plan.

Findings of Fact:

The General Plan indicates the location of several hospitals and medical facilities all located within 5 to 10 miles of the Project Site, including medical offices and urgent care centers located

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

approximately 7 miles north in the vicinity of the SR-74 and I-215 junction. The Project can be served by existing health services within acceptable service ratios. Therefore, the Project will not result in substantial adverse physical impacts associated with the provision of new or physically altered health services or facilities. Impacts would be less than significant, and no mitigation measures are required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): GIS database, Ord. No. 460, Section 10.35 (Regulating the Division of Land – Park and Recreation Fees and Dedications), Ord. No. 659 (Establishing Development Impact Fees), Parks & Open Space Department Review.

Findings of Fact:

a) The Proposed Project consists of the development of a cemetery where employees are anticipated to come from within the region and therefore would not require new park or recreational facilities. Therefore, the Proposed Project does not propose to build a park and would not create the need for new recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Impacts would be less than significant, and no mitigation measures are required.

b) The Proposed Project consists of the development of a cemetery where employees are anticipated to come from within the region and therefore would not require new park or recreational facilities or use facilities in a manner that would cause deterioration of existing parks. The Project Applicant will be required to comply with Riverside County Ordinance No. 659 (the County DIF), which requires a fee payment by developers for the funding of public facilities, including park facilities. The Project does not increase population and will not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant, and no mitigation measures are required.

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

c) According to the County of Riverside Economic Development publicly available mapping, the Proposed Project is not located in a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees). There would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

34. Recreational Trails a) Include the construction or expansion of a trail system?	☐	☐	☒	☐

Source(s): Riverside County General Plan Figure C-6 Trails and Bikeway System, Elsinore Area Plan.

Findings of Fact:

a) An extensive system of proposed trails and bikeways exists within the ELAP planning area connecting the various neighborhoods with the recreational resources of the Cleveland National Forest and the regional trail system. The Elsinore Area Plan trail system is mapped in the ELAP, Figure 8, *Trails and Bikeway System*. A Regional Trail: Urban/Suburban is mapped on ELAP Figure 8 to traverse south and east of the Project Site's Phase 2 and Phase 3 areas. Trail spurs from the Regional Trail have been informally developed by trail users and local residents to traverse the Project Site's eastern boundary. These informal trail spurs would be abandoned (Refer to Project Figure 4B). There would be no impacts to the regional trail system because the informal spurs that would be eliminated are not part of the mapped trail system. Impacts would be less than significant, and no mitigation is required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

TRANSPORTATION Would the project:				
35. Transportation a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☒	☐
d) Cause an effect upon, or a need for new or altered maintenance of roads?	☐	☐	☒	☐
e) Cause an effect upon circulation during the project's construction?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Result in inadequate emergency access or access to nearby uses?	☐	☐	☒	☐

Source(s): Riverside County General Plan; Report by Integrated Engineering Group titled *Scoping Agreement for Traffic Impact Study*, December 11, 2023 (Appendix H).

Findings of Fact:

a) The ELAP programs and policies are supplemental to, and coordinated with, the policies of the Riverside County General Plan Circulation Element. As such, the circulation system of ELAP is tied to the countywide system and its long-range direction.

The Project Site is located at the end of Garfield Street, which is not designated as an arterial, major roadway, or secondary roadway.

The ELAP identifies applicable circulation policies to include following:

- ELAP 8.1 - Design and develop the vehicular roadway system per Figure 7, Circulation, and in accordance with the Functional Classifications and Standards section in the General Plan Circulation Element.

- ELAP 8.2 - Maintain the County's roadway Level of Service standards as described in the Level of Service section of the General Plan Circulation Element.

The Proposed Project was reviewed and approved for conformance with Riverside County Ordinance No. 461, "Road Improved Standards and Specifications" by the Riverside County Transportation Department. The Project would improve the existing terminus of Garfield Road, which is the main entry to the Project Site. The Project proposes that Garfield Road would end easterly as a cul-de-sac, west of the entry gates of Crescent Gardens cemetery, and dedicated to the County. This would include paved road curb to curb, parkway and sidewalk that support fire department vehicle turning radius requirements.

The General Plan Element identifies that Level of Service (LOS) "C" applies to all development proposals within the ELAP.

Trip generation is a measure or forecast of the number of trips that begin or end at the Project Site. The traffic generated is a function of the extent and type of development proposed for the site. These trips will result in some traffic increases on the streets where they occur. The Proposed Project is anticipated to generate a total of 90 two-way trips per day with 4 AM peak hour trips and 11 PM peak hour trips (in actual vehicles). Therefore, it is assumed that the Project would maintain a LOS C consistent with the General Plan consistent with the County's level of service standards. Impacts would be less than significant, and no mitigation is required.

The County of Riverside contains bicycle, pedestrian, and multi-purpose trails that traverse urban, rural, and natural areas. These multi-use trails serve both as a means of connecting the unique communities and activity centers throughout the County of Riverside and as an effective alternate mode of transportation. The ELAP does not identify any bicycle, pedestrian, and multi-purpose trails in the Project footprint. As identified in Criteria 34

Recreational Trails above, a regional trail exists east of the Project Site, with informal trail spurs to allow access to the Project Site. These spurs would be removed, although users would still be able to access and use the existing regional trail. Therefore, the Project is consistent with the ELAP's vision for bikeways and pedestrian facilities. Impacts would be less than significant, and no mitigation is required.

b) Senate Bill 743, adopted in 2013, added section 21099 to the Public Resources Code, which states that automobile delay, as described by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment. Essentially a project's environmental impacts can no longer focus on vehicle delay at street intersections or on roadway segments but must use the miles a vehicle must travel between a dwelling and commerce, recreation and/or work. The intent of this shift in methodology is to encourage different land use and transportation decisions to reduce greenhouse gas emission, support in-fill development and improve public health through active transportation. Section 15064.3, subdivision (b)(1) of the CEQA Guidelines requires a determination as to whether the project will result in a substantial increase in vehicle miles traveled (VMT). Riverside County adopted the *Transportation Analysis Guidelines for Level of Service, Vehicle Miles Traveled* (December 2020) to be compliant with CEQA Guidelines section 15064.3, subdivision (b) and provide screening criteria and methodology for vehicle miles traveled (VMT) analysis.

   The Vehicle Miles Traveled Screening Evaluation prepared for the Project (Appendix H) identified that the Project falls within the VMT screening criteria for "Small Project." The County VMT guidelines do not specifically address the cemetery land use. Based on the County VMT guidelines, the Project would meet the definition of a "Small Project" as it is defined as "Unless specified above, project trip generation is less than 110 trips per day per the ITE Manual or other acceptable source determined by Riverside County." Based on the project trip generation assessment, the Proposed Project is expected to generate less than 110 trips which is presumed to cause a less-than-significant impact. Therefore, the project is exempt from performing a VMT analysis because it is considered a "Small Project." Therefore, this Project will screen out from a VMT analysis, and is therefore consistent with CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant, and no mitigation is required.

c) The Proposed Project's road improvements include modifying the terminus of Garfield Road to include a cul-de-sac and transition from a public right of way to a private road within the cemetery. From the terminus of Garfield Road, the cemetery would contain a series of internal roads for the use of the cemetery patrons only. This improvement does not increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment) because the improvements are designed to County standards. Therefore, while the Project would make various street improvements, there are no geometric changes to the roadways that would create a geometric hazard or sharp curve or dangerous intersection. There would be less than significant impacts, and no mitigation is required.

d) The Proposed Project roadway modifications along Garfield do not cause an effect upon, or a need for new or altered maintenance of roads as these are existing roadways and the modifications will improve the roadway conditions by installing a cul-de-sac with a curb and gutter and pavement rehabilitation.

The Project is located in the Good Hope/Meadowbrook Environmental Justice Area. In compliance with General Plan Policy HC 15.1, outreach events have been conducted during the planning process for the Project. Additionally, the Applicant has provided a completed an Environmental Justice Form showing that the Proposed Project complies with all applicable Environmental Justice Policies as the applicant will be providing a water line estimated at $675,000 for water line with 25 residential laterals and trail estimated at $55,000.

Impacts would be less than significant, and no mitigation is required.

e) The Proposed Project would not cause an effect upon circulation during the Project's construction because all equipment and materials needed for construction would be staged within the Project Site. Construction vehicles accessing the site would be transported to the site under all State, federal and local transport regulations along the area's roadways. Impacts would be less than significant, and no mitigation is required.

f) Primary and secondary access for the Proposed Project consists of one driveway off of Garfield Road. The interior private roads of the Project Site have been designed to allow for emergency service access. And while some parking would occur along the edges of the interior roadways for graveside services, the roads are designed in a manner that would allow for emergency access. Prior to construction, the Project would be subject to review by the County's Fire and Sheriff Departments, as well as grading plan review, to assure that adequate emergency access is provided to and from the Project Site and for surrounding residents. Impacts would be less than significant, and no mitigation is required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

36. Bike Trails a) Include the construction or expansion of a bike system or bike lanes?	☐	☐	☐	☒

Source(s): Riverside County General Plan.

Findings of Fact:

a) According to the County General Plan, the Project Site is not located adjacent to or nearby any designated bike trails. The Proposed Project does not propose a bicycle trail system or bike lanes, nor is there a requirement to construct or expand any of the existing bike trail/lane systems within the Project vicinity. There would be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
TRIBAL CULTURAL RESOURCES Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:				
37. Tribal Cultural Resources a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)	☐	☒	☐	☐

Source(s): County Archaeologist, AB52 Tribal Consultation, Report by Tierra Environmental Services, titled *Cultural Resources Assessment for 23682 Water Street, Riverside County*, April 24, 2023 (Appendix C), *Advisory Notification Document, PPT220047*, County of Riverside Transportation and Land Development Agency, April 26, 2023 (on file with the County).

Findings of Fact:

a) Cultural Resources are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as cultural landscapes or sacred places.

Changes in the California Environmental Quality Act, effective July 2015, require that the County address a new category of cultural resources – tribal cultural resources – not previously included within the law's purview. Tribal Cultural Resources (TCRs) are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as cultural landscapes or sacred places. The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

In compliance with Assembly Bill 52 (AB52), notices regarding this project were mailed to all requesting tribes on February 8, 2023.

No response was received from the Colorado River Indian Tribes, Cahuilla Band of Indians, Ramona Band of Cahuilla Indians, Pala Band of Luiseño Indians or the Santa Rosa Band of Cahuilla Indians.

The following is a summary of the AB52 consultation:

Quechan Indian Tribe
The Quechan Indian Tribe Historic Preservation Officer responded in an email dated February 08, 2023 and stated that the tribe does not wish to comment on the project and deferred to more local tribes.

Agua Caliente Band of Cahuilla Indians
The Agua Caliente Band of Cahuilla Indians responded in an email dated February 09, 2023, stating that the project is not located within the Tribe's Traditional Use Area. Agua Caliente deferred to other tribes in the area.

Soboba Band of Luiseño Indians
The Soboba Band of Luiseño Indians responded in an emailed letter dated February 23, 2023, requesting consultation. The letter further stated that the tribe has identified multiple areas of potential impact. Based on the sensitive nature of the substantial information that will be disclosed by the tribe, specifics will be discussed in a confidential setting, during consultation. This project was discussed during a meeting held on January 24, 2024. Soboba told Planning that the area is very sensitive and requested a site visit. The site visit was held June 12, 2024. Soboba deferred to Pechanga and consultation was concluded verbally during the site visit.

Rincon Band of Luiseño Indians
The Rincon Band of Luiseño Indians responded in an emailed letter dated March 9, 2023 requesting consultation. Further, the letter stated that the City of Lake Elsinore is considered a Traditional Cultural Place (TCP) and Landscape (TCL) by the Rincon Band, as it is associated with the Luiseño Creation and contains numerous recorded cultural places and other TCRs. Rincon has no knowledge of cultural resources within the project area. However, that does not mean that none exist. The tribe requested archaeological records and shape files, archaeological record search results, and the grading plans. These were provided to the tribe and consultation was concluded and deferred to Pechanga on March 14, 2024.

Pechanga Band of Indians
The Pechanga Band of Indians responded in an email dated March 3, 2023. In the letter the Pechanga Tribe told Planning that "the Project area is part of 'Atáaxum (Luiseño), and therefore the Tribe's, aboriginal territory as evidenced by the existence of cultural features associated with religious practice and an extensive artifact record in the vicinity of the Project. This culturally sensitive area is affiliated with the Pechanga Band of Indians because of the Tribe's cultural ties to this area, as well as our extensive history with the Meadowbrook-region and other projects within the area."

Further, the email stated that Project is within a Traditional Cultural Property, directly adjacent to Pechanga Tribe's Reservation land, and contains a multitude of TCRs. The Tribe requests that all efforts to preserve sensitive TCRs be made as early in the development process as possible.

This project was discussed in Government-to-Government consultation with the Tribe in a meeting held January 29, 2024, February 21, 2024 and also during two site visits. The Pechanga Tribe worked very closely with the applicant throughout the CEQA process and made recommendations regarding all aspects of the development process.

Pechanga representatives have indicated on numerous occasions the extreme cultural significance of this area. Pechanga trust land is located immediately adjacent to the project area to the north and site CA-RIV-710 (P-33-000710) is located partially within the Project area, extending north beyond it. As described in the Cultural Resources section of this Initial Study and in the cultural resources technical reports prepared for the project and on file with the County, this resource is known to include cremations, ceremonial items, grave goods, and cupule-petroglyph boulders. Additionally, there are extensive midden deposits, bedrock milling features, and dense artifact concentrations. Although CA-RIV-710 has not been formally evaluated for inclusion in the National Register of Historic Places or the California Register of Historical Resources, it has been noted in reports and site records as a significant resource both archaeologically and culturally. Pechanga has identified it as a TCP/TCR.

Summary of Results:

In consultation with the Pechanga Band of Indians, the County learned of a well-documented TCR on the property, identified as the Meadowbrook Traditional Cultural Place (N-RIV-108), which was filed with the Native American Heritage Commission (NAHC) as a Sacred Lands File in 2017 by Pechanga Band of Indians. The entire project site sits within this TCR. Although site CA-RIV-710 has not been formally evaluated for inclusion in the National Register of Historic Places (NRHP) nor the California Register of Historic Places (CRHR); the County formally recognized the Tribal cultural significance of this resource, as well as its significance as an archaeological site in the early 1990s by working closely with the BLM to manage, protect, and maintain the site. The cultural importance is documented in archaeological reports that were prepared for the County and the BLM in the early 1990s and in more recent discussions with both Pechanga and Soboba. Based on this, for the purposes of this Project, the resource is treated as a TCR, eligible for the NRHP and CRHR. CA-RIV-710's archaeological boundary was updated in 2023 as part of the Phase I archaeological report that was completed for this project; however the Tribe incorporates a much larger region for the TCP boundary which includes the entire project site which is included within this TCR.

The applicant has worked diligently with Pechanga to design the Project to avoid impacts to cultural resources to the greatest extent feasible. The areas of the project site identified as the most sensitive, based on knowledge of Pechanga tribal members and elders as well as previous archaeological studies will be left in open space. Other areas of the project site will be covered with engineered-fill, such that excavation for new gravesites will be in these engineered-fill soils; not in native soils with higher potential for disturbing sensitive cultural resources. Fencing will be used to prevent access to open space areas and off-site areas of the TCR.

Although the project has been designed to avoid or minimize impacts to the TCRs as much as possible, not all impacts can be fully avoided. There is also a potential for encountering cultural material during ground-disturbing activities necessary to implement the project during the development phases. Thus, the project could have effects to previously unidentified subsurface TCRs.

The following mitigation measures have been recommended for the project to mitigate impacts to the archaeological resource and TCR that cannot be avoided through project design and to ensure that any previously unidentified artifacts or features that are identified during the grading process will be handled in a professional and culturally appropriate manner.

b) Refer to Item 39.a above. All mitigation measures and COAs previously identified would also apply to this criterion to reduce potential impacts to less than significant for the reasons previously identified.

Mitigation: Public agencies must, when feasible, avoid damaging effects to any tribal cultural resource. Pub. Res. Code § 21084.3 (a). Appropriate mitigation for a tribal cultural resource is different than mitigation for archeological resources. During the course of AB 52 consultation between the County of Riverside the Pechanga Band of Indians (Pechanga Band) identified that the CUP 230002, TPM 38623, as known as Crescent Gardens Muslim Cemetery is a part of recorded Meadowbrook Tribal Cultural Property (TCP) N-RIV-108 and therefore a Tribal Cultural Resource (TCR) has been identified. The proposed project is also located directly adjacent to Pechanga Tribe's Reservation land. Both aforementioned TCPs and TCR have been previously deemed eligible for listing on the NRHP, as well as the CRHR. The Tribes consider the Meadowbrook TCP/TCR to consist of a large village complex that spans 4.5 miles in length and 1.3 miles width in the community of Meadowbrook with at least three separate ceremonial/religious areas within the TCR, two of which have recorded burial/cremation locations that are associated, along with multiple domestic activity areas containing bedrock mortars and slicks, rock art in the form of pictographs and cupules, ceremonial areas, and other features that represent everyday activities of 'Atáaxum (The People) culture. The TCR fully encompasses the 84.99 gross acres proposed CUP 230002, TPM 38623 Crescent Gardens Muslim Cemetery Project, and as such all tangible and intangible natural and cultural sites, geologic features, water resource features, and native plants traditionally used by the Pechanga Band of Indians are contributing elements of the TCR.

TCR - 1 The Pechanga Band requests avoidance to the greatest extent possible, of the most significant places within the TCR, namely CA-RIV-710 as they are elements of the larger TCRs identified by the tribes during consultation. The currently designed project avoids all known significant areas; however, additional areas of interest may be exposed during the grading operations of each phase of the project. Therefore, if significant archaeological sites, geologic features, or water resource features are identified during grading operations, these shall be avoided to the extent feasible through re-design in consultation with the Pechanga Band of Indians.

TCR-2 **Preparation of a Tribal Cultural Resource Management Plan (TCRMP)**. The TCRMP shall be prepared by the developer in close consultation with the Pechanga Band, to manage the impacts to the tangible cultural and natural resources identified in the project area and will outline in detail how the Tribal mitigation shall be implemented in a manner that respects Tribal cultural values. The TCRMP will be developed prior to grading permit issuance and approved by the County of Riverside after the Pechanga Band of Indians have fully reviewed and provided all edits. The TCRMP will function like a cultural resources management plan (CRMP), but will consider the TCRs as defined by California Public Resources Code Section 21074(a) and will be used as a guide to identify, protect, and manage the tangible and intangible TCRs already present on site

and those inadvertently identified within the project area, and ensure that impacts to these resources are minimized or avoided during project implementation.

The TCRMP will include protection protocols to safeguard the known TCRs during construction and throughout the life of the project. This will include but is not limited to:

- Incorporating an exhibit that details and identifies the tangible components of the TCR that encompasses the project area (i.e., features, natural resources, sites, preservation areas).
- The development of buffer zones and exclusion areas around sensitive sites, as determined in consultation with the Pechanga Band, to ensure that the avoided resources are not disturbed by construction activities. The proposed development plan incorporates buffer zones around known significant areas, developed in consultation with the Pechanga Band over a period of several years. Buffer zones for newly identified resources may be mutually addressed based on inadvertent discoveries. (TCR-1, TCR-6, TCR-8)
- Temporary protection measures during construction for Tribal Ceremonial Areas, such as restricted access to areas of spiritual or ceremonial importance by equipment and personnel and respecting seasonal and cultural significance of the land use. The areas of temporary protections may change depending on weather conditions and the areas of work. (TCR-4, TCR-6)

In addition, the TCRMP will specify the process for the following:

- Preconstruction meeting requirements and monthly check in meetings
- Cultural resources monitoring during construction and other ground-disturbing activities.
- Phasing Plan and Map
- Grading Schedule and Timeline based on Phasing Map
- Avoidance Plan
- Relocation Plan
- Fencing Plan
- Control Grading Plan
- Inadvertent Finds
- Inadvertent Findings of Human Remains
- Photo Recordation of Inadvertent Features
- Final Disposition of Inadvertently found Tribal Resources
- The development process of a long-term management plan to ensure the protection of TCRs beyond the ground disturbing and construction phase of the project
- Roles and Responsibilities and contact information for all parties
- Mitigation Measures for Tribal Cultural Resources will be listed within the TCRMP for reference

The Pechanga Band will co-manage the TCRMP with the landowner, Management Company , environmental agency such as RCA or other Conservation Easement Holder or Grantee.. CRMPs traditionally only address tangible archaeological and historical resources that are eligible for listing in the CRHR. A TCRMP is required for this Project

because the identified TCR can only be defined by the Pechanga Band, which includes places, sites, features, sacred places, and objects that have cultural significance, as well as archaeological resources.

TCR – 3 **Tribal Monitoring Agreements.** The developer/Land Owner is required to enter into Agreements with the Pechanga Band of Indians for Tribal monitoring of the project. The agreements shall be in place prior to issuance of a grading permit. To accomplish this, the applicant should contact the Tribes no less than 30 days and no more than 60 days prior to issuance of a grading permit. This Agreement will address the treatment and disposition of Tribal cultural resources, the designation, responsibilities, and participation of Tribal monitors during grading, excavation and ground disturbing activities; project grading and development scheduling; terms of compensation for the monitors; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered onsite. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist. Tribal Monitors shall be allowed to monitor all grading, excavation, and groundbreaking activities associated with the project development and shall not monitor the excavation of individual graves in engineered fill soils associated with cemetery operations.

TCR – 4 **Environmentally Sensitive Areas (ESA).** Prior to the start of ground-disturbing activities, all Tribal features shall be fenced off with construction fencing and identified as ESAs to ensure Project personnel do not disturb the features. The installation of the ESA fencing shall be monitored by the project archeologist and Tribal Monitors. Specific requirements pertaining to the avoidance buffer, style, materials, access, maintenance, and other requirements shall be provided within the TCRMP.

TCR – 5 **Pre-grade Surface Collection.** Prior to the start of any ground-disturbing activity in any phase of the project, the Native American and archaeological Monitors shall conduct a surface collection of artifacts within that phase that would be subject to impacts from ground disturbance. The archaeological monitor will record all surface collected resources using GPS to record resource location and all relevant documentation for DPR site record updates. The artifacts/cultural material will be temporarily kept on site in a secure location until such time as they are reburied in a location agreed upon by the Pechanga Band of Indians, and the project applicant/developer.

TCR – 6 **Avoidance Plan.** Prior to issuance of a grading permit, an avoidance plan shall be prepared by the developer in consultation with the Pechanga Band of Indians. The avoidance plan is to formalize the avoidance areas with their buffer zones and how work shall proceed around them, inspections of protective fencing, protection measures should individual features need them, and how temporary avoidance area protocols shall be carried out. This plan shall indicate the areas/locations of the features that will be avoided by this project and the protection measures to be implemented during construction. In addition, the locations will be designated, in consultation with the Pechanga Band of Indians, on a confidential map. The developer/applicant shall provide evidence to the Riverside County Planning Department that the map has been included in the Grading Plans, and shall indicate the presence of environmentally constrained area(s) and the requirements for avoidance of portions of CA-RIV-710.

TCR – 7 **Relocation of Cultural Features.** Prior to the start of ground-disturbing activities, all impacted features recommended for relocation shall be temporarily fenced off with construction fencing and identified as ESAs to ensure project personnel does not disturb the features. The installation of the ESA fencing shall be monitored by the project archaeologist and Tribal monitors. Once the final location of the features has been determined and the area prepped, the features are to be moved to their final resting location. The features are only to be moved once. If the feature(s) do not survive the relocation efforts in one piece, all feasible fragments will be relocated to the final location. The relocation area shall be preserved in perpetuity and protected from all future ground-disturbing activity via an enforceable legal instrument such as a conservation easement or other restrictive binding upon successive owners of the relocation area.

TCR – 8 **Environmentally Sensitive Open Space Areas- Avoidance Mitigation for CA-RIV-710.** Portions of site CA-RIV-710 will be avoided by the Project design. For purposes of preserving this site in perpetuity, the Project Applicant will record a restrictive covenant, or similar legal restriction, over the preservation portion of site CA-RIV-710 prior to the issuance of any grading permits for the Project.

The Project Applicant, in consultation with the Project Archaeologist, County of Riverside, grading contractor, and the Pechanga Band of Indians, will create an exhibit for the placement of a temporary construction fence, around the preservation portion of site CA-RIV-710. Permanent fencing around the preservation portion of site CA-RIV-710 will be installed in accordance with and in conformance to the Project's fencing plan. Future maintenance and upkeep of the fencing will be the responsibility of the Crescent Gardens Mortuary.

TCR – 9 **Controlled Grading and Grubbing.** All grading shall be controlled in areas around identified Tribal Cultural Resources, such as cultural features or cultural areas of concern, including but not limited to all impacted areas within CA-RIV- 710 and as determined by the Pechanga Band of Indians. The identified areas shall be inspected by the Principal Investigator/Archaeologist and Pechanga Tribal monitor(s) prior to initiating grading for each area. Grading shall be controlled within the Environmentally Sensitive Buffer Area using a slope board or similar equipment to allow soil to be removed in increments of only a few inches at a time. Other areas that may require controlled grading shall be determined by the Principal Investigator/Archaeologist and the Pechanga Tribal monitor(s) based on the results and soil types identified during grading. Should any changes be needed, an updated exhibit will be produced and approved by all parties prior to any ground disturbance in the newly identified area.

TCR-10 **Inadvertent Finds.** Avoidance and preservation in place is the preferred method for all Tribal Cultural Resources inadvertently discovered during the course of ground disturbing activities. If avoidance and preservation is not feasible, a feasibility study shall be required for final determination regarding the need for avoidance. If the County determines that the study has adequately demonstrated that preservation is not feasible, a Data Recovery/Treatment Plan for the resource shall be drafted in consultation with the Pechanga Band, and subject to review and approval by the County of Riverside prior to implementation and recommencement of ground disturbing activities.

If Tribal cultural resources are discovered during ground disturbance activities that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, the following procedures shall be followed. Treatment of tribal cultural resources inadvertently discovered during the project's ground-disturbing activities shall be subject to the consultation process required by state law and AB 52.

i. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the Project Applicant, the Project Archaeologist, the Tribal Representative(s), and the County to discuss the significance of the find.

ii. At the meeting, the significance of the discoveries shall be discussed and after consultation with the Tribal Representative(s) and the Project Archaeologist, a decision shall be made, with the concurrence of the County, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.

iii. Further ground disturbance, including but not limited to grading, trenching etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal Monitors if needed.

iv. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design to the extent feasible, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/Mitigation Measures.

v. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the County for their review and approval prior to implementation of the said plan.

vi. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the Project Applicant and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the County of Riverside for decision. The County shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist, and shall consider the cultural and religious principles and practices of the Tribe. Notwithstanding any other rights available under the law, the decision of the County shall be appealable to the County Planning Commission and Historical Commission.

vii. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment finding.

TCR – 11 **Human Remains.** If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the "most likely descendant". The "most likely descendant" shall then make recommendations, and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). (GP Objective 23.3, CEQA).

TCR - 12 **Final Disposition.** Tangible cultural resources within the TCR inadvertently discovered during ground disturbing activities, as well as previously identified features that are not of ceremonial nature, which cannot remain in their existing location, shall be relocated to multiple mutually agreed upon areas within the 84.99-acre Project Area. These areas will be identified and described within the TCRMP and the CRMP as open space preservation areas, that will be preserved in perpetuity so that no future disturbances will occur.

In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries: a) One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the County of Riverside:

i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.

ii. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods, and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to Public Records Request.

TCR–13 **Preservation and Maintenance Plan.** Prior to Occupancy Permit Issuance, the landowner and the Pechanga Tribe shall develop a Preservation and Maintenance Plan for the long-term care and management of CA-RIV- 710 and any additional areas that may be included as mitigation for inadvertently found cultural sites. The plan shall indicate at a minimum, the specific areas to be included in and excluded for long-term maintenance, prohibited activities, methods of preservation to be employed, measures for stabilization of the relocated resources, security and long-term preservation, the party

responsible for the long-term maintenance, appropriate protocols and necessary emergency protocols. The plan shall also identify areas of Tribal access for Cultural and educational purposes. The plan shall be developed in consultation with the Pechanga Band, and subject to review and approval by the County of Riverside. The project applicant/landowner shall submit a fully executed copy of the preservation and maintenance plan to the County of Riverside and the Pechanga Band of Indians.

TCR – 14 **Reburial area.** Prior to issuance of grading permits: the developer/ applicant, in consultation with the Pechanga Band of Indians, shall provide evidence to the Riverside County Planning Department that a Reburial Area(s) have been identified and an Environmental Constraints Sheet has been included in the Grading Plans. This sheet shall indicate an area that will be used for reburial of any artifacts that have been identified during grading and cannot be avoided. This area will be protected and not disturbed in the future. This is confidential information, and the exact nature of this area will not be called out on the grading plans.

TCR-15 **Non-Disclosure.** It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 7927.000, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 7927.000.

TCR- 16 **Tribal Notification for Annual Fuel Modification Maintenance.** The Pechanga Band of Indians understands that the Project will be required to have fuel modification maintenance on an annual or biannual basis by the County of Riverside Fire Marshall.

The Project applicant shall notify the Pechanga Band of Indians for all such required work by the County Fire Marshall in all open space areas within the Project.

TCR-17 **Phase IV Report.** Prior to final inspection, the Project Archaeologist is to submit two (2) copies of the Phase IV Monitoring Report that addresses Cultural and Tribal Cultural Resources and complies with the Planning Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Planning Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Planning Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the South Coastal Information Center (SCIC) at San Diego State University (SDSU) and one (1) copy shall be submitted to the Pechanga Cultural Resources Department.

In addition to the mitigation measures detailed in this section, see also the mitigation measures detailed in the Cultural Resources section of this Initial Study.

Monitoring: Monitoring will be conducted by qualified archaeologists and tribal representatives as identified in the Mitigation Measures and COAs.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS Would the project:				
38. Water a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐

Source(s): Project Application Materials; letter by Elsinore Valley Municipal Water District, *Mortuary & Cemetery (WO# 22-125)*, dated January 16, 2023 (Appendix I).

a) Domestic water service for the Project area is provided by the EVMWD. The EVMWD issued a "will serve" letter to the Project Applicant dated January 16, 2023 indicating that the EVMWD has capacity to provide water service to the Proposed Project within EVMWD's existing facility abilities. However, to receive water service the Project would replace approximately 2,810 linear feet of existing 4-inch water line with an 8-inch water line to that will be extended from the Project Site at Garfield Road, extending to Jarvis Street, then north along Jarvis Street, and to a point of connection near Senola Avenue per EVMWD. The replacement water line would occur in the same location as the existing waterline, which is in road right-of-way.

Because the Proposed Project's connection to EVMWD's existing water facilities would occur within existing roadways and rights of way and stormwater will be contained on site, the Project does not require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects.

The Project is outside of EVMWD's sewer service area. As such, the Project would construct an on-site septic system that would not require EVMWD to construct new, or upgrade existing facilities. Impacts would be less than significant. Impacts would be less than significant.

b) Approximate water usage is anticipated as follows: Chapel would use approximately 2,400 gpd; the Ceremonial Cleansing Facility will utilize approximately 670 gpd; Caretaker Residence will utilize approximately 500 gpd; and overall irrigation would utilize approximately 14,200 gpd over entire site. The total projected water demand would be approximately 17,770 gpd after complete buildout of the project. This estimate is subject to further water hydraulic analysis during final engineering process and is estimated for the life of the project 15-20 years. The EVMWD reviewed the Proposed Project's water needs in light of Project water demands in its Urban Water Management Plan and issued a "will serve" letter to the Project Applicant for domestic water service on January 16, 2023. Therefore, there are sufficient water supplies available to serve the Proposed Project and

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

reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

39. Sewer a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?	☐	☐	☒	☐
b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒

Source(s): Department of Environmental Health Review; letter by Elsinore Valley Municipal Water District, *Mortuary & Cemetery (WO# 22-125)*, dated January 16, 2023 (Appendix I).

a) Municipal sewer infrastructure does not exist in the Project vicinity, according to the EVMWD and the County maps. Therefore, the Project would install a septic system on site to serve employees and visitors and is designed such that each building would have its own individual septic system. The Project's soils have been identified as suitable for construction of the septic system, and the system would be sized in accordance with County regulations. Therefore, while the Proposed Project would require or result in the construction of a new wastewater treatment facilities, which is a septic system, the construction or relocation would not cause significant environmental effects because it would be constructed to County standards. Impacts would be less than significant, and no mitigation is required.

b) Municipal sewer infrastructure does not exist in the Project vicinity, according to the EVMWD and the County maps. The Proposed Project would install its own on-site sewer treatment system. Therefore, the Proposed Project will not result in a determination by the wastewater treatment provider that serves the project that it has adequate capacity to serve the projected demand in addition to the provider's existing commitments. There would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
40. Solid Waste a) 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?	☐	☐	☒	☐
b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	☐	☐	☒	☐

Source(s): Riverside County General Plan.

a) Solid waste generated within the planning area is primarily transferred to the El Sobrante Landfill, located approximately 12 miles north of the Project Site and is permitted to accept 16,054 tons per day and has a remaining capacity of 143,977,170 tons, through 2051. However, the County's waste hauler can also use other County landfills in the area such as the Lamb Canyon Landfill. All Riverside County landfills are Class III disposal sites permitted to receive non-hazardous municipal solid waste. Waste Management of Inland Empire currently provides waste pickup in Project area. The intention of the goals, policies, and land use map of the County's General Plan is that the Project Site and surrounding parcels be used for residential and other permitted purposes. The Proposed Project is consistent with the designated land use, and waste generated has therefore been accounted for in the County's long-range plans for waste management and landfill capacity. As such, the County's solid waste handling infrastructure has sufficient capacity to serve solid waste generated by the Proposed Project.

   The Proposed Project would generate construction waste during building construction, and general solid waste during operations. As noted above, the Proposed Project's waste generation would be handled by the local waste hauler and sufficient capacity would exist at the local County landfills. Therefore, the Project will not generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant, and no mitigation is required.

b) The Countywide Integrated Waste Management Plan (CIWMP) was prepared in accordance with the California Integrated Waste Management Act of 1989, Chapter 1095 (AB 939). AB 939 requires each of the cities and unincorporated portions of counties throughout the state to divert a minimum of 25% by 1995 and 50% of the solid waste landfilled by the year 2000. Riverside County reports to the State indicate that the County is in compliance with the AB 939 goals. The County's private waste hauler provides contractors separate bins where construction waste can be separated for disposal from regular trash, which is typically required by waste haulers for construction projects to ensure proper recycling and disposal of construction debris. During operations, the Proposed Project would be required to comply with the County's recycling regulations where separate bins for recyclable materials will be placed and handled separately by the waste hauler. Therefore, the Proposed Project will comply with federal, state, and local management and reduction statutes and regulations related to solid waste including the CIWMP. Impacts would be less than significant.

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

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

41. Utilities

Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

a) Electricity?	☐	☐	☒	☐
b) Natural gas?	☐	☐	☐	☒
c) Communications systems?	☐	☐	☒	☐
d) Street lighting?	☐	☐	☒	☐
e) Maintenance of public facilities, including roads?	☐	☐	☒	☐
f) Other governmental services?	☐	☐	☐	☒

Source(s): Project Application Materials, Utility Companies, Appendix I.

a) Electricity: Development of the Proposed Project would cause a permanent increase in demand for electricity when compared to existing conditions. Information from the CalEEMod 2022 emission output tables for the Proposed Project (Appendix A) was utilized to generate estimates of the Project's electricity, natural gas, and fuel consumption for construction and operational aspects of the Project. Electricity used for the Project during construction and operations would be provided by Southern California Edison (SCE), which serves more than 15 million customers. The increased demand is expected to be sufficiently served by existing SCE electrical facilities. There are currently overhead power lines and related easements on Garfield Street. All of these lines will remain overhead, and no new power lines are required to serve the Project. Impacts would be less than significant, and no mitigation is required.

b) Natural Gas: The Project is designed to solely rely on electricity for all services, and no natural gas would be used. There would be no impact on natural gas services and no mitigation is required.

c) Communications Systems: Existing overhead telephone and cable TV cables would remain in their current location on overhead poles along Garfield Street to serve the Project, and no new poles or facilities are required to be constructed, except at the terminus of Garfield Street where facilities would be brought to the site buildings for service. Impacts would be less than significant, and no mitigation is required.

d) Street Lighting: The County may require street lighting on Garfield near the Project driveway as a standard condition of approval. The streetlights would be consistent with the County of Riverside standards. Impacts would be less than significant and no mitigation is required.

e) Public Facilities: Garfield Street would be modified to include a cul-de-sac and would include new curb and gutter and sidewalk. The improvements would be dedicated to the County to facilitate these improvements to public facilities. These features would be maintained by the County, but they will be designed and constructed to County standards

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

which facilitates proper maintenance. Impacts would be less than significant, and no mitigation is required.

f) Government Services: There will be no government services that need to be constructed as part of, or to serve the Proposed Project. There would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

WILDFIRE If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:				
42. Wildfire Impacts a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Source(s): 2019 Riverside County General Plan Figure S-11 "Wildfire Susceptibility", GIS database, Project Application Materials.

a) The California Fire Hazard Severity Zone Mapping, the County of Riverside GIS database, and the County General Plan Figures show that the Project Site is within a Very High/High/Moderate Fire Hazard Severity Zone (FHSZ). The County of Riverside utilizes a Multi-Jurisdictional Local Hazard Mitigation Plan that identifies risks by natural and human-made disasters and ways to minimize the damage from those disasters.

During construction, all activities will occur on the Project Site. Road improvements to Garfield may temporarily block full access to the Project Site, but such closures would be in accordance with all local and State guidelines to allow for emergency access. For Proposed Project operations, the Riverside County Department of Building and Safety and the RCFD enforce fire standards as they review building plans and conduct building inspections. This includes a review for compliance with Riverside County Ordinance No. 787, which requires, among other measures, the County to review all future building plans to ensure that every building is positioned in a way that allows adequate access for emergency. Therefore, impacts would be less than significant, and no mitigation is required.

b) The Project area is composed of flat to rolling hills, with slope angles between less than 15 percent and 15 to 25 percent with rock outcroppings, according to Figure 13 of the ELAP. The 2019 Riverside County General Plan Figure S-11 classifies the wildfire susceptibility rating for the site as “High” to “Moderate.”

Construction

While the Project Site is identified as being within a high fire risk area and consists of native vegetation and rocks and boulders. The National Weather Service issues Red Flag Warnings & Fire Weather Watches to alert fire departments of the onset, or possible onset, of critical weather and dry conditions that could lead to rapid or dramatic increases in wildfire activity.

A Red Flag Warning is issued for weather events which may result in extreme fire behavior that will occur within 24 hours. A Fire Weather Watch is issued when weather conditions could exist in the next 12-72 hours. A Red Flag Warning is the highest alert. During these times extreme caution is urged by all residents, because a simple spark can cause a major wildfire. A Fire Weather Watch is one level below a warning, but fire danger is still high.

The contractor must submit a fire safety practices and procedures document for welding and the use of various equipment, consistent with OSHA General Industry Standards. The procedures must include procedures for routinely checking weather reports, requiring fire suppression equipment to be functional and maintained on site at all times, emergency procedures, and the protocol for suspension of welding operations, outside of a partially or fully constructed building, when a Red Flag warning has been issued by the National Weather Service.

Operations

The Project is subject to compliance with the 2023 California Building Code (or the most current version) and the 2022 edition of the California Fire Code (Part 9 of Title 24 of the California Code of Regulations, or most current version). Compliance with these regulations would reduce impacts of wildlife risks to Project occupants including, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The Project would develop a cemetery that would contain irrigated lands, which would reduce the potential for wildfire spread. Additionally, the Project landscaping has been designed in accordance with Riverside County fuel modification zone requirements (refer to Appendix J – Project Plans, Sheets FM-1 and FM-2 located at the end of the plan set). Impacts would be less than significant, and no mitigation is required.

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

c) Implementation of the Proposed Project would not 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. Impacts would be less than significant, and no mitigation is required.

d) The Project Site is within a High Fire Hazard Severity Zone and there is no indication of landslides, slumps, rock fall hazard, debris flow or slope instability surrounding the Project Site. As the Project Site would develop a cemetery with interior roads and irrigated vegetation, wildfire hazards are not anticipated to occur. The Project would not expose people or structures to downslope flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, there would be no impacts.

e) The Project Site is within a High Fire Hazard Severity Zone. The Project would be constructed to comply with the 2023 California Building Code (or the most current version) and the 2020 edition of the California Fire Code (Part 9 of Title 24 of the California Code of Regulations). Additionally, a Fuel Modification Plan has been developed as part of the landscape plan that identifies fire-resistant plants and irrigation near the buildings. Therefore, the Project would not expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant, and no mitigation would be required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required. None.

MANDATORY FINDINGS OF SIGNIFICANCE Does the Project:				
43. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Source(s): Staff Review, Project Application Materials

Findings of Fact:

The Project Site is vacant, contains one drainage, and complies with the Western Riverside Multiple Species Habitat Conservation Plan. Portions of the Project Site were identified to contain suitable habitat and one individual of the Crotch's Bumble Bee, a candidate species for protection under CESA. Implementation of **Mitigation Measure BIO-3** would reduce impacts through surveys and coordination with CDFW. The Project Site also contains suitable habitat for burrowing owl and nesting birds, although none were identified on site. However, implementation of **Mitigation Measure BIO-2** and **BIO-4** would

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

reduce potential impacts to burrowing owl and nesting birds during construction by conducting a pre-construction survey and implementing the appropriate mitigation measures, if found. Implementation of **Mitigation Measure BIO-1** would also reduce potential impacts to riverine/riparian resources on site. Therefore, with the implementation of mitigation measures, the Project would not 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.

The portion of Project Site slated for development does contain examples of the major periods of California history or prehistory. Implementation of the **Mitigation Measures as identified in Item 8 and 9** of this document will manage discoveries through implementation of extensive monitoring, reporting and inspection required procedures to reduce impacts to potential cultural resources and will reduce impacts to less than significant levels.

Thus, the Proposed Project will not 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, reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Therefore, impacts are less than significant with mitigation incorporated.

44. Have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?	☐	☐	☒	☐

Source(s): Staff Review, Project Application Materials

Findings of Fact: The environmental analysis conducted in this Initial Study determined that the Proposed Project is consistent with the County's General Plan land use and zoning projections. The land use has been considered with overall County growth. The analysis demonstrated that the Project is in compliance with federal, State, and County applicable regulations. There are no other projects planned for the Project vicinity that would be considered cumulatively considerable. Therefore, the Project would not create impacts, that considered with the effects of other past, present, and probable future projects, would be cumulatively considerable because Project impacts were either determined to have no impact or to be less than significant.

45. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Source(s): Staff Review, Project Application Materials

Findings of Fact: The Project is required to comply with a number of Project-specific mitigation measures that are identified throughout this document to ensure that the Project's environmental effects

will have a less than significant effects on human beings, either directly or indirectly. These mitigation measures are summarized as follows:

Therefore, with mitigation incorporated, the Proposed Project would not directly or indirectly cause substantial adverse effects on human beings.

IV. EARLIER ANALYSES

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration as per California Code of Regulations, Section 15063 (c) (3) (D). There was no earlier analyses, therefore, this is not applicable.

LIST OF APPENDICES

Appendix A	*California Emissions Estimator Model (CalEEMod) version 2022.1 outputs,* dated 12/20/24
Appendix B-1	*Crescent Cemetery, Conditional Use Permit CUP 230002, Habitat Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis,* July 2024, prepared by ELMT Consulting
Appendix B-2	*Crescent Cemetery, Conditional Use Permit CUP 230002, Delineation of State and Federal Jurisdictional Waters,* March 2024, prepared by ELMT Consulting
Appendix B-3	*Determination of Biologically Equivalent or Superior Preservation Report, Crescent Garden Cemetery*, July 2024, updated October 2024, prepared by ELMT Consulting
Appendix B-4	*2024 Proposed Crescent Gardens Cemetery Project Crotch's Bumble Bee Summary Report*, Riverside County, California, August 22, 2024, prepared by Huffman Environmental, LLC
Appendix C-1	*Historical/Archaeological Resources Survey Report, Crescent Garden Mortuary and Cemetery Project*, December 14, 2023, revised June 23, 2024, prepared by CRM Tech (confidential, on file with the County of Riverside).
Appendix C-2	*Crescent Gardens Cemetery, Cultural Resources Phase II Testing Report, PDA8402/CUP230002*, July 2024 prepared by Helix Environmental Planning (confidential, on file with the County of Riverside).
Appendix D-1	*Geotechnical Exploration and Infiltration Testing, Proposed Crescent Gardens Cemetery, East of the Intersection of Garfield Street and Roberts Street*, March 11, 2024, prepared by Leighton, Inc
Appendix D-2	*Percolation Feasibility Study Report, Conditional Use Permit 23002 Proposed Garden Cemetery,* prepared by Lakeshore Engineering, October 15, 2024
Appendix D-3	*Paleontological Resources Assessment Report, Crescent Gardens Cemetery Project*, August 28, 2023, prepared by CRM Tech
Appendix E	*Phase 1 Environmental Site Assessment of Proposed Crescent Gardens Cemetery, Meadowbrook Community,* January 2021, prepared by Environmental Managers & Auditors, Inc
Appendix F-1	*Preliminary Hydrology Report for Crescent Gardens Cemetery*, January 2025, prepared by Hunsaker & Associates Irvine Inc
Appendix F-2	*Preliminary Water Quality Management Plan, Crescent Gardens Cemetery,* March 13, 2024, prepared by Hunsaker & Associates
Appendix G	*Crescent Gardens Cemetery, Noise Impact Analysis*, May 16, 2024, prepared by MD Acoustics

Appendix H	*Scoping Agreement for Traffic Impact Study*, December 11, 2023, prepared by Integrated Engineering Group
Appendix I	Will Serve Letters from Utilities
Appendix J	Project Plans

LIST OF EXHIBITS

Figure 1: Regional and Project Vicinity Map
Figure 2A: Project Site Parcels
Figure 2B: Project Zoning and Land Use
Figure 3: Project Site - USGS View
Figure 4A: Phasing Plan
Figure 4B: Open and Developed Areas
Figure 5A: Building Elevations and Profiles – Sheet 1
Figure 5B: Building Elevations and Profiles-Sheet 2
Figure 6A: Architectural Rendering - Site
Figure 6B: Architectural Rendering – CCF and Entry
Figure 6C: Architectural Rendering - Chapel
Figure 7: Photometric Analysis
Figure 8A: Landscape Plan
Figure 8B: Typical Burial Section
Figure 9: On-Site Slope Topography
Figure 10: Environmental Justice Communities
Figure 11: DBESP and Crotch Bumble Mitigation Area

SUMMARY OF MITIGATION MEASURES (*DRAFT-TO BE FINALIZED WITH COUNTY COMMENTS ON DRAFT INITIAL STUDY)*

Mitigation Measure	Monitoring Method
BIO-1: Riverine/Riparian Habitat: Mitigation for the loss of 0.036-acre of riparian/riverine habitat within Drainage 1 would occur as a conservation easement to be placed over the 0.894 acre remainder of Drainage 1 as identified in the DBESP. A Habitat Mitigation Monitoring and Reporting Program (HMMP) must be submitted to Riverside County Planning for review. The HMMP would identify how the applicant would maintain and manage the 0.894 acre area. Activities may include but not be limited to removal of extensive invasive species, such as Tree of Heaven throughout the 0.894 acre area. Work can be performed by a third-party or by trained maintenance staff with the oversight of a biologist.	A qualified biologist will conduct the pre-construction surveys as identified in the mitigation measure.
BIO-2: BUOW Avoidance and Minimization: A preconstruction survey shall be conducted within 30 days prior to ground disturbance to avoid direct take of burrowing owls. If burrowing owls are found to be present or nesting on-site during the preconstruction survey, then the following recommendations must be adhered to: Exclusion and relocation activities may not occur during the breeding season, which is defined as March 1 through August 31, with the following exception: From March 1 through March 15 and from August 1 through August 31 exclusion and relocation activities may take place if it is proven to the County and appropriate regulatory agencies (if any) that egg laying or chick rearing is not taking place. Any relocation activities cannot occur without first consulting with the CDFW, and any relocation would be conducted in accordance with the conditions set forth by the CDFW. The pre-construction survey must be conducted by a qualified biologist; any relocation activities would be undertaken by a qualified biologist as approved by the CDFW.	A qualified biologist will conduct the pre-construction surveys as identified in the mitigation measure.
BIO-3 Crotch's Bumble Bee: The Project will occur in phases, and this measure will apply to each phase. If the Crotch's bumble bee is no longer a candidate or listed species under the	

Mitigation Measure	Monitoring Method
California ESA at the time ground-disturbing activities, then no additional protection measures are proposed for this species. The Project Proponent shall not undertake Project activities within suitable habitat until appropriate authorization (i.e., California Endangered Species Act (CESA) Incidental Take Permit (ITP) under Fish and Game Code §2081) is obtained. The ITP for Phase 1 will include but not be limited to mitigation for 1.67 acres of habitat loss which may include but not be limited to 0.45 acre of suitable habitat that is located within the 0.89 acre area conserved under BIO-1. Additional acreage may be required in accordance with the ITP. This measure does not apply to work occurring in habitat that is not suitable for the species in any phase.	
BIO-4: Migratory Bird Avoidance and Minimization. Bird nesting season generally extends from February 1 through September 15 in southern California and specifically, April 15 through August 31 for migratory passerine birds. To avoid impacts to nesting birds (common and special status) during the nesting season, a qualified Avian Biologist shall conduct pre-construction Nesting Bird Surveys (NBS) at least three (3) days prior to project-related disturbance to nestable vegetation to identify any active nests. If no active nests are found, no further action is required. If an active nest is found, the qualified Avian Biologist shall set appropriate no-work buffers around the nest which will be based upon the nesting species, based on the individual species type, its sensitivity to disturbance, nesting stage and expected types of nest, and the intensity and duration of disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.	
60-Planning-CUL. 2 Inadvertent Discoveries: Historic Period Cultural Resources. If previously	

Mitigation Measure	Monitoring Method
unknown historic-period cultural resources are discovered on the project site, work shall be temporarily halted within 60 feet of the discovery, and the resources shall be evaluated by the Project Archaeologist and the Consulting Tribes in consultation with County staff. If historic archaeological material associated with the previously identified historic-period archaeological sites is encountered, cultural features will be documented, and diagnostic artifacts will be collected before ground-disturbing activities resume within 60 feet of the discoveries. This language shall be included in the Cultural Resources Monitoring Plan.	
70-Planning-CUL. 2 Artifact Disposition: Historic Resources: Prior to Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery. Historic Resources- all historic archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County.	
60-Planning-CUL. 1 ECS Sheet Resource Reburial Area. Prior to issuance of grading permits: the developer/ applicant shall provide evidence to the Riverside County Planning Department that an Environmental Constraints Sheet has been included in the Grading Plans.	

Mitigation Measure	Monitoring Method
This sheet shall indicate an area that will be used for reburial of any artifacts that have been identified during grading and cannot be avoided. This area will be protected and not disturbed in the future. This is confidential information, and the exact nature of this area will not be called out on the grading plans.	
60-Planning-CUL. 3 Inadvertent Finds. Avoidance and preservation in place is the preferred method for all Tribal Cultural Resources inadvertently discovered during the course of ground disturbing activities. If avoidance and preservation is not feasible, a feasibility study shall be required for final determination regarding the need for avoidance. If the County determines that the study has adequately demonstrated that preservation is not feasible, a Data Recovery/Treatment Plan for the resource shall be drafted in consultation with the Pechanga Band, and subject to review and approval by the County of Riverside prior to implementation and recommencement of ground disturbing activities. If Tribal cultural resources are discovered during ground disturbance activities that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, the following procedures shall be followed. Treatment of tribal cultural resources inadvertently discovered during the project's ground-disturbing activities shall be subject to the consultation process required by state law and AB 52. i. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the Project Applicant, the Project Archaeologist, the Tribal Representative(s), and the County to discuss the significance of the find. ii. At the meeting, the significance of the discoveries shall be discussed and after consultation with the Tribal Representative(s) and the Project Archaeologist, a decision shall be made, with the concurrence of the County, as to the appropriate mitigation	

Mitigation Measure	Monitoring Method
(documentation, recovery, avoidance, etc.) for the cultural resources. iii. Further ground disturbance, including but not limited to grading, trenching etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal Monitors if needed. iv. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design to the extent feasible, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/Mitigation Measures. v. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the County for their review and approval prior to implementation of the said plan. vi. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the Project Applicant and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the County of Riverside for decision. The County shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist, and shall consider the cultural and religious	

Mitigation Measure	Monitoring Method
principles and practices of the Tribe. Notwithstanding any other rights available under the law, the decision of the County shall be appealable to the County Planning Commission and Historical Commission. vii. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment finding.	
60-Planning-CUL. 4 Native American Monitor. Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with Pechanga for a Native American Monitor. The Native American Monitor shall be on-site during all ground-disturbing activities for development of the project, including clearing, grubbing, tree removals, grading and trenching, removal of existing structural remains and infrastructure, and over-excavation for Phases 1, 2, and 3 of project development. In conjunction with the Archaeological Monitor, the Native American Monitor 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 condition of approval. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure. No monitor will be required post phased development and during the Cemetery operations due to the reasons listed below. a) The project has been designed to avoid impacts on known significant archaeological/cultural resource (i.e., historical resource per CEQA), P-33-000710 (CA-RIV-710), to the extent feasible.	

Mitigation Measure	Monitoring Method
b) The design features include avoiding bedrock milling features and cupule rocks, and leaving large areas of the archaeological site in undeveloped open space. c) The project design includes as-needed over-excavation to ensure that all gravesites in the cemetery will have engineered fill or backfill extending to a minimum depth of five (5) feet below finished grade. The planned graves will be dug five (5) feet deep for the burial, per the established Muslim burial customs. Therefore, by having a minimum of five (5) feet of engineered fill, all earthwork during burials will remain within the engineered fill zone, and no natural ground will be disturbed.	
60-Planning-CUL. 5 Pre-grade Surface Collection. Prior to the start of any ground-disturbing activity in any phase of the project, the Native American Monitor shall conduct a surface collection of artifacts within that phase that would be subject to impacts from ground disturbance. The artifacts/cultural material will be kept in a secure location on site or temporarily kept by the Monitoring Tribe until such time as they are reburied in a location agreed upon by the Consulting Tribes and the project applicant/developer.	
60-Planning-CUL. 6. Project Archaeologist Archaeological Monitor. Prior to issuance of grading permits, the developer/permit applicant shall provide evidence to the County of Riverside Planning Department that a County-certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program for Phases 1, 2, and 3 of project development. The Project Archaeologist, in consultation with the Consulting Tribe(s) shall develop a Cultural Resources Management Plan (CRMP) that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant, as well as address potential impacts to undiscovered buried archaeological resources associated with this	

Mitigation Measure	Monitoring Method
project. The CRMP shall include a Controlled Grading Plan that will identify specific areas of the project site requiring controlled grading and detail the methods for such grading. Controlled grading entails small lifts of soil (3-5 inches), allowing the Native American Monitor and Archaeological Monitor adequate opportunity to examine the ground surface in a more controlled manner than general mass grading. This allows for recording cultural features and artifacts that may be destroyed or overlooked in standard mass grading. Controlled grading will be utilized for soil removals within and adjacent to the mapped boundaries of P-33-000710, in the areas of the historic archaeological sites, and at other areas identified by the Project Archaeologist or the Consulting Tribe(s) as requiring controlled grading. A fully executed copy of the contract and a wet-signed copy of the CRMP shall be provided to the County Archaeologist to ensure compliance with this condition of approval. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth-moving activities for project development are observed and shall be on-site during all ground-disturbing activities for the project in areas with the potential to yield archaeological resources (not in formational material), including clearing, grubbing, tree removals, grading and trenching, removal of existing structural remains and infrastructure, and over-excavation for Phases 1, 2, and 3 of project development. In conjunction with the Native American Monitor, the Archaeological Monitor shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.	
60-Planning -CUL-7 Temporary Construction Fencing. Prior to the start of any ground-disturbing activity, the applicant/developer shall ensure that temporary construction fencing is placed at the edges of the extent of grading and around bedrock milling features and cupule rocks within the development footprint to prevent inadvertent movement of personnel and	

Mitigation Measure	Monitoring Method
equipment into the areas of P-33-000710 that will remain in undeveloped open space and to ensure that no removals of bedrock milling features, cupule rocks, and cultural soils or cultural material occur in these areas. A Native American Monitor and an Archaeological Monitor shall observe the placement of fencing, which will be based on a fencing plan to be approved by the County Archaeologist and the Consulting Tribes. No staging of material or equipment shall occur within the fenced areas.	
70-Planning-CUL. 1. Artifact Disposition: Prehistoric Resources. Prior to Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery. Prehistoric Resources- The following treatment shall be applied. *Reburial of the resources on the Project property*. The measures for reburial shall include, at least, the following: Measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloguing, analysis, and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.	
70-Planning-CUL. 3. Phase IV Monitoring Report. Prior to Grading Permit Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground-disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations	

Mitigation Measure	Monitoring Method
Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required, as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have been treated in accordance with procedures stipulated in the Cultural Resources Management Plan.	
TCR - 1 The Pechanga Band requests avoidance to the greatest extent possible, of the most significant places within the TCR, namely CA-RIV-710 as they are elements of the larger TCRs identified by the tribes during consultation. The currently designed project avoids all known significant areas; however, additional areas of interest may be exposed during the grading operations of each phase of the project. Therefore, if significant archaeological sites, geologic features, or water resource features are identified during grading operations, these shall be avoided to the extent feasible through re-design in consultation with the Pechanga Band of Indians.	
TCR-2 Preparation of a Tribal Cultural Resource Management Plan (TCRMP). The TCRMP shall be prepared by the developer in close consultation with the Pechanga Band, to manage the impacts to the tangible cultural and natural resources identified in the project area and will outline in detail how the Tribal mitigation shall be implemented in a manner that respects Tribal cultural values. The TCRMP will be developed prior to grading permit issuance and approved by the County of Riverside after the Pechanga Band of Indians have fully reviewed and provided all edits. The TCRMP will function like a cultural resources management plan (CRMP), but will consider the TCRs as defined by California Public Resources Code Section 21074(a) and will be used as a	

Mitigation Measure	Monitoring Method
guide to identify, protect, and manage the tangible and intangible TCRs already present on site and those inadvertently identified within the project area, and ensure that impacts to these resources are minimized or avoided during project implementation. The TCRMP will include protection protocols to safeguard the known TCRs during construction and throughout the life of the project. This will include but is not limited to: • Incorporating an exhibit that details and identifies the tangible components of the TCR that encompasses the project area (i.e., features, natural resources, sites, preservation areas). • The development of buffer zones and exclusion areas around sensitive sites, as determined in consultation with the Pechanga Band, to ensure that the avoided resources are not disturbed by construction activities. The proposed development plan incorporates buffer zones around known significant areas, developed in consultation with the Pechanga Band over a period of several years. Buffer zones for newly identified resources may be mutually addressed based on inadvertent discoveries. (TCR-1, TCR-6, TCR-8) • Temporary protection measures during construction for Tribal Ceremonial Areas, such as restricted access to areas of spiritual or ceremonial importance by equipment and personnel and respecting seasonal and cultural significance of the land use. The areas of temporary protections may change depending on weather conditions and the areas of work. (TCR-4, TCR-6)	

Mitigation Measure	Monitoring Method
In addition, the TCRMP will specify the process for the following: • Preconstruction meeting requirements and monthly check in meetings • Cultural resources monitoring during construction and other ground-disturbing activities. • Phasing Plan and Map • Grading Schedule and Timeline based on Phasing Map • Avoidance Plan • Relocation Plan • Fencing Plan • Control Grading Plan • Inadvertent Finds • Inadvertent Findings of Human Remains • Photo Recordation of Inadvertent Features • Final Disposition of Inadvertently found Tribal Resources • The development process of a long-term management plan to ensure the protection of TCRs beyond the ground disturbing and construction phase of the project • Roles and Responsibilities and contact information for all parties • Mitigation Measures for Tribal Cultural Resources will be listed within the TCRMP for reference The Pechanga Band will co-manage the TCRMP with the landowner, Management Company , environmental agency such as RCA or other Conservation Easement Holder or Grantee.. CRMPs traditionally only address tangible archaeological and historical resources that are eligible for listing in the CRHR. A TCRMP is required for this Project because the identified TCR can only be defined by the Pechanga Band, which includes	

Mitigation Measure	Monitoring Method
places, sites, features, sacred places, and objects that have cultural significance, as well as archaeological resources.	
TCR – 3 Tribal Monitoring Agreements. The developer/Land Owner is required to enter into Agreements with the Pechanga Band of Indians for Tribal monitoring of the project. The agreements shall be in place prior to issuance of a grading permit. To accomplish this, the applicant should contact the Tribes no less than 30 days and no more than 60 days prior to issuance of a grading permit. This Agreement will address the treatment and disposition of Tribal cultural resources, the designation, responsibilities, and participation of Tribal monitors during grading, excavation and ground disturbing activities; project grading and development scheduling; terms of compensation for the monitors; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered onsite. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist. Tribal Monitors shall be allowed to monitor all grading, excavation, and groundbreaking activities associated with the project development and shall not monitor the excavation of individual graves in engineered fill soils associated with cemetery operations.	
TCR – 4 Environmentally Sensitive Areas (ESA). Prior to the start of ground-disturbing activities, all Tribal features shall be fenced off with construction fencing and identified as ESAs to ensure Project personnel do not disturb the features. The installation of the ESA fencing shall be monitored by the project archeologist and Tribal Monitors. Specific requirements pertaining to the avoidance	

Mitigation Measure	Monitoring Method
buffer, style, materials, access, maintenance, and other requirements shall be provided within the TCRMP.	
TCR – 5 Pre-grade Surface Collection. Prior to the start of any ground-disturbing activity in any phase of the project, the Native American and archaeological Monitors shall conduct a surface collection of artifacts within that phase that would be subject to impacts from ground disturbance. The archaeological monitor will record all surface collected resources using GPS to record resource location and all relevant documentation for DPR site record updates. The artifacts/cultural material will be temporarily kept on site in a secure location until such time as they are reburied in a location agreed upon by the Pechanga Band of Indians, and the project applicant/developer.	
TCR – 6 Avoidance Plan. Prior to issuance of a grading permit, an avoidance plan shall be prepared by the developer in consultation with the Pechanga Band of Indians. The avoidance plan is to formalize the avoidance areas with their buffer zones and how work shall proceed around them, inspections of protective fencing, protection measures should individual features need them, and how temporary avoidance area protocols shall be carried out. This plan shall indicate the areas/locations of the features that will be avoided by this project and the protection measures to be implemented during construction. In addition, the locations will be designated, in consultation with the Pechanga Band of Indians, on a confidential map. The developer/applicant shall provide evidence to the Riverside County Planning Department that the map has been included in the Grading Plans, and shall indicate the presence of environmentally constrained area(s) and	

Mitigation Measure	Monitoring Method
the requirements for avoidance of portions of CA-RIV-710.	
TCR – 7 Relocation of Cultural Features. Prior to the start of ground-disturbing activities, all impacted features recommended for relocation shall be temporarily fenced off with construction fencing and identified as ESAs to ensure project personnel does not disturb the features. The installation of the ESA fencing shall be monitored by the project archaeologist and Tribal monitors. Once the final location of the features has been determined and the area prepped, the features are to be moved to their final resting location. The features are only to be moved once. If the feature(s) do not survive the relocation efforts in one piece, all feasible fragments will be relocated to the final location. The relocation area shall be preserved in perpetuity and protected from all future ground-disturbing activity via an enforceable legal instrument such as a conservation easement or other restrictive binding upon successive owners of the relocation area.	
TCR – 8 Environmentally Sensitive Open Space Areas- Avoidance Mitigation for CA-RIV-710. Portions of site CA-RIV-710 will be avoided by the Project design. For purposes of preserving this site in perpetuity, the Project Applicant will record a restrictive covenant, or similar legal restriction, over the preservation portion of site CA-RIV-710 prior to the issuance of any grading permits for the Project. The Project Applicant, in consultation with the Project Archaeologist, County of Riverside, grading contractor, and the Pechanga Band of Indians, will create an exhibit for the placement of a temporary construction fence, around the preservation portion of site CA-RIV-710.	

Mitigation Measure	Monitoring Method
Permanent fencing around the preservation portion of site CA-RIV-710 will be installed in accordance with and in conformance to the Project's fencing plan. Future maintenance and upkeep of the fencing will be the responsibility of the Crescent Gardens Mortuary.	
TCR – 9 Controlled Grading and Grubbing. All grading shall be controlled in areas around identified Tribal Cultural Resources, such as cultural features or cultural areas of concern, including but not limited to all impacted areas within CA-RIV- 710 and as determined by the Pechanga Band of Indians. The identified areas shall be inspected by the Principal Investigator/Archaeologist and Pechanga Tribal monitor(s) prior to initiating grading for each area. Grading shall be controlled within the Environmentally Sensitive Buffer Area using a slope board or similar equipment to allow soil to be removed in increments of only a few inches at a time. Other areas that may require controlled grading shall be determined by the Principal Investigator/Archaeologist and the Pechanga Tribal monitor(s) based on the results and soil types identified during grading. Should any changes be needed, an updated exhibit will be produced and approved by all parties prior to any ground disturbance in the newly identified area.	
TCR-10 Inadvertent Finds. Avoidance and preservation in place is the preferred method for all Tribal Cultural Resources inadvertently discovered during the course of ground disturbing activities. If avoidance and preservation is not feasible, a feasibility study shall be required for final determination regarding the need for avoidance. If the County determines that the study has adequately demonstrated that preservation is not feasible, a Data Recovery/Treatment Plan for the	

Mitigation Measure	Monitoring Method
resource shall be drafted in consultation with the Pechanga Band, and subject to review and approval by the County of Riverside prior to implementation and recommencement of ground disturbing activities. If Tribal cultural resources are discovered during ground disturbance activities that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, the following procedures shall be followed. Treatment of tribal cultural resources inadvertently discovered during the project's ground-disturbing activities shall be subject to the consultation process required by state law and AB 52. i. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the Project Applicant, the Project Archaeologist, the Tribal Representative(s), and the County to discuss the significance of the find. ii. At the meeting, the significance of the discoveries shall be discussed and after consultation with the Tribal Representative(s) and the Project Archaeologist, a decision shall be made, with the concurrence of the County, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources. iii. Further ground disturbance, including but not limited to grading, trenching etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to	

Mitigation Measure	Monitoring Method
continue outside of the buffer area and will be monitored by additional Tribal Monitors if needed. iv. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design to the extent feasible, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/Mitigation Measures. v. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the County for their review and approval prior to implementation of the said plan. vi. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the Project Applicant and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the County of Riverside for decision. The County shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist, and shall consider the cultural and religious	

Mitigation Measure	Monitoring Method
principles and practices of the Tribe. Notwithstanding any other rights available under the law, the decision of the County shall be appealable to the County Planning Commission and Historical Commission. vii. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment finding.	
TCR – 11 **Human Remains.** If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the "most likely descendant". The "most likely descendant" shall then make recommendations, and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). (GP Objective 23.3, CEQA).	
TCR - 12 **Final Disposition.** Tangible cultural resources within the TCR inadvertently discovered during ground disturbing activities, as well as previously identified features that are not of ceremonial nature, which cannot remain in their existing location, shall be relocated to multiple mutually agreed upon areas within the 84.99-acre Project Area. These areas will be identified and described within the TCRMP and the CRMP as open space preservation areas, that will be	

Mitigation Measure	Monitoring Method
preserved in perpetuity so that no future disturbances will occur. In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries: a) One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the County of Riverside: i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources. ii. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods, and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to Public Records Request.	
TCR–13 Preservation and Maintenance Plan. Prior to Occupancy Permit Issuance, the landowner and the Pechanga Tribe shall develop a Preservation and Maintenance Plan for the long-term care and management of CA-RIV- 710	

Mitigation Measure		Monitoring Method
	and any additional areas that may be included as mitigation for inadvertently found cultural sites. The plan shall indicate at a minimum, the specific areas to be included in and excluded for long-term maintenance, prohibited activities, methods of preservation to be employed, measures for stabilization of the relocated resources, security and long-term preservation, the party responsible for the long-term maintenance, appropriate protocols and necessary emergency protocols. The plan shall also identify areas of Tribal access for Cultural and educational purposes. The plan shall be developed in consultation with the Pechanga Band, and subject to review and approval by the County of Riverside. The project applicant/landowner shall submit a fully executed copy of the preservation and maintenance plan to the County of Riverside and the Pechanga Band of Indians.	
TCR – 14	**Reburial area.** Prior to issuance of grading permits: the developer/ applicant, in consultation with the Pechanga Band of Indians, shall provide evidence to the Riverside County Planning Department that a Reburial Area(s) have been identified and an Environmental Constraints Sheet has been included in the Grading Plans. This sheet shall indicate an area that will be used for reburial of any artifacts that have been identified during grading and cannot be avoided. This area will be protected and not disturbed in the future. This is confidential information, and the exact nature of this area will not be called out on the grading plans.	
TCR-15	**Non-Disclosure.** It is understood by all parties that unless otherwise required by law, the site of any reburial of Native	

Mitigation Measure		Monitoring Method
	American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 7927.000, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 7927.000.	
TCR- 16	**Tribal Notification for Annual Fuel Modification Maintenance.** The Pechanga Band of Indians understands that the Project will be required to have fuel modification maintenance on an annual or biannual basis by the County of Riverside Fire Marshall. The Project applicant shall notify the Pechanga Band of Indians for all such required work by the County Fire Marshall in all open space areas within the Project.	
TCR-17	**Phase IV Report.** Prior to final inspection, the Project Archaeologist is to submit two (2) copies of the Phase IV Monitoring Report that addresses Cultural and Tribal Cultural Resources and complies with the Planning Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Planning Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Planning Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the South Coastal Information Center (SCIC) at San	

Mitigation Measure	Monitoring Method
Diego State University (SDSU) and one (1) copy shall be submitted to the Pechanga Cultural Resources Department.	