

COUNTY OF RIVERSIDE

ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Environmental Assessment (CEQ / EA) Number: N/A

Project Case Type (s) and Number(s): GPA250002, CZ2500002, AGD250001, TTM39011,

Lead Agency Name: County of Riverside Planning Department

Address: 4080 Lemon Street 12th Floor, Riverside, CA 92501

Contact Person: Jose Merlan

Telephone Number: 951-955-3025

Applicant's Name: Adkan Engineers

Applicant's Address: 6879 Airport Drive, Riverside, CA 92504

Final Hearing Body (DH/PC/BOS):

Final (Date Adopted by Hearing Body):

I. PROJECT INFORMATION

A. Project Description:

Regional Setting

The 36.55-acre Project site is located within the western portion of unincorporated Riverside County, California. Figure 1-1, as shown below, depicts the Project site's location within the regional vicinity. As shown, Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximate 28,000 square-mile region comprising western San Bernardino County, western Riverside County, and the eastern reaches of Los Angeles County.

Project Location and Setting

As depicted on Figure 1-2, shown below, the Project site is located within the Victoria Grove community of the Lake Mathews/Woodcrest Area Plan (LMWAP) of unincorporated Riverside County. More specifically, the 36.55-acre Project site as depicted on Figure 1-3, shown below, is located north of El Sobrante Road, east of McAllister Street, and west/southwest of Travertine Drive. Under existing conditions, the Project site is vacant and undeveloped. Under existing conditions, the Project site generally is surrounded by vacant land, agricultural uses, residential uses, and commercial uses.

Proposed Project

The Project as evaluated herein consists of applications for a General Plan Amendment (GPA 250002), Change of Zone (CZ250002), Agricultural Preserve Diminishment (AGD 250001), and Tentative Tract Map (TTM 39011) for a 36.55-acre property located east of McAllister Street and north of El Sobrante Road in the Victoria Grove community of the Lake Mathews/Woodcrest Area Plan (LMWAP) portion of unincorporated Riverside County. Collectively, approval of these discretionary actions would allow for the development of the Project site with 73 single-family detached residential units on minimum 10,000 square-foot (s.f.) lots on approximately 21.00 acres; one detention/water quality basins on approximately 1.87 acres; slopes and open space on approximately 7.06 acres; and private internal roadways on approximately 5.90 acres, and a proposed recreational facility on 0.73 acres containing trails and park amenities. Access to the Project site would be accommodated via proposed off-site roadways currently under construction as part of Tract Map No. 38605. The primary access for the project would enter the site from the westerly boundary. The primary access extends westerly through Tract Map No. 38605 utilizing a connection into Dry Creek Lane until the intersection of Tempranillo Avenue, then southerly until the intersection of El Sobrante Road. The secondary access would enter the project site from the northwest boundary. The secondary access extends northerly

utilizing a connection to Harvest Ridge Road, then northwesterly to the intersection of Saint Helena Lane, then southwesterly to the intersection of Waddel Road, then northerly to an access paved road, restricted to emergency access vehicles only, to Travertine Drive. Travertine Drive being part of Tract Map 36475, in a community known as Tramonte lying north of Tract Map No. 38605 and further north of TTM 39011. The project is also proposing the upsizing of 9,600 linear feet of existing water line from 6" to 24" as shown on Western Municipal Water District's (WMWD) current adopted master plan. The existing offsite water line will be upsized from the easterly boundary and extend easterly along Blackburn Road, then southerly along Palm Road, then easterly along Darafeev Lane, connecting to the Lockwood tanks site. The Lockwood tank site will provide domestic water service for the proposed project. A depiction of the offsite waterline alignment is shown on Figure 1-5.

This Environmental Assessment analyzes the physical effects associated with all components of the proposed Project, including planning, construction, and ongoing operation. The governmental approvals requested from Riverside County to implement the Project consist of the following:

- Adoption by resolution of a General Plan Amendment (GPA250002)
- Adoption by ordinance of a Change of Zone (CZ2500002);
- Adoption by resolution of Tentative Tract Map No. 39011 (TTM 39011);
- Adoption by resolution of Agricultural Preserve Diminishment (AGD250001; El Sobrante 1);
- and Certification of this Environmental Assessment.

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

General Plan Amendment No. 250002 The general plan proposed by the Project would amend the land use designation of parcel 270-160-008 from being split among a portion of Rural Community – Low Density Residential (RC-LDR) and a portion of Rural Community – Very Low Density Residential (RC-VLDR) to being entirely Rural Community - Low Density Residential (RC-LDR). The purpose of the General Plan Amendment is to correct the currently land use designation as shown by the Riverside County General plan being inconsistent with the configuration of the project parcels and property boundary.

Change of Zone No. 2500002 The zone change proposed by the Project would amend the zoning classification of parcels 270-160-006 and 270-160-008 (36.55 acres total) from A-1-10 (Light Agriculture) to R-1-10000 (One-family dwellings, 10,000SF minimum).

Tentative Tract Map No. 39011 proposes to subdivide approximately 36.55 acres (gross) of the Project site to allow for the development of a residential community with open space land uses. The TTM would establish a subdivision of 73 residential lots (totaling 26.88 acres of residential uses) while the remaining 9.67 acres are proposed for open space and water quality retention basins. A depiction of Tentative Tract Map No. 39011 is shown on Figure 1-4, below.

Agricultural Preserve Diminishment

Proposed Agricultural Preserve Diminishment No. 250001 (AGD250001) would remove a 36.55-acre portion of the Project site from the El Sobrante No. 1 Agricultural Preserve. AGD250001 would not diminish the entire El Sobrante No. 1 Agricultural Preserve, as other properties would remain in the El Sobrante No. 1 Agricultural Preserve.

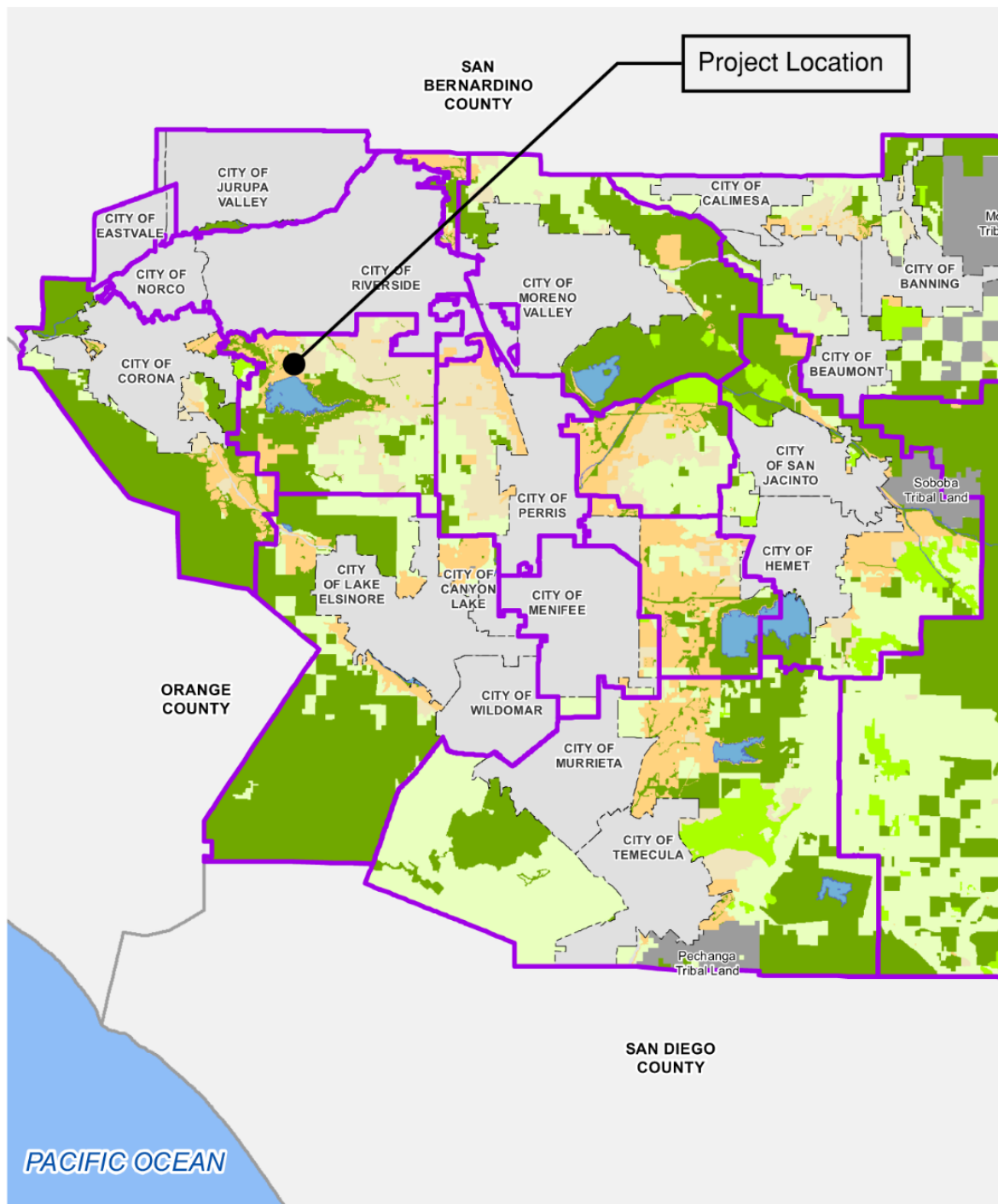


Figure 1.1 - Project Regional Location

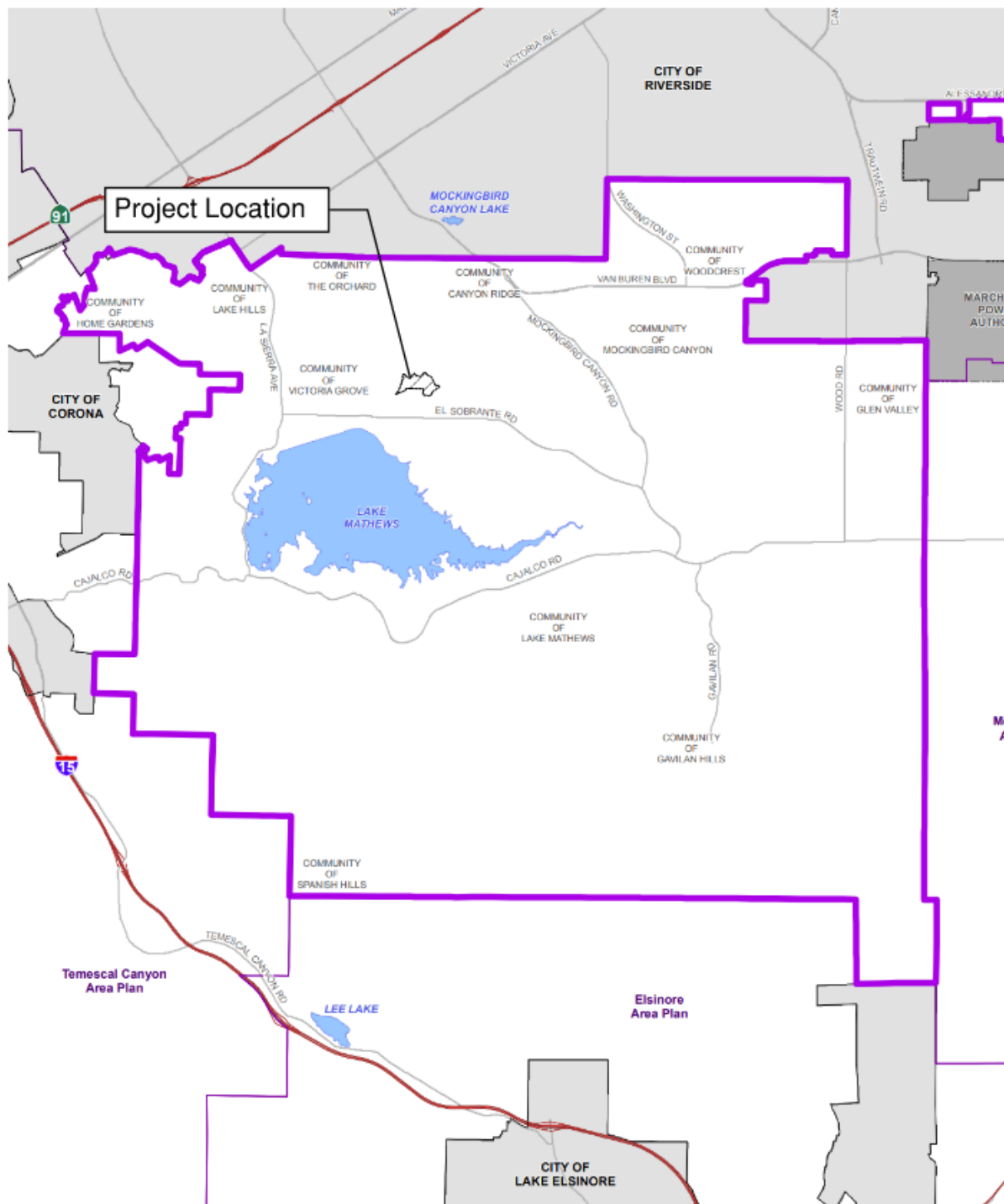
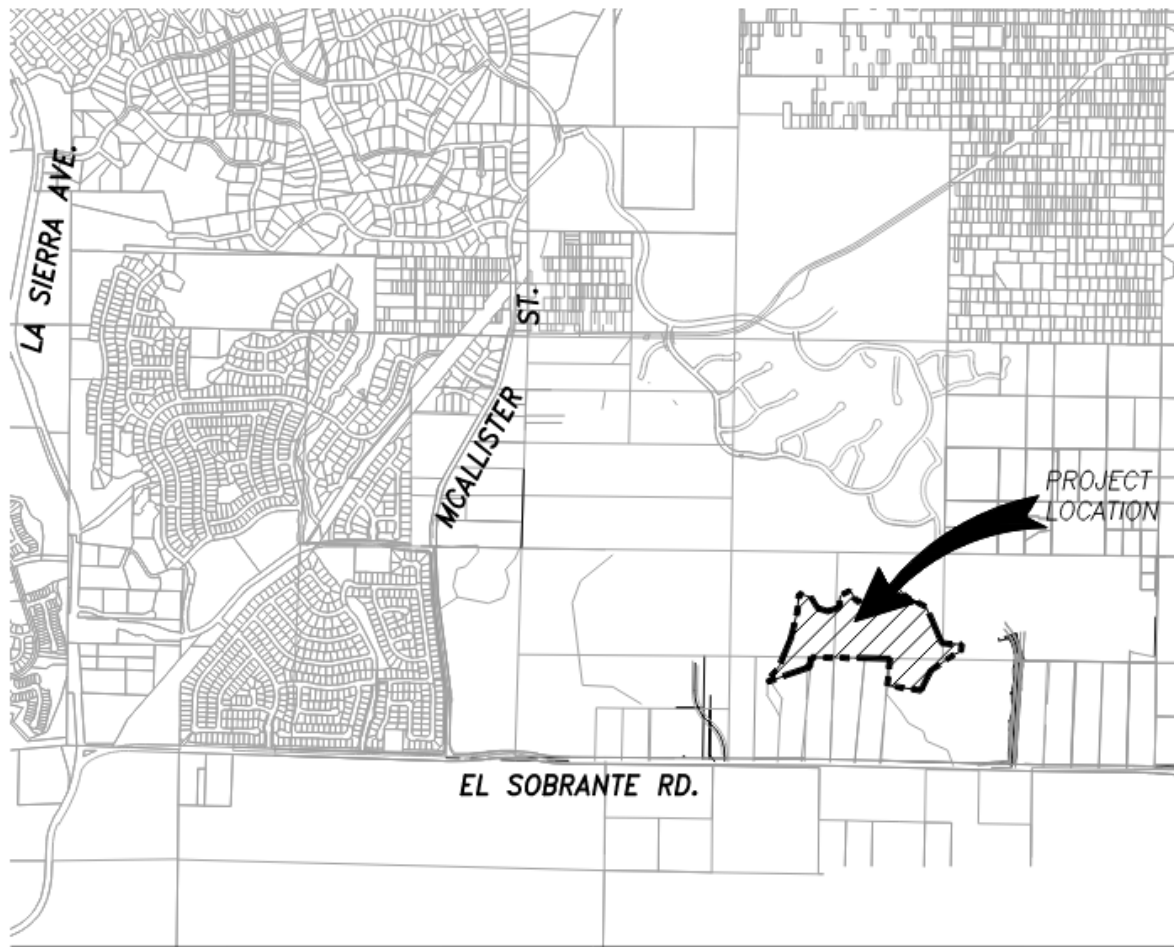
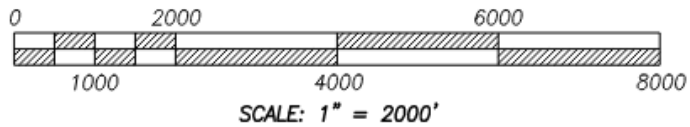


Figure 1.2 - Project Location (Lake Matthews Area Plan)



LAKE MATHEWS



PREPARATION DATE: NOV 2024

Figure 1.3 - Project Specific Location

Figure 1.4 Tentative Tract Map No. 39011

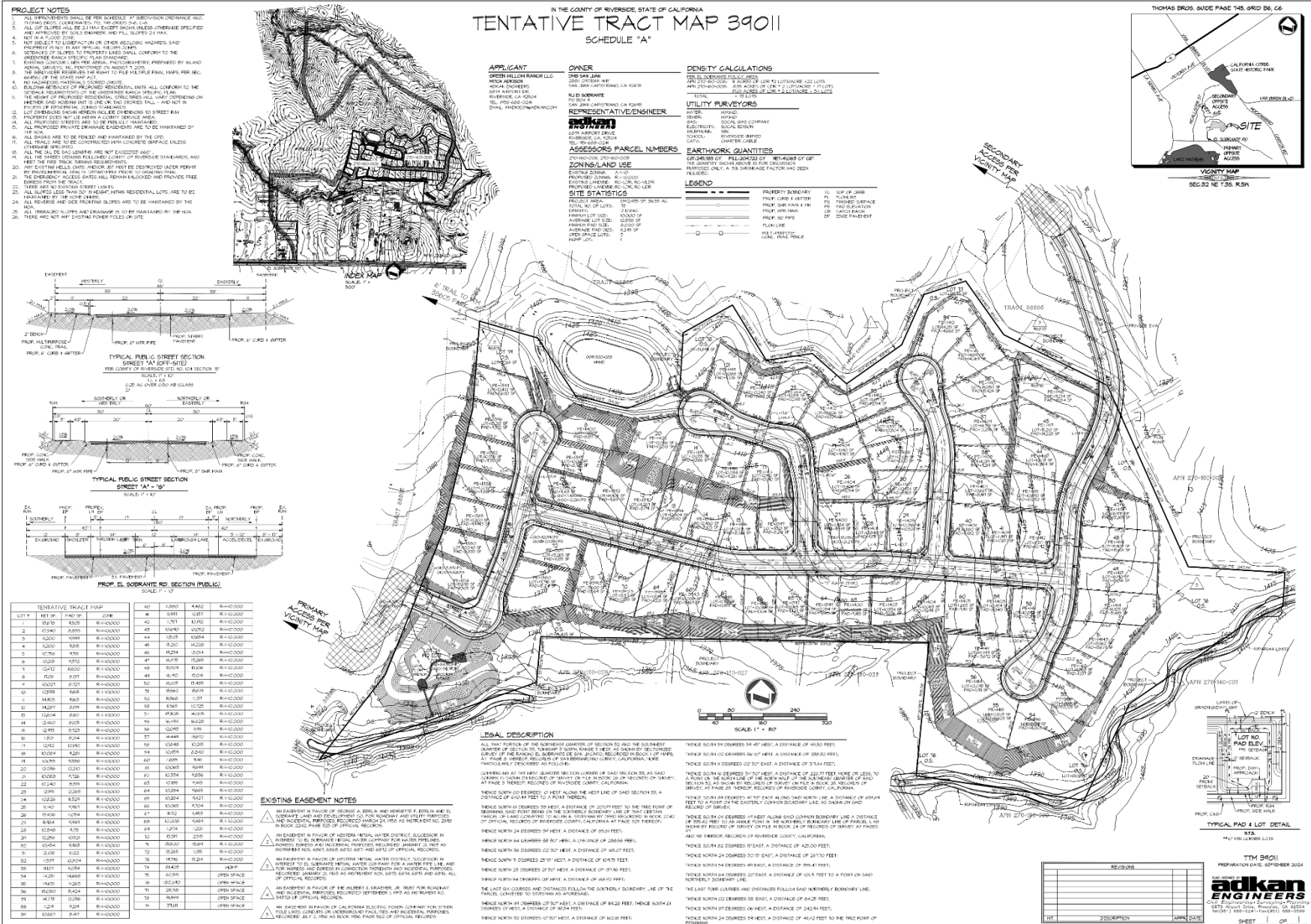
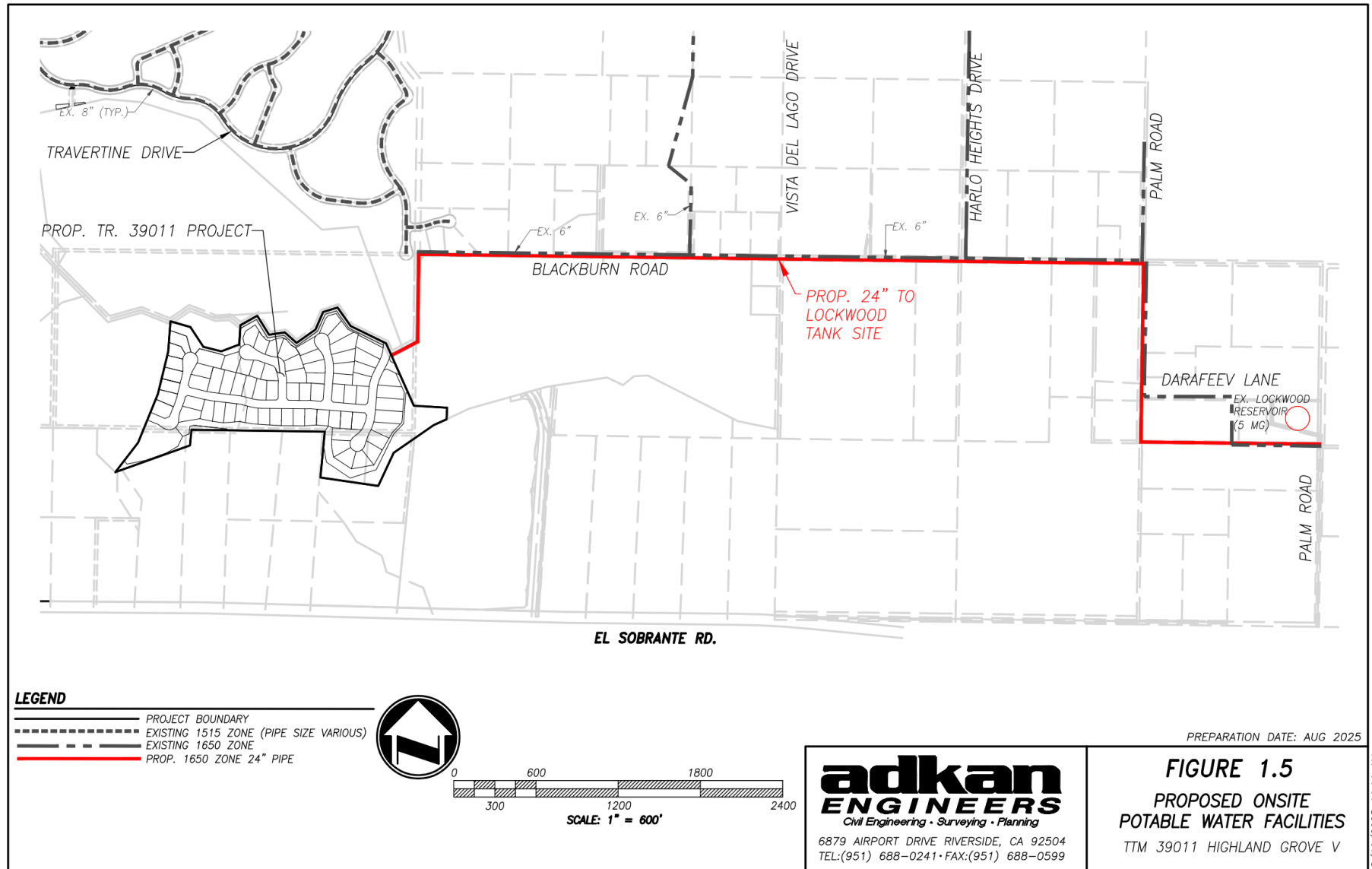


Figure 1.5 – Offsite Water Line Alignment



U:\Projects\FOREMOST COMMUNITIES\8794\Waddell\10615 - HG5\EXHIBITS\FIGURE 1.5 PROP. ONSITE POTABLE WATER FACILITIES.dwg

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

C. Total Project Area:

Residential Acres: 36.55	Lots: 73	Units: 73	Projected No. of Residents: 244
Commercial Acres: 0	Lots: 0	Sq. Ft. of Bldg. Area: 0	Est. No. of Employees: 0
Industrial Acres: 0	Lots: 0	Sq. Ft. of Bldg. Area: 0	Est. No. of Employees: 0
Other:			

D. Assessor's Parcel No(s): 270-160-006, 270-160-008

E. Street References: North of El Sobrante Road, South of Travertine Drive, east of McAllister Street, and west of Vista Del Lago Drive.

F. Section, Township & Range Description or reference/attach a Legal Description: Section 32 Township 3 South, Range 5 West.

G. Brief description of the existing environmental setting of the project site and its surroundings:

The Project site consists of vacant with native vegetation and undeveloped land that is routinely disturbed by weed abatement activities (i.e., disking). Unpaved and unplanned trails and roadways are located throughout the entire Project site. Along the southern perimeter in the eastern and western portions of the Project site are existing natural drainage channels; this drainage channel flows westerly, then northerly, to a point where the drainage converges with another drainage course to the northwest. The Project site is characterized by gently sloping hills with areas containing more level ground. Project site elevations range from approximately 1,374 feet above mean sea level (AMSL) along the southerly boundary in the western portion of the Project site (near the creek) to approximately 1,419 AMSL at the northern boundary of the Project site (Google Earth, 2023).

The Project site is located in a portion of Riverside County that is transitioning from agricultural land uses to medium and low-density suburban developments. Under existing conditions, the Project site is surrounded to the south and east by a mixture of agricultural facilities, and to the west and north by housing developments undergoing active construction. The majority of the land surrounding of the Project site are designated by the Riverside County General Plan for "Very Low Density," "Low Density," or "Medium Density" Residential development. Land uses surrounding the Project site include the following:

North: The Project site is bordered to the North by a future development of 163 single-family homes as part of approved Tract Map No. 38605, currently under construction. Further north is a residential development of 167 single-family homes as part of approved Tract Map No. 36475 (Tramonte).

South: The Project site's southern boundary is adjacent to agricultural fields and groves, undeveloped/vacant land (containing sparse amounts of natural vegetation due to on-going weed-abatement activities), and accessory structures and residences that support agricultural activity. Along a portion of the southern boundary and to the southwest are additional agricultural groves and vacant land. Further south of the Project site is El Sobrante Road beyond which is undeveloped land, agricultural uses, and Lake Mathews.

East: Immediately east of the project is vacant land containing the remnants of an existing orange grove, now mostly consisting of natural vegetation and on-going weed abatement activities. Further to the

east of the Project site is Vista Del Lago Drive, beyond which are a deteriorating agricultural groves, rural residential uses, and undeveloped land that has been subject to weed abatement.

West: The Project site's western boundary is adjacent to agricultural fields and groves, currently being developed by Tentative Tract Map No. 38927 proposing a community of 206 residential lots. Further west is an approved development under construction with up to 285 single-family homes as part of approved Tract Map No. 36730 (Highland Grove I). Beyond is McAllister Street and a medium-density residential community with lot sizes as small as 7,200 square feet.

H. Other Public Agency Involvement and Required Permits:

The Project will be reviewed by Western Municipal Water District (WMWD) for feasibility of providing capacity for water and sewer facilities.

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

- 1. Land Use:** The Project site is located within the Lake Mathews/Woodcrest Area Plan (LMWAP). The Riverside County General Plan land use designations that currently apply to the Project site include a split between "Rural Community – Low Density Residential (RC-LDR)" for a majority of the project site and "Rural Community – Very Low Density Residential (RC-VLDR)" for the remaining smaller portion of the project site. The land use designation is proposed to be amended to being entirely "Rural Community – Low Density Residential (RC-LDR)" to correct the current land use designation as shown by the Riverside County General plan being inconsistent with the configuration of the project parcels and property boundary.
- 2. Circulation:** The Riverside County Transportation Department will review the Project for conformance with County Ordinance No. 461 (Road Improvement Standards and Specifications). Adequate circulation facilities exist or are planned to serve the proposed development. The proposed Project adheres to all applicable circulation policies of the Riverside County General Plan. A Project-specific traffic study has been prepared that will identify any project specific improvements to confirm consistency with the General Plan Circulation Element.
- 3. Multipurpose Open Space:** The Project site is not identified for conservation by the Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Although habitat conservation is not required on the Project site pursuant to the MSHCP, all projects must demonstrate compliance with applicable MSHCP requirements in accordance with the following sections of the MSHCP: Section 6.1.2, "Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools;" Section 6.1.3, "Protection of Narrow Endemic Plant Species;" Section 6.1.4, "Guidelines Pertaining to the Urban/Wildland Interface;" and Section 6.3.2, "Additional Survey Needs and Procedures." A discussion of the Project's consistency with these sections of the MSHCP is provided in the project specific biological and MSHCP consistency analysis, along with an analysis of consistency with the General Plan goals and policies related to multipurpose open space.
- 4. Safety:** The Project site is located entirely in a Moderate Fire Hazard Severity Zone. The Project site is not identified as being located in an area that is susceptible to liquefaction or subsidence hazards. No faults or fault zones occur on-site. The future workers or residents at the Project site would not be subjected to any emergency response deficiencies due to Project design and the Project Applicant

would be required to pay all applicable development impact fees that are used to fund emergency services, as required by the County.

5. **Noise:** Although the Project site is not located in area known to be subject to high levels of noise, an acoustical analysis was performed to confirm Project consistency the related General Plan goals and policies that address environmental noise.
6. **Housing:** The Riverside County General Plan Housing Element does not contain any policies applicable to the proposed Project, but rather identifies programs and actions to achieve the County's goals with respect to housing. The proposed Project does, however, relate to the County General Plan Housing Element through the Project's proposed land uses on the subject property. Specifically, the provision of up to 73 residential dwelling units on-site would accommodate a portion of the County's long-term housing demand and would expand the range of housing opportunities available in the Project area. The 73 proposed dwelling units are consistent with densities allowed for the site under proposed General Plan land use designations. The land uses proposed by the Project on the site property would not adversely impact the implementation of the County General Plan Housing Element's goals or policies.
7. **Air Quality:** The proposed Project would be required to control fugitive dust emissions during grading and construction activities and to reduce air pollutant emissions to the greatest feasible extent in accordance with South Coast Air Quality Management District (SCAQMD) requirements. Long-term operation of the Project has the potential to violate SCAQMD thresholds of significance for daily air pollutant emissions. A Project-specific air quality impact analysis was prepared, the results show the projects consistency related to all applicable Riverside County General Plan Air Quality Element policies.
8. **Healthy Communities:** The proposed Project would be required to expand the current bike path and trail system. The proposed project would align with implementation of the Riverside County General Plan Healthy Communities goals and policies.
9. **Environmental Justice Summary:** This project is not located within an Environmental Justice Community.

B. General Plan Area Plan(s): Lake Mathews/Woodcrest Area Plan

C. Foundation Component(s): Rural Community (RC)

D. Land Use Designation(s): The following provides a summary of the site's existing and proposed land use designations.

1. Existing: The existing land use of the project is currently split between a larger portion of "Rural Community – Low Density Residential (RC-LDR)" and the remaining smaller portion of "Rural Community – Very Low Density Residential (RC-VLDR)."
2. Proposed: The proposed land use designation is to be amended to being entirely "Rural Community – Low Density Residential (RC-LDR)" to correct the current land use designation as shown by the Riverside County General plan being inconsistent with the configuration of the project parcels and property boundary.

E. Overlay(s), if any: None

F. Policy Area(s), if any: El Sobrante Policy Area

G. Adjacent and Surrounding:

1. **General Plan Area Plan(s):** Temescal Canyon Area Plan to the west, Mead Valley Area Plan to the east, and Elsinore Area Plan to the south
2. **Foundation Component(s):** "Rural" to the east and west; "Rural Community" to the north and south.
3. **Land Use Designation(s):** North of the Project site is "Rural Community – Very Low Density Residential," and "Rural Community – Low Density Residential," south of the Project site is "Rural Community – Very Low Density Residential," and "Rural Community – Low Density Residential," east of the Project site is "Rural Community – Very Low Density Residential," and "Rural Community – Low Density Residential;" and west of the Project site is "Rural Community – Low Density Residential".
4. **Overlay(s), if any:** None
5. **Policy Area(s), if any:** El Sobrante Policy Area

H. Adopted Specific Plan Information

1. **Name and Number of Specific Plan, if any:** None
2. **Specific Plan Planning Area, and Policies, if any:** None

I. Existing Zoning: Light Agriculture-10 Acre Minimum (A-1-10)

J. Proposed Zoning, if any: One-Family Dwellings (R-1-10000)

K. Adjacent and Surrounding Zoning: Residential Agricultural (R-A-1), Specific Plan (S-P), Single-Family Residential (R-1) to the north; Light Agriculture (A-1-10) to the east; Light Agriculture (A-1-10) to the south; and Specific Plan (S-P), Light Agriculture- 5 Acre Minimum (A-1-5), and Single Family Residential (R-1) to the west.

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

IV. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED

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

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED

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

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



Signature

November 14, 2025

Date

Jose Merlan, Principal Planner

Printed Name

For: John Hildebrand
Planning Director

V. ACRONYMS AND ABBREVIATIONS

<u>Acronym</u>	<u>Definition</u>
§	Section
>	greater than
≥	greater than or equal to
A-1	Light Agriculture
A-1-5	Light Agriculture for 5-acre minimum lot size
A-1-10	Light Agriculture for 10-acre minimum lot size
A-2	Heavy Agriculture
A-D	Agriculture-Dairy
A-P	Alquist-Priolo
A-P	Light Agriculture with Poultry
a.m.	Ante Meridiem (between the hours of midnight and noon)
AM	Ante Meridiem (between the hours of midnight and noon)
AB	Assembly Bill
ac	Acres
ACM	Alternative Calculation Method
ACOE	Army Corps of Engineers
A.D.	Anno Domini
ADT	Average Daily Traffic
afu	Undocumented Artificial Fill
AFY	Acre Feet per Year
AG	Agricultural Preserve Diminishment
AGN	Agricultural Preserve Notice of Nonrenewal
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
amsl	Above Mean Sea Level
APE	Area of Potential Effect
APN	Assessor Parcel Number
AQIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plan
BAAQMD	Bay Area Air Quality Management District
B.C.	Before Christ
BFSa	Brian F. Smith and Associates (Project Technical Consultant)
BMPs	Best Management Practices
C&D	Construction & Demolition
C/V	Citrus/Vineyard
C2F6	Hexafluoroethane
C2H6	Ethane
CA	California
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAGN	Coast California Gnatcatcher CalEEMod™ California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code

CA MUTCD	California Manual on Uniform Traffic Control Devices
Cal Pub Res.	California Public Resources Code
Caltrans	California Department of Transportation
Calveno	California Vehicle Noise
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CAPSSA	Criteria Area Plant Species Survey Area
CARB	California Air Resources Board
CASSA	Criteria Area Species Survey Area
CAT	Climate Action Team
CBC	California Building Code
CBSC	California Building Standards Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDC	California Department of Conservation
CDF	California Department of Forestry
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEPA	California Environmental Protection Agency
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code
CFCs	Chlorofluorocarbons
C2F6	Hexafluoroethane
CF4	Tetrafluoromethane
CF3CH2F	HFC-134a
CFR	Code of Federal Regulations
cfs	Cubic Feet per Second
CGC	California Government Code
CGS	California Geologic Survey
C2H6	Ethane
CH4	Methane
CH3CHF2	HFC-152a
CHF3	HFC-23
CIPP	Cast-In-Place Pipe
CIWMB	California Integrated Waste Management Board
CIWMP	California Integrated Waste Management Plan
CLCA	California Land Conservation Act
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	Carbon Monoxide
COA	Condition of Approval
COG	Council of Governments
COHb	carboxyhemoglobin
CO2	Carbon Dioxide
CO2e	Carbon Dioxide Equivalent
COHb	carboxyhemoglobin

COP	Community Oriented Policing
COPPS	Community Oriented and Policing Problem Solving
CPUC	California Public Utilities Commission
CRDR	County Regulation and Design Requirement
CRMP	Cultural Resources Monitoring Program
CRRC	Cool Roof Rating Council
CSA	County Service Areas
CTC	California Transportation Commission
CTR	California Toxics Rule
Cu	Copper
CWA	Clean Water Act
CWC	California Water Code
c.y.	Cubic Yards
CZ	Change of Zone
dB	Decibel
dBA	A-weighted Decibels
dBA Leq	A-weighted Decibels equivalent sound level
DBESP	Determination of Biologically Equivalent or Superior Preservation
DEH	Department of Environmental Health
DEIR	Draft Environmental Impact Report
DIF	Development Impact Fee
DOSH	Division of Occupational Safety and Health
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substances Control
du	Dwelling Unit
du/ac	Dwelling units per acre
DWR	Department of Water Resources
E+P	Existing plus Project Conditions
E+P	Existing plus Project Conditions
EA	Existing plus Ambient
EAC	Existing plus Ambient plus Cumulative
EAP	Existing plus Ambient plus Project
EAPC	Existing plus Ambient plus Project plus Cumulative
EDR	Environmental Data Resources, Inc.
e.g.	exempli gratia, meaning "for example"
EIR	Environmental Impact Report
EIS	Eastern Information Center
EMFAC	Emission Factor Model
EO	Executive Order
EPA	Environmental Protection Agency
EPS	Emission Performance Standard
ESA	Endangered Species Act
et seq.	et sequentia, meaning "and the following"
F	Fahrenheit
FAA	Federal Aviation Administration
FBR	Fire Behavior Report
FEIR	Final Environmental Impact Report

FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FIRM	Flood Insurance Rate Map
FHA	Federal Housing Administration
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GBN	Ground-Based Noise
GBV	Ground-Based Vibration
GCC	Global Climate Change
Gg	Gigagrams
GHG	Greenhouse Gas
GIS	Geographic Information System
GMZ	Groundwater Management Zone
Gov. Code	Government Code
GPA	General Plan Amendment
GPCD	Gallons per capita per day
gpd	Gallons per Day
GPLUA	No Project/General Plan Land Use Alternative
GSA	Groundwater Sustainability Agencies
GSPs	Groundwater Sustainability Plans
GWP	Global Warming Potential
H2O	Water Vapor
HA	Hydrologic Area
HANS	Habitat Evaluation and Acquisition Negotiation Strategy
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HFCs	Hydrofluorocarbons
HERS	Home Energy Rating System
HET	High-Efficiency Toilet
HI	Hazard Index
HMTA	Hazardous Materials Transportation Act
HMTUSA	Hazardous Materials Transportation Uniform Safety Act
HOA	Homeowners' Association
hp-hr-gal	Horsepower hours per gallon
HSA	Hydrologic Subarea
HSWA	Hazardous and Solid Waste Amendments
HUD	United States Department of Urban Development
HWCL	Hazardous Waste Control Law
I	Interstate
i.e.	that is
IA	Implementing Agreement
IBC	International Building Code
ICAO	International Civil Aviation Organization
in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change

IS	Initial Study
ISEE	International Society of Explosives Engineers
ISTEA	Intermodal Surface Transportation Efficiency Act of 1991
ITE	Institute of Transportation Engineers
IWMA	Integrated Waste Management Act
IWMP	Integrated Waste Management Plan
Kcgb	Granodiorite and Gabbro
kWh	kilowatt-hour
lbs	pounds
LBV	Least Bell's Vireo
LCA	Life-cycle analysis
LCFS	low carbon fuel standard
LDR	Low Density Residential
LDN	Day-Night Average Noise Level
LEA	Lead Enforcement Agency
Leq	equivalent continuous sound level
LMWAP	Lake Mathews/Woodcrest Area Plan
LOS	Level of Service
LRA	Local Responsibility Area
LSA	Lake and Streambed Alteration Agreement
LSTs	Localized Significance Thresholds
LULUCF	Land-Use Change and Forestry
M-R	Modulus of Rupture
MBTA	Migratory Bird Treaty Act
MDR	Medium Density Residential
Mgd	million gallons per day
MICR	Maximum Individual Cancer Risk
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MMTs	million metric tons
MMTCO _{2e}	million metric tons of carbon dioxide equivalent
Mph	Miles per hour
MPG	Miles per gallon
MPO	Metropolitan Planning Organization
MRZ-3	Mineral Resource Zone 3
MSHCP	Multiple Species Habitat Conservation Plan
MTCO _{2e}	Metric Tons of Carbon Dioxide Equivalent
MVTS	Moreno Valley Transfer Station
MWD	Metropolitan Water District
N/A	Not Applicable
n.d.	no date
NAHB	National Association of Home Builders
NAHC	Native American Heritage Commission
NAAQS	National Ambient Air Quality Standards
NDA	No Project/No Development Alternative
NEPSSA	Narrow Endemic Plant Species Survey Area

NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NIOSH	National Institute for Occupational Safety and Health
NLR	Noise Level Reduction
No.	Number
NO	Nitric Oxide
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
N ₂	Nitrogen
N ₂ O	Nitrous Oxide
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NPS	Non-point source
NTR	National Toxics Rule
NVIA	Noise and Vibration Impact Assessment
O ₂	Oxygen
O ₃	Ozone
OPR	Office of Planning and Research
Ord.	Ordinance
OS-C	Open Space – Conservation
OSHA	Occupational Safety and Health Act
OSMRE	Office of Surface Mining Reclamation and Enforcement
Pb	Lead
PCBs	Polychlorinated biphenyls
PCC	Portland cement concrete
PEL	Permissible Exposure Limit
PeMS	Caltrans' Performance System Website
PFCs	Perfluorocarbons
PGAM	Peak Horizontal Ground Acceleration
PHF	peak hour factor
p.m.	Post Meridiem (between the hours of noon and midnight)
PM	Post Meridiem (between the hours of noon and midnight)
PM	Tentative Parcel Map
PM _{2.5}	Fine Particulate Matter (2.5 microns or smaller)
PM ₁₀	Fine Particulate Matter (10 microns or smaller)
ppb	parts per billion
ppm	parts per million
ppt	parts per trillion
PPV	Peak Particle Velocity
PRC	Public Resources Code
PRIMP	Paleontological Resource Impact Mitigation Program
PRPA	Paleontological Resources Preservation Act
PTS	Perris Transfer Station Pub. Res. Code Public Resources Code
Qal	Alluvium
Qcol	Colluvium
Qoa	Older Alluvium

Qvof	Very Old Alluvial Fan Deposits
R-A-1	Residential Agricultural with 1 acre minimum lot size
R-A-5	Residential Agricultural with 5 acre minimum lot size
R-1	One Family Dwellings
R-4	Planned Residential
RC-EDR	Rural Community – Estate Density Residential
RC-LDR	Rural Community – Low Density Residential
RC-VLDR	Rural Community – Very Low Density Residential
RCA	Regional Conservation Authority
RCDWR	Riverside County Department of Waste Resources
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCHCA	Riverside County Habitat Conservation Agency
RCPLS	Riverside County Public Library System
RCRA	Resource Conservation and Recovery Act
RCSD	Riverside County Sheriff's Department
RCTC	Riverside County Transportation Commission
REC	Recognized Environmental Concerns
RECLAIM	Regional Clean Air Incentives Market
REMEL	Reference Energy Mean Emission Level
RivTAM	Riverside County Transportation Analysis Model
RMS	Root Mean Square
ROGs	Reactive Organic Gasses
ROW	Right of Way
RR	Rural Residential
RPS	Renewable Portfolio Standards
RPU	Riverside Public Utilities Department
RPW	Relative Permanent Water
RTA	Riverside Transit Agency
RTP	Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RUSD	Riverside Unified School District
RUSFP	Riverside Unit Strategic Fire Plan
RV	Recreational Vehicle
RWQCB	Regional Water Quality Control Board
S-P	Specific Plan Zone
s.f.	square foot or square feet
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCH	California State Clearinghouse (Office of Planning and Research)
SCS	Sustainable Communities Strategy
SEMS	Standardized Emergency Management System
SF6	Sulfur Hexafluoride

SFL	Sacred Lands File
SFP	School Facilities Program
SGMA	Sustainable Groundwater Management Act
SHS	State Highway Facilities
SIP	State Implementation Plan
SKR	Stephens' Kangaroo Rat
SKR HCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SLF	Sacred Lands Files
SO2	Sulfur Dioxide
SO4	Sulfates
SOX	Sulfur Oxides
SOC	Statement of Overriding Considerations
SoCAB	South Coast Air Basin
SOI	Sphere of Influence
SP	Specific Plan
SR-91	State Route 91
SRA	State Responsibility Area
SRA	Source Receptor Area
SRRE	Source Reduction and Recycling Element
STC	Sound Transmission Class
SWFF	Southwestern willow flycatcher
SWFP	Solid Waste Facility Permit
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Regional Control Board
TAC	Toxic Air Contaminants
TCL	Traditional Cultural Landscape
TCR	Tribal Cultural Resources
TIA	Traffic Impact Analysis
TLMA	Riverside County Transportation and Land Management Agency
tpd	Tons per day
tpw	Tons per week
TR	Tentative Tract Map
TSS	Total Suspended Solids
TUMF	Transportation Uniform Mitigation Fee
UBC	Uniform Building Code
U.S.	United States
USC	United States Code
USEPA	United States Environmental Protection Agency
USDA	U.S. Department of Agriculture
USFWS	United States Fish and Wildlife Service
USHMA	Urban Seismic Hazards Mapping Act
UWMP	Urban Water Management Plan
Vdb	Vibration Decibel
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds

WDR	Waste Discharge Requirements
WIFL	Willow Flycatcher
WMI	Watershed Management Initiative
WMWD	Western Municipal Water District
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Association of Governments
WRCRWA	Western Riverside County Regional Wastewater Authority
WRCRWTP	Western Riverside County Regional Wastewater Treatment Plan
WRP	Water Reclamation Plant
WRRRA	Waste Reuse and Recycling Act
WSA	Water Supply Assessment
WWRF	Western Water Recycling Facility
YBP	Years before Present

VI. 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 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): Caltrans Scenic Highways Map – Riverside County (Caltrans, 2019); Lake Mathews – Woodcrest Area Plan Figure 9 “Scenic Highways” (Riverside County, 2020c); Aesthetics section of the Riverside County General Plan EIR (Riverside County, 2020b); Countywide Design Standards and Guidelines (Riverside County, 2014); Google Earth Pro, 2023 (Google Earth, 2023); Project Application Materials.

Findings of Fact:

- a) According to information from the California Department of Transportation (Caltrans, 2019), there are no State-designated Scenic Highways within the Project site’s vicinity. The nearest State-designated Scenic Highway to the Project site is a segment of SR-74 located at the western boundary of the San Bernardino National Forest that provides ingress/egress to the San Bernardino National Forest, located approximately 30 miles east of the Project site (Caltrans, 2019; Google Earth, 2023). Due to distance, intervening development, and topography, the Project site is not visible from this segment of SR-74, and thus would have no effect on views available from this State-designated segment of SR-74.

The eligible State Scenic Highways in the Project vicinity are Interstate 15, located approximately 5.9 miles southwest of the Project site, and State Route 74 (SR-74), located approximately 11.2 miles southeast of the Project site; however, these highways are not officially designated as State Scenic Highways (Caltrans, 2019). In addition, due to distance, intervening development, and topography between the Project site and these state-eligible highways, the Project would not be visible from these highways, as confirmed by a viewshed analysis conducted using Google Earth (Google Earth, 2023). Therefore, Project implementation would have no effect on views available from Interstate 15 or State Route 74. Accordingly, the Project would have no impact on State-designated Scenic Highways.

The LMWAP indicates that the Project site is located in the vicinity of three County “Eligible” scenic highways. The Project site is located approximately 1,001 feet north of El Sobrante Road, approximately 1.6-mile east of the nearest County “Eligible” segment of La Sierra Avenue, and 2.4 miles north of the nearest County “Eligible” segment Cajalco Road, all of which are designated as County “Eligible” scenic highways (Riverside County, 2020c, Figure 9). Due to the 2.4-mile distance and intervening topography, and based on a viewshed analysis conducted in Google Earth, the Project would not be prominently visible from Cajalco Road; thus, the Project would result in no impacts to views from this County- Eligible Scenic Highway (Google Earth, 2023).

Although the Project site is proximal to El Sobrante Road and La Sierra Avenue, due to the rolling terrain of the surrounding area and existing intervening development and landscaping/vegetation, the Project site is not prominently visible from either of these County Eligible Scenic Highways. Based on a viewshed analysis conducted in Google Earth, the Project site would be only intermittently visible along the segment of El Sobrante Road between McAllister Street and Vista Del Lago Drive, and would be visible at a distance from a short segment of La Sierra Avenue located south of El Sobrante Road; the Project site would not be visible along remaining segments of El Sobrante Road and La Sierra Avenue (Google Earth, 2023). The Project’s access roadway connection to El Sobrante Road represents the primary impact to views along El Sobrante Road, but this access road would not substantially affect the scenic integrity of views along El Sobrante Road as the majority of scenic views in this area are oriented towards Lake Mathews and away from the Project site. Given that the Project vicinity already is characterized by improved roadways, construction of the proposed access point along El Sobrante Road would not result in a substantial, adverse effect to these County-Eligible Scenic Highways. The existing improved roadways in the vicinity of the Project do not impact trees, rock outcroppings, or any other scenic resources. Additionally, viewshed analyses conducted in Google Earth show that the majority of views available from the above-described segments of El Sobrante Road and McCallister Street are of the eastern portions of the Project site, which are proposed for limited development with trails, recreational uses, community gardens, community orchards, grazing areas, trails, and rehabilitated vegetation, none of which would adversely affect the viewshed (Google Earth, 2023). Furthermore, it should be noted that both El Sobrante Road and McAllister Street are only “County-Eligible Scenic Highways,” and are not officially designated as County Scenic Highways by the County’s General Plan. There are no components of the proposed Project that would substantially or adversely affect views available along nearby County Eligible Scenic Highways. Accordingly, implementation of the proposed Project would result in less-than-significant impacts to County-designated scenic highways.

- b) The Multipurpose Open Space Element of the Riverside County General Plan defines scenic vistas as “...points, accessible to the general public, that provide a view of the countryside” (Riverside County, 2020a, p. OS-52). The Project site does not afford any prominent scenic vistas or views open to the public. The only visually prominent resources within the Project Site’s viewshed are distant views of surrounding hills and mountains, including the Lake Mathews Estelle Mountains Reserve approximately 5.7 miles to the south, Santa Ana Mountains approximately 11 miles to the south, and the San Gabriel Mountains

approximately 24 miles to the north that are highly common within the Project vicinity, and are not unique to the Project site. Additionally, although Lake Mathews represents a scenic resource within the Project's vicinity, direct views of Lake Mathews generally only are available south of El Sobrante Road, and development of the Project site as proposed would not obstruct any scenic views of Lake Mathews.

The Project site is currently undeveloped with remnants of a cleared citrus groves and earthen irrigation furrows in the northwestern portion of the property, a water tank storage shed on the southern boundary of the site, and an existing water pumping station (operated by the Western Municipal Water District and Not a Part of the Project site) is located directly adjacent to the northern boundary of the Project site. Under existing conditions, the majority of the site has been disturbed by weed abatement activities (i.e., disking) conducted for fire abatement purposes, and unpaved and unplanned trails and roadways are located throughout the entire Project site. Several rock outcroppings occur throughout the site and are primarily located within the southwestern portions of the Project site. These rock outcroppings do not form a prominent component of the surrounding viewshed because they are scarcely visible from off-site locations. The Project proposes to preserve several rock outcroppings in the open space conservation areas on-site. Nevertheless, implementation of the proposed Projects would result in the permanent removal of rock outcroppings from the portions of the site proposed for development during grading activities. These rock outcroppings are not prominently visible from off-site locations, and the outcroppings themselves are not a prominent scenic resource within the Project's viewshed. Thus, the removal of these rock outcroppings from the Project site would not result in substantial damage to the surrounding viewshed and impacts due to their removal would be less than significant.

Development of the Project site would not substantially obstruct any prominent scenic vistas or scenic resources. Given the height of the proposed structures (i.e., maximum of 35 feet per the County Wide Standards), development on-site would not obstruct views of scenic resources in the region, particularly because the Project site only affords very distant views of major topographic elements within the surrounding viewshed and because views of Lake Mathews are generally not available north of El Sobrante Road (Google Earth, 2023).

Newly developed communities known as Citrus Heights, Tramonte and Highland Grove 3 border the project site to the north and are visible from the public by motorist and multipurpose trail users along adjacent streets. Development as proposed by the Project would be required to comply with the County Wide Design Guidelines for the proposed Project, which contain standards related to architecture, landscaping, walls/fences, and other elements of the physical environment, and provide specific guidance for future implementing developments. Mandatory compliance with the Design Guidelines and development standards of the proposed zone would ensure that the Project is developed in such a fashion so as not to create an aesthetically offensive site open to public view.

Thus, because the proposed Project would not be visible from any designated scenic corridors, would not obstruct publicly-available views of major visual elements (e.g., mountains, Lake Mathews, etc.) within the viewshed, and would not result in an aesthetically offensive site open to public view, impacts to scenic vistas and resources would be less than significant.

- c) The project site is located within a non-urbanized area of the County designated with the Rural Community foundation component of the County General Plan land use designation. The area surrounding the Project site is transitioning from agricultural land uses to medium and low-density suburban developments and is characterized as a rural and suburban area. The Project site is surrounded by a mixture of rural agricultural uses, housing tracts under construction, and undeveloped or underutilized parcels of land. All development on the Project site would be required to comply with the Countywide Design Standards and Guidelines (Riverside County, 2014), which have been crafted to ensure

that future development on-site is aesthetically pleasing and not visually offensive. Compliance with the Design Standards and Guidelines would ensure that the Project is developed in such a fashion so as not to degrade the visual character or quality of the Project site or its surroundings. The Project would be developed in a manner that is consistent with the transitioning suburban character of the surrounding area, including existing residential developments to the west, residential development under construction to the north, and planned residential uses to the north and southwest of the Project site. The project is consistent with the Design Guidelines set forth within the El Sobrante Policy as defined with the LMWAP which encourages the clustering of developable lots to reduce the projects ground disturbance, consistent with the projects proposed and applicable zoning standards. In addition, the Project would be developed in a manner that is not visually offensive either on-site or within the context of surrounding uses and planned development. There are no components of the Project that would result in the substantial degradation of the visual character or quality of the Project site and surrounding areas. Accordingly, impacts due to the degradation of the existing visual character or quality of the Project site and its surroundings would be less than significant.

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): Riverside County Ord. No. 655 (Regulating Light Pollution) (Riverside County, 2023); Riverside County General Plan EIR Figure "Mt. Palomar Night Time Lighting Policy Area" (Riverside County, 2020b); Project Application Materials

Findings of Fact:

- a) According to the Riverside County General Plan EIR, the Project site is not located within the Mt. Palomar Nighttime Lighting Policy Area as defined by Ordinance No. 655 (Riverside County, 2023, Ord. No. 655). The Project site is located approximately 47 miles northwest of the Mt. Palomar Observatory and falls outside of the Policy Area's 45-mile radius from the Observatory (45 miles represents the maximum distance in which lighting could adversely affect nighttime observations at the Mt. Palomar Observatory). Therefore, the proposed Project has no potential to create substantial lighting levels that could adversely affect the operation of this facility. Accordingly, the proposed Project has no potential to interfere with the nighttime use of the Mt. Palomar Observatory. No impact would occur as a result of implementation of the Project.

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
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): Site reconnaissance and photography (Adkan, 2023); Riverside County Ord. No. 915 (Regulating Outdoor Lighting) (Riverside County, 2023); Project Application Materials

Findings of Fact:

- a) The Project site does not contain any artificial light sources or sources of glare under existing conditions (Adkan 2023). Implementation of the proposed Project would include exterior lighting elements. The Project is a proposed residential community, and all lighting elements that would be installed would be of low intensity and residential in character, primarily consisting of lights installed on residential lots, street lights, and would not create a new source of substantial light or glare that could adversely affect day or nighttime views in the area. Additionally, all lighting elements on-site would be required to comply with Riverside County Outdoor Lighting Standards (Ordinance No. 915). Ordinance No. 915 specifies the requirements of outdoor luminaries, including location, shielding, and direction such that outdoor lighting impacts would be less-than-significant (Riverside County, 2023, Ord. No. 915). Mandatory compliance with the County's ordinance would ensure that the proposed Project does not produce a new source of substantial light or glare from artificial lighting sources that would adversely affect day or nighttime views in the area. Additionally, there are no components of the proposed Project that would involve building materials that could create substantially amounts of glare. Therefore, impacts would be less than significant.
- b) The Project would be required to comply with Riverside County Ordinance No. 915, which generally would preclude significant lighting impacts to surrounding properties. Ordinance No. 915 specifies the requirements of outdoor luminaries, including location, shielding, and direction such that outdoor lighting impacts are less-than-significant (Riverside County, 2023 Ord. No. 915). As a proposed residential community, lighting elements that would be installed would be of low intensity and residential in character and would primarily consist of lights installed on individual residential lots, and street lights. The proposed lighting elements would be similar to surrounding existing residential developments located approximately 0.5-mile west, and 0.5-mile north of the Project site, and proposed residential developments located immediately adjacent to the Project's northern and western boundaries. Project-related lighting would not result in the exposure of on- or off-site residential properties to unacceptable light levels. Thus, a less-than-significant impact would occur.

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): California Department of Conservation (CDC) – CA Important Farmland Series Maps (CDC, 2020); Riverside County Information Technology – Map My County (RCIT, 2023); Riverside County Williamson Act Map (CDC, 2023); Riverside County Ord. No. 625 (Right-To-Farm) (Riverside County, 2023); Project Application Materials.

Findings of Fact:

- a) According to the Farmland Mapping and Monitoring Program (FMMP), the Project contains 36.55 acres of "Farmland of Local Importance." Of the farmland types identified within the FMMP, only "Prime Farmland" and "Unique Farmland" are considered to comprise "Important Farmland." (CDC, 2020) With implementation of the Project, it can be assumed that active agricultural uses within the portion of the site designated as "Farmland of Local Importance" would be eliminated, however project impacts due to the elimination of the active agricultural uses would not impact current active agricultural uses within any areas of the FMMP identified as "Prime Farmland" and "Unique Farmland." Thus, a less-than-significant impact would occur.
- b) The Project site is currently zoned for agricultural land uses (Light Agriculture, A-1-10). The Project would result in a change to the zoning designation of the Project site from A-1-10 to One-family Dwellings (R-1-10,000) in order to accommodate the proposed land uses. Although the Project would eliminate agricultural uses, upon implementation of the Project and approval of the Project's Change of Zone, any potential inconsistency with agricultural zoning on-site would be eliminated. Therefore, impacts related to a conflict with agricultural zoning on-site would be less than significant.

Properties abutting the Project site to the west, and south of the Project site are zoned "Light Agriculture (A-1-10)" which are agricultural zoning designations. Accordingly, the Project would be subject to Riverside County Ordinance No. 625, the "Riverside County Right-to-Farm Ordinance," which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land where the landowner desires to continue agricultural operations in spite of urbanization that may occur in the surrounding areas. Mandatory compliance with Ordinance No. 625

would ensure that Project-related construction and operational activities would not result in a conflict with existing agricultural operations on lands zoned for agricultural use in the surrounding area.

Additionally, the project site is located within an Agricultural Preserve (El Sobrante No. 1). The agricultural preserve precludes use of the Project site for any use other than agriculture uses. The Project proposes an Agricultural Preserve Diminishment to remove the Project site from the El Sobrante No. 1 Agricultural Preserve area (AGD250001). Approval of AGD250001 by the Riverside County Board of Supervisors would eliminate any potential inconsistency that may result from future development of the subject property with residential land uses. Accordingly, impacts due to a conflict with the site’s designation within the El Sobrante No. 1 Agricultural Preserve would be less than significant.

- c) The Project is located within 300 feet of agriculturally-zoned properties. Properties to the east and south of the Project site are zoned “Light Agriculture (A-1-10)”, currently exhibiting agricultural uses such as nurseries and farming operations. Accordingly, the Project would be subject to Riverside County Ordinance No. 625, the “Right-to-Farm” Ordinance, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land where the landowner desires to continue agricultural operations in spite of urbanization that may occur in the surrounding areas. Mandatory compliance with Ordinance No. 625 would ensure that Project-related construction and operational activities would not indirectly cause or contribute to the conversion of off-site farmland to non-agricultural use. Furthermore, although located within 300 feet of agriculturally zoned properties, agricultural uses have not occurred within or surrounding the project site for the last approximately 15 years (Google Earth, 2023). Impacts would be less than significant.
- d) “Farmland” is defined in Section II (a) of Appendix G of the State CEQA Guidelines to mean Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As described under (a), above, the Project site contains 36.55 acres of “Farmland of Local Importance”, which would effectively be converted to permanent non-agricultural use. However, assuming mandatory compliance with County Ordinance No. 625, as discussed above, there are no changes in the existing environmental components of the Project that would result in the conversion of other off-site Farmland to non-agricultural uses. Additionally, all other properties to the east, west, and south of the Project site remain within the El Sobrante No. 1 Agricultural Preserve and maintaining the right to operate and conduct agricultural uses through the Williamson Act land conservation contracts. Accordingly, impacts would be less than significant.

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))?

☐	☐	☐	☒
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	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Information Technology – Map My County (RCIT, 2024); Riverside County General Plan Figure OS-4a (Riverside County, 2020a); Project Application Materials.

Findings of Fact:

- a) The Project site is not zoned as forest land. There are no lands within the Project site's vicinity that are zoned for forest land, timberland, or Timberland Production (RCIT, 2024). As such, there is no potential for the Project to conflict with or cause the rezoning of such lands. Therefore, no impacts would occur.
- b) There is no forest land on the Project site or surrounding area (Riverside County, 2020a, Figure OS-4a). There would be no potential for the proposed Project to cause the loss of forest land or the conversion of forest land to non-forest use. Therefore, no impacts would occur.
- c) Due to the absence of forest lands on the Project site and in its vicinity, there is no potential for the proposed Project to cause changes in the existing environment which, due to their location or nature, could result in the conversion of forest land to non-forest use. Therefore, no impacts would occur.

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
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): Source: SCAQMD 2022 Air Quality Management Plan (SCAQMD, 2022); California Air Resources Board Area Designation Maps (CARB, 2022); Google Earth Pro (Google Earth, 2023); Riverside County Information Technology – Map My County (RCIT, 2023); SCAQMD Rule 402 (SCAQMD, 1976); Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis (Vista Environmental, 2024); Project Application Materials.

Findings of Fact:

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

Currently, state and federal air quality standards are exceeded in most parts of the SoCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the state and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as, explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2022 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS) and updated emission inventory methodologies for various source categories. The Project's consistency with the AQMP will be determined using the 2022 AQMP as discussed below. Criteria for determining consistency with the 2022 AQMP are defined in Chapter 12, Section 12.2, and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993).

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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AQMP Consistency Criterion No. 1: The proposed Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Based on the air quality modeling analysis, short-term regional construction air emissions would not result in significant impacts based on SCAQMD regional thresholds of significance or local thresholds of significance. The ongoing operation of the proposed project would generate air pollutant emissions that are inconsequential on a regional basis and would not result in significant impacts based on SCAQMD thresholds of significance. The analysis for long-term local air quality impacts showed that local pollutant concentrations would not be projected to exceed the air quality standards. Therefore, a less than significant long-term impact would occur and no mitigation would be required. (Vista Environmental, 2024, p.54)

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

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed project are based on the same forecasts as the AQMP. The AQMP is developed through use of the planning forecasts provided in the RTP/SCS (Connect SoCal) and FTIP (2019 FTIP). The RTP/SCS is a major planning document for the regional transportation and land use network within Southern California. The RTP/SCS is a long-range plan that is required by federal and state requirements placed on SCAG and is updated every four years. The FTIP provides long-range planning for future transportation improvement projects that are constructed with state and/or federal funds within Southern California. Local governments are required to use these plans as the basis of their plans for the purpose of consistency with applicable regional plans under CEQA. For this project, the County of Riverside's Lake Matthews/Woodcrest Area Plan Land Use Plan defines the assumptions that are represented in AQMP.

The westerly portion of the project site currently has a land use designated as Rural Community – Low Density Residential and the eastern portion is designated as Rural Community – Very Low Density Residential in the Area Plan. The proposed project with 73 homes has been designed to meet the allowed number of residential units under the existing Riverside County General Plan, more particular the number of units allowed under the El Sobrante Policy as outlined within the Lake Matthew/Woodcrest Area Plan. As such, the proposed project is not anticipated to exceed the AQMP assumptions for the project site and is found to be consistent with the AQMP for the second criterion. (Vista Environmental, 2024, p. 54)

AQMP Consistency Conclusion

The project would not have the potential to result in or cause NAAQS or CAAQS violations. The Project's development intensity is consistent with the development intensities allowed by the County General Plan. A less-than-significant impact will occur in relation to implementation of the AQMP. (Vista Environmental, 2024, p.54)

- b) The SCAQMD has published a report on how to address cumulative impacts from air pollution: White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (<http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf>). In this report the AQMD clearly states (Page D-3):

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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“...the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or Environmental Impact Report (EIR). The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility- wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.”

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD’s recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable. The following section calculates the potential air emissions associated with the construction and operations of the proposed project and compares the emissions to the SCAQMD standards. (Vista Environmental, 2024, p.55)

Construction Emissions

The construction activities for the proposed project are anticipated to include site preparation and grading up to 29 acres of the 36.55-acre project site, building construction of 73 single-family home, paving of the onsite roads and driveways, sidewalks and hardscapes, and application of architectural coatings.

The CalEEMod model has been utilized to calculate the construction-related emissions from the proposed project. The daily construction-related criteria pollutant emissions from the proposed project by season and year of construction activities are shown below in the Table 6.1 below:

Table 6.1 - Construction-Related Criteria Pollutant Emissions

Season and Year of Construction	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO ₂	PM10	PM2.5
Daily Winter Maximum						
Winter 2025 ¹	3.47	78.3	111	0.85	16.1	4.92
Winter 2026	3.21	33.5	30.2	0.10	5.87	2.61
Winter 2027	1.39	9.75	14.3	0.03	0.75	0.41
Winter 2028	28.4	0.83	1.36	<0.01	0.08	0.03
Daily Summer Maximum						
Summer 2026	1.19	10.2	14.9	0.03	0.79	0.45
Summer 2027	1.14	9.72	14.8	0.03	0.75	0.41
Maximum Daily Construction Emissions	28.4	78.3	111	0.85	16.1	4.92
SCQAMD Regional Thresholds	75	100	550	150	150	55
SCAQMD Local Thresholds²	--	277	1,709	--	19	8
Exceeds Threshold?	No	No	No	No	No	No

Notes:

¹ Includes emissions from blasting. Based on 2,000 cubic yards of rock over a 10,000 square foot area.

² The nearest sensitive receptor is a ranch home located as near as 440 feet (134 meters) south of the project site. As such, the 100 meter and 200 meter thresholds were interpolated to find the 134 meter thresholds. Calculated from SCAQMD's Mass Rate Look-up Tables for two acres in Air Monitoring Area 23, Metropolitan Riverside County.

Source: CalEEMod Version 2022.1.

Table 6.1 shows that none of the analyzed criteria pollutants would exceed either the regional or local emissions thresholds during construction of the proposed project. Therefore, a less than significant regional or local air quality impact would occur from construction of the proposed project. (Vista Environmental, 2024, p.56)

Operational Emissions

The on-going 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, emissions from energy usage, onsite area source emissions created from the on-going use of the proposed project. The following section provides an analysis of potential long-term air quality impacts due to regional air quality and local air quality impacts with the on-going operations of the proposed project.

Operations-Related Regional Criteria Pollutant Analysis

The operations-related regional criteria air quality impacts created by the proposed project have been analyzed through use of the CalEEMod model. The worst-case summer or winter VOC, NOx, CO, SO₂, PM10, and PM2.5 daily emissions created from the proposed project's long-term operations have been calculated and are summarized below in Table 6.2 below:

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Table 6.2 - Operational-Regional Criteria Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO ₂	PM10	PM2.5
Mobile Sources ¹	2.79	2.92	25.8	0.07	6.07	1.57
Area Sources ²	3.71	0.04	4.14	<0.01	<0.01	<0.01
Energy Usage ³	0.00	0.00	0.00	0.00	0.00	0.00
Total Emissions	6.50	2.96	29.9	0.07	6.07	1.57
SCQAMD Regional Operational Thresholds	55	55	550	150	150	55
SCAQM Local Operational Thresholds⁴	--	303	3,223	--	13	4
Exceeds Threshold?	No	No	No	No	No	No

Notes:

1 Mobile sources consist of emissions from vehicles and road dust.

2 Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

3 Energy usage consists of emissions from natural gas usage. PDF-1 requires the project to be all-electric, as such no energy usage emissions would be created from the proposed project.

4 The nearest sensitive receptor is a ranch home located as near as 440 feet (134 meters) south of the project site. As such, the 100 meter and 200 meter thresholds were interpolated to find the 134 meter thresholds. Calculated from SCAQMD's Mass Rate Look-up Tables for two acres in Air Monitoring Area 23, Metropolitan Riverside County.

Source: Calculated from CalEEMod Version 2022.1.

The data provided in Table 6.2 shows that none of the analyzed criteria pollutants would exceed the regional or local emissions thresholds. Therefore, less than significant regional air quality impacts would occur from operation of the proposed project. (Vista Environmental, 2024, p.56)

Friant Ranch Case

In *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (also referred to as “Friant Ranch”), the California Supreme Court held that when an EIR concluded that when a project would have significant impacts to air quality impacts, an EIR should “make a reasonable effort to substantively connect a project’s air quality impacts to likely health consequences.” In order to determine compliance with this Case, the Court developed a multi-part test that includes the following:

- 1) The air quality discussion shall describe the specific health risks created from each criteria pollutant, including diesel particulate matter.

This Analysis details the specific health risks created from each criterion. In addition, the specific health risks created from diesel particulate matter is included as part of this analysis. As such, this analysis meets the part 1 requirements of the Friant Ranch Case.

- 2) The analysis shall identify the magnitude of the health risks created from the Project. The Ruling details how to identify the magnitude of the health risks. Specifically, on page 24 of the ruling it states “The Court of Appeal identified several ways in which the EIR could have framed the analysis so as to adequately inform the public and decision makers of possible adverse health effects. The County could have, for example, identified the Project’s impact on the days of nonattainment per year.”

The Friant Ranch Case found that an EIR's air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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analysis cannot be provided. As noted in the Brief of Amicus Curiae by the SCAQMD in the Friant Ranch case (<https://www.courts.ca.gov/documents/9-s219783-ac-south-coast-air-quality-mgt-dist-041315.pdf>) (Brief), SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes. The SCAQMD discusses that it may be infeasible to quantify health risks caused by projects similar to the proposed Project, due to many factors. It is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). The Brief states that it may not be feasible to perform a health risk assessment for airborne toxics that will be emitted by a generic industrial building that was built on "speculation" (i.e., without knowing the future tenant(s)). Even where a health risk assessment can be prepared, however, the resulting maximum health risk value is only a calculation of risk, it does not necessarily mean anyone will contract cancer as a result of the Project. The Brief also cites the author of the CARB methodology, which reported that a PM2.5 methodology is not suited for small projects and may yield unreliable results. Similarly, SCAQMD staff does not currently know of a way to accurately quantify ozone-related health impacts caused by NOx or VOC emissions from relatively small projects, due to photochemistry and regional model limitations. The Brief concludes, with respect to the Friant Ranch EIR, that although it may have been technically possible to plug the data into a methodology, the results would not have been reliable or meaningful.

On the other hand, for extremely large regional projects (unlike the proposed project), the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 pounds per day of NOx and 89,180 pounds per day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to ozone. As shown above in Table 6.1, project-related construction activities would generate a maximum of 28.4 pounds per day of VOC and 78.3 pounds per day of NOx and as shown above in Table 6.2, operation of the proposed project would generate 6.5 pounds per day of VOC and 2.96 pounds per day NOx. The proposed project would not generate anywhere near these levels of 6,620 pounds per day of NOx or 89,190 pounds per day of VOC emissions. Therefore, the proposed project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level.

Notwithstanding, this analysis does evaluate the proposed project's localized impact to air quality for emissions of CO, NOx, PM10, and PM2.5 by comparing the proposed project's onsite emissions to the SCAQMD's applicable LST thresholds. As evaluated in this analysis, the proposed project would not result in emissions that exceeded the SCAQMD's LSTs. See comparison Table 6.3, below:

Table 6.3 - Operational-Regional Criteria Pollutant Emissions Threshold Summary

	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO ₂	PM10	PM2.5
Total Emissions	6.50	2.96	29.9	0.07	6.07	1.57
SCQAMD Regional Operational Thresholds	55	55	550	150	150	55
SCAQM Local Operational Thresholds¹	--	303	3,223	--	13	4
Exceeds Threshold?	No	No	No	No	No	No

Notes:

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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4 The nearest sensitive receptor is a ranch home located as near as 440 feet (134 meters) south of the project site. As such, the 100 meter and 200 meter thresholds were interpolated to find the 134 meter thresholds. Calculated from SCAQMD's Mass Rate Look-up Tables for two acres in Air Monitoring Area 23, Metropolitan Riverside County.

Source: Calculated from CalEEMod Version 2022.1.

Therefore, the proposed project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NOx, PM10, and PM2.5. (Vista Environmental, 2024, p.57 – p.58)

Operations-Related Local Air Quality Impacts

Project-related air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. The proposed project has been analyzed for the potential local CO emission impacts from the project-generated vehicular trips and from the potential local air quality impacts from on-site operations. The following analyzes the vehicular CO emissions and local impacts from on-site operations.

Local CO Hotspot Impacts from Project-Generated Vehicular Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the State and Federal CO standards of 20 ppm over one hour or 9 ppm over eight hours.

At the time of the 1993 Handbook, the Air Basin was designated nonattainment under the CAAQS and NAAQS for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the Air Basin and in the state have steadily declined. In 2007, the Air Basin was designated in attainment for CO under both the CAAQS and NAAQS. SCAQMD conducted a CO hot spot analysis for attainment at the busiest intersections in Los Angeles during the peak morning and afternoon periods and did not predict a violation of CO standards. Since the nearby intersections to the proposed project are much smaller with less traffic than what was analyzed by the SCAQMD, no local CO Hotspot are anticipated to be created from the proposed project and no CO Hotspot modeling was performed. Therefore, a less than significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed project. (Vista Environmental, 2024, p.58-p.59)

- c) The local concentrations of criteria pollutant emissions produced in the nearby vicinity of the proposed project, which may expose sensitive receptors to substantial concentrations have been calculated above in Section 6(b) for both construction and operations, which are discussed separately below. The discussion below also includes an analysis of the potential impacts from toxic air contaminant emissions. The nearest sensitive receptors to the project site are the residents at the ranch homes located as near as 440 feet south of the project site and at the single-family homes located as near as 500 feet northeast of the project site.

Construction-Related Sensitive Receptor Impacts

The construction activities for the proposed project are anticipated to include site preparation and grading of 29 acres of the 36.55-acre project site, building construction of 73 single-family home, paving of the onsite roads and driveways, sidewalks and hardscapes, and application of architectural coatings.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Construction activities may expose sensitive receptors to substantial pollutant concentrations of localized criteria pollutant concentrations and from toxic air contaminant emissions created from onsite construction equipment, which are described below. (Vista Environmental, 2024, p.59)

Local Criteria Pollutant Impacts from Construction

The local air quality impacts from construction of the proposed project have been analyzed above in Section 6(b) and found that the construction of the proposed project would not exceed the local NOx, CO, PM10 and PM2.5 thresholds of significance. Therefore, construction of the proposed project would create a less than significant construction-related impact to local air quality and no mitigation would be required. (Vista Environmental, 2024, p.59)

Toxic Air Contaminants Impacts from Construction

The greatest potential for toxic air contaminant emissions would be related to diesel particulate matter (DPM) emissions associated with heavy equipment operations during construction of the proposed project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of “individual cancer risk”. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. It should be noted that the most current cancer risk assessment methodology recommends analyzing a 30-year exposure period for the nearby sensitive receptors.

Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the proposed project would not result in a long-term (i.e., 30 or 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than five minutes, requires equipment operators to label each piece of equipment and provide annual reports to CARB of their fleet’s usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0, Tier 1 or Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. Therefore, due to the limitations in off-road construction equipment DPM emissions from implementation of Section 2448, a less than significant short-term TAC impacts would occur during construction of the proposed project from DPM emissions.

As such, construction of the proposed project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations. (Vista Environmental, 2024, p.60)

Operations-Related Sensitive Receptor Impacts

The on-going operations of the proposed project may expose sensitive receptors to substantial pollutant concentrations of local CO emission impacts from the project-generated vehicular trips and from the potential local air quality impacts from onsite operations. The following analyzes the vehicular CO emissions. Local criteria pollutant impacts from onsite operations, and toxic air contaminant impacts.

Local CO Hotspot Impacts from Project-Generated Vehicle Trips

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential impacts to sensitive receptors. The analysis provided above in Section 6(b) shows that no local CO Hotspots are anticipated to be created at any nearby intersections from the vehicle traffic generated by the proposed project. Therefore, operation of the proposed project would result in a less than significant exposure of offsite sensitive receptors to substantial pollutant concentrations. (Vista Environmental, 2024, p.60)

Local Criteria Pollutant Impacts from Onsite Operations

The local air quality impacts from the operation of the proposed project would occur from onsite sources such as architectural coatings and landscaping equipment. The analysis provided above in Section 6(b) found that the operation of the proposed project would not exceed the local NOx, CO, PM10 and PM2.5 thresholds of significance. Therefore, the on-going operations of the proposed project would create a less than significant operations-related impact to local air quality due to on-site emissions and no mitigation would be required. (Vista Environmental, 2024, p.60)

Operations-Related Toxic Air Contaminant Impacts

Particulate matter (PM) from diesel exhaust is the predominant TAC in most areas and according to The California Almanac of Emissions and Air Quality 2013 Edition, prepared by CARB, about 80 percent of the outdoor TAC cancer risk is from diesel exhaust. Some chemicals in diesel exhaust, such as benzene and formaldehyde have been listed as carcinogens by State Proposition 65 and the Federal Hazardous Air Pollutants program. Due to the nominal number of diesel truck trips that are anticipated to be generated by the on-going operation of the proposed single-family homes, a less than significant TAC impact would be created from the on-going operations of the proposed project and no mitigation would be required. (Vista Environmental, 2024, p.61)

Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations and would be a less than significant impact.

- d) Generally, the impact of an odor results from a variety of factors such as frequency, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to an odor in the ambient environment. The intensity refers to an individual's or group's perception of the odor strength or concentration. The duration of an odor refers to the elapsed time over which an odor is experienced. The offensiveness of the odor is the subjective rating of the pleasantness or unpleasantness of an odor. The location accounts for the type of area in which a potentially affected person lives, works, or visits; the type of activity in which he or she is engaged; and the sensitivity of the impacted receptor.

Sensory perception has four major components: detectability, intensity, character, and hedonic tone. The detection (or threshold) of an odor is based on a panel of responses to the odor. There are two types of thresholds: the odor detection threshold and the recognition threshold. The detection threshold is the lowest concentration of an odor that will elicit a response in a percentage of the people that live and work in the immediate vicinity of the project site and is typically presented as the mean (or 50 percent of the population). The recognition threshold is the minimum concentration that is recognized as having a characteristic odor quality, this is typically represented by recognition by 50 percent of the population. The intensity refers to the perceived strength of the odor. The odor character is what the substance smells

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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like. The hedonic tone is a judgment of the pleasantness or unpleasantness of the odor. The hedonic tone varies in subjective experience, frequency, odor character, odor intensity, and duration. Potential odor impacts have been analyzed separately for construction and operations below. (Vista Environmental, 2024, p.61)

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints and solvents and from emissions from diesel equipment. Standard construction requirements that limit the time of day when construction may occur as well as SCAQMD Rule 1108 that limits VOC content in asphalt and Rule 1113 that limits the VOC content in paints and solvents would minimize odor impacts from construction. As such, the objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the project site's boundaries. Through compliance with the applicable regulations that reduce odors and due to the transitory nature of construction odors, a less than significant odor impact would occur and no mitigation would be required. (Vista Environmental, 2024, p.61)

Operations-Related Odor Impacts

The proposed project would consist of the development of a single-family residential development. The proposed project would not contain any known sources of odors. Therefore, no significant impact related to odors would occur during the on-going operations of the proposed project. (Vista Environmental, 2024, p.62)

Therefore, the proposed project would not result in other emissions, such as those leading to odors adversely affecting a substantial number of people and would be a less than significant impact.

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?

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☒
☐
☐

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

☐
☒
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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

☐
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☐
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	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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): Riverside County Information Technology – Map My County (RCIT, 2023); Multiple Species Habitat Conservation Plan (MSHCP) Conservation Summary Report Generator (RCTLMA, 2023); Riverside County Transportation Land Management Western MSHCP (RCTLMA, 2004); Site reconnaissance and photography (Adkan, 2023); Riverside County Ordinance No. 559 (Regulating the Removal of Trees) (Riverside County, 2023); Riverside County Ordinance No. 897 (Regulating Noise) (Riverside County, 2023); Riverside County Ordinance No. 859 (Water Efficient Landscape) (Riverside County, 2023); Crotch’s Bumble Bee Site Assessment (FCS, 2024a); Biological Resources Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis (FCS, 2024b); Aquatic Resources Delineation Report (FCS, 2024); Project Application Materials

Findings of Fact:

- a) The project site is within the plan area for the Western Riverside MSHCP and is thus subject to consistency with the plan. The project site is located adjacent to the Lake Mathews/Estelle Mountain Reserve, which is Public – Quasi-Public (PQP) Conserved Land under the MSHCP. Per Section 6.1.4 of the MSHCP Final Plan, Volume 1, projects adjacent to Conservation Areas are required to implement Guidelines Pertaining to the Urban/Wildlands Interface to control potentially adverse effects from affecting the integrity of those areas. Further, as with most projects within the MSHCP plan area, an MSHCP Consistency Analysis is required to evaluate project consistency with the goals and requirements of the MSHCP. First Carbon Solutions (FCS) and South Environmental, the project biologists, evaluated the proposed project’s consistency with MSHCP Reserve assembly requirements, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidance Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs and Procedures) to ensure compliance with guidelines outlined in the plan.

MSHCP Consistency Analysis

MSHCP Reserve Assembly

The project site is not located within an area slated for Existing or Pending Conservation. The project site does not feature Avoidance Areas or areas that must be protected by or proposed to be protected by deed restriction. Current conditions and full development of the approximately 30.56-acre project site would not provide for any contributions to Undeveloped Areas Potentially Available for Future Conservation.

MSHCP Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools)

Riparian Riverine Areas

A total of 1.41 acres of Riparian habitat occurs on the project site in the form of mulefat thickets (CDFW Natural Community Code 63.510.00) and Goodding’s Willow-Red Willow Riparian Woodland and Forest (CDFW Natural Community Code 61.216.00). The Riparian habitat is located in and adjacent to Drainage A that borders the southern boundary of the project site. The mulefat thickets community is not considered sensitive natural community by the CDFW and is ranked S4. The Goodding’s Willow-Red Willow Riparian Woodland and Forest is considered a sensitive natural community by the CDFW and is ranked S3. The presence of riparian habitat on the project site requires that habitat assessments and, if habitat is suitable, focused surveys for riparian bird species, (least Bell’s vireo, southwestern willow flycatcher, and yellow-billed cuckoo) be completed, as discussed further below. (FCS, 2024b, p.62)

A total of 0.26 acre of Riverine habitat occurs on the project site within Drainage A. Drainage A is an incised drainage that conveys intermittent flows in a westward direction prior to exiting the site at the southwestern boundary of the project site. Flows that enter the project site originate from agricultural runoff from the surrounding orchards and seeps within the drainage. (FCS, 2024b, p. 62)

The project has been designed to avoid all impacts to the Drainage A Riverine feature and its associated Riparian habitat. Therefore, there are no anticipated project impacts to MSHCP Riparian/Riverine resources. **Mitigation Measures BIO-4a through BIO-4c** are provided to avoid any potential project impacts to MSHCP Riparian/Riverine resources during the construction phase. (FCS, 2024b, p. 62)

Riparian Birds

The riparian habitat on and adjacent to the project site is situated within a narrow drainage along the northern and eastern boundaries of the project site. The Riparian feature on-site consists of 1.41 acres. Vegetation present in the riparian habitat include mulefat thickets and Goodding’s black willow trees. Characteristic species present include mulefat, Goodding’s black willow, and blue elderberry. (FCS, 2024b, p. 65)

The riparian habitat is a small patch of mostly low-growing species that would be unsuitable for occupancy by western yellow-billed cuckoo (*Coccyzus americanus*), a species that prefers larger or more extensive riparian forests. The riparian habitat patch includes several willows but not in densities preferred by southwestern willow flycatcher (*Empidonax traillii extimus*); thus, it is not suitable for occupancy by this species. The riparian habitat could potentially provide suitable foraging and nesting habitat for least Bell’s vireo. (FCS, 2024b, p. 65)

Focused surveys for least Bell’s vireo were not performed on the project site, South Environmental conducted focused surveys for the least Bell’s vireo between May and July 24, 2024, on the adjacent Highland Grove IV project site. Because the species was detected in riparian habitat similar to that found

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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on the current project site, least Bell’s vireo is assumed to occupy riparian habitat in Drainage A along the southern project site boundary. (FCS, 2024b, p. 65)

As such, the riparian habitat located in the drainage is considered occupied by the least Bell’s vireo. **Mitigation Measures BIO-2a, BIO-2b, and BIO-2c** are provided to avoid potential project impacts to least Bell’s vireo. (FCS, 2024b, p. 65)

As such, the riparian habitat located in the drainage is considered occupied by the least Bell’s vireo. **Mitigation Measures BIO-2a, BIO-2b, and BIO-2c** are provided to avoid potential project impacts to least Bell’s vireo, by ensuring appropriate buffers and limiting construction impacts to the species through reduced activities and noise level controls, as monitored by appropriate consultants.

Vernal Pools

Vernal pools are depressions in areas where a hard underground layer prevents rainwater from draining downward into the subsoils. When rain fills the pools in the winter and spring, the water collects and remains in the depressions. In the springtime the water gradually evaporates away until the pools become completely dry in the summer and fall.⁶¹ In California, vernal pools formed tens of thousands of years ago on ancient alluvial soils. Soils that support vernal pools include extremely impervious clay layers above thick indurated hardpans or cracked basalt that allows water to slowly percolate downward. (FCS, 2024b, p. 65)

According to the NRCS WSS, three soil types are mapped on the project site, all loam soils. One of the soil series mapped on the project site, Cajalco series, is known to support vernal pool habitat under certain conditions.⁶⁴ However, the Cajalco soils on the project site do not have the clay content to support vernal pools, and no vernal pools or features indicative of the historic presence of vernal pools were observed on the project site. Furthermore, the surface soils on the project site have a long history of disturbances due to agricultural use of the site, and vernal pools would not be able to persist under this land use regime.

Therefore, vernal pools are absent from the project site and the proposed project would not be subject to Vernal Pool or Vernal Pool Species requirements under the MSHCP and impacts would be less than significant. (FCS, 2024b, p. 66)

Project Consistency with MSHCP Section 6.1.3 (Protection of Narrow Endemic Plant Species)

Volume I, Section 6.1.3 of the MSHCP requires that within identified Narrow Endemic Plant Species Survey Areas (NEPSSA), site-specific focused surveys for Narrow Endemic Plant Species will be required for all public and private projects where appropriate soils and habitat are present. The project site is not located within an NEPSSA and is not subject to NEPSSA survey requirements. Therefore, the proposed project has no potential to conflict with MSHCP Section 6.1.3 and no impact would occur.

Project Consistency with MSHCP Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface)

The MSHCP Urban/Wildlands Interface Guidelines (UWIG) presented in MSHCP Section 6.1.4 are intended to address indirect effects associated with locating development in proximity to a MSHCP Conservation

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Area. The project site is adjacent to an MSHCP Conservation Area (PQP Lands within Lake Mathews /Estelle Mountain Reserve). Per Section 6.1.4 of the MSHCP Final Plan, Volume 1, projects adjacent to Conservation Areas are required to implement Guidelines Pertaining to the Urban/Wildlands Interface to control potentially adverse effects from affecting the integrity of those areas. To address potential impacts to the Urban/Wildlands Interface, per the MSHCP, the proposed project would implement mitigation measure **Mitigation Measure BIO-6a and BIO-6b**, which would implement BMPs regarding prevention of discharge of chemicals, erosion, unauthorized public access, dumping, night lighting, noise-generating land uses, invasive species, protection of drainage channels, weed abatement, and more. With implementation of **Mitigation Measure BIO-6a and BIO 6b**, impacts would be reduced to less than significant impact.

Project Consistency with MSHCP Section 6.3.2 (Additional Survey Needs and Procedures)

The project site does not occur within a survey area for amphibians, mammals, narrow endemic plant species, and Criteria Area Plant Species, but it does occur within a survey area for burrowing owl and is therefore subject to survey requirements for burrowing owls. Biologists conducted a burrowing owl habitat assessment (Step I of the protocol); a burrow survey (Step II, Part A of the protocol); and on and adjacent (within 500 feet) to the project site, completed focused burrowing owl surveys (Step II, Part B of the protocol). The habitat assessment found that the wild oat and annual brome grassland on and adjacent to the project site supports marginally suitable foraging, burrowing, and nesting habitat for burrowing owls.

The vegetation in this community is very dense over much of the project site, but there are scattered areas of sparse vegetation clearings that would provide suitable habitat for burrowing owls. The burrow survey found numerous California ground squirrel burrows on-site and within the 500 feet east of the site that could serve as suitable nesting habitat for burrowing owls. The focused burrowing owl surveys found that no burrowing owls, nor signs of the species (i.e., whitewash, feathers, pellets, etc.), are present on-site. Burrowing owls have been recorded in the project vicinity, with California Natural Diversity Database (CNDDB) records showing two historical records within 5 miles and 11 recent and two historical records between 5 and 10 miles from the project site.

Although burrowing owls were not detected on-site during the focused surveys, there is a moderate potential for burrowing owls to occupy the project site prior to its development. Construction of the proposed project could potentially impact burrowing owls if burrowing owls are occupying the project site when ground-disturbing construction activities are initiated. Impacts could occur outside of the nesting season (September 1 through January 31) or during the breeding season (February 1 through August 31) of the species.

To address potential impacts to burrowing owls and to be consistent with the MSHCP, the proposed project would implement **Mitigation Measures BIO-1a and BIO-1b**, which would require implementation of burrowing owl pre-construction surveys prior to construction activities and the application of a Burrowing Owl Mitigation Plan if owls are present. With implementation of **Mitigation Measures BIO-1a and BIO-1b**, impacts to burrowing owl would be less than significant.

- b) Least Bell's Vireo

The least Bell’s vireo is state and federally listed as endangered, and is covered under the MSHCP. The least Bell’s vireo is typically associated with dense riparian habitats with a stratified canopy, including southern willow scrub, mule fat scrub, and riparian forest.

Least Bell’s vireo is a passerine bird in the family Vireonidae. This species is a neotropical migrant that breeds in California. This species occurs and nests in willow-dominated, riparian woodland or scrub habitats in the vicinity of water or in dry river bottoms. Least Bell’s vireo is federally and State-listed as an Endangered species. Their nests are protected by the MBTA and Fish and Game Codes pertaining to native nesting avian species. Suitable habitat for this species exists within the riparian drainage along the southern project boundary. There are 13 recent and three historical records within 5 miles of the project site and 29 recent and three historical records between 5 and 10 miles from the project site. (FCS, 2024b, p. 54)

South Environmental conducted focused surveys for the least Bell’s vireo between May 1 and July 24, 2024, on the adjacent Highland Grove IV project site. Because the species was detected in riparian habitat similar to that found on the current project site, least Bell’s vireo is assumed to occupy riparian habitat in Drainage A along the southern project site boundary. (FCS, 2024b, p. 54)

There are no anticipated direct project impacts to occupied riparian habitat or to individual least Bell’s vireos. However, construction of the project could result in indirect noise impacts to nesting least Bell’s vireos if ground-disturbing or vegetation-removing activities are initiated or conducted during the species’ breeding season (March 15 through September 15). Noise impacts caused by construction activities could impact least Bell’s vireos nesting in areas within 500 feet of the activities. (FCS, 2024b, p. 66)

Crotch’s Bumble Bee

Crotch’s bumble bee (CBB) is designated as a State Candidate species under CESA, and has recently been designated as a list of species potentially endangered or threatened under CESA, and is not a covered species under the MSHCP. FCS biologists conducted focused surveys for CBB during the 2025 spring and summer seasons within all areas of suitable habitat within the Project site. The focused CBB surveys followed the methods and guidelines recommended by the CDFW Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species.

FCS’s biologist did not observe CBB during the focused surveys conducted at the Project site in 2025, therefore, the species was confirmed absent. However, due to the recent designation as a list of species potentially endangered or threatened under CESA, if initial vegetation or ground disturbance or tree trimming/encroachment/removal occurs during the bee’s activity period (February through October), the project could potential impact a CBB colony.

The proposed project would achieve MSHCP consistency with respect to potential impacts to burrowing owl, least Bell’s vireo, and Crotch’s Bumble Bee through implementation of **Mitigation Measures BIO-1a and BIO-2b, Mitigations Measures BIO-2a through MM Bio-2c, and Mitigations Measures BIO-7a through MM Bio-7b.**

- c) Provided below is a discussion of the Project’s potential impacts to species identified as a candidate, sensitive, or special species either directly or through habitat modifications:

Special-Status Plants

Within 10 miles of the project site, 46 special-status plant species have been recorded in the CNDDDB on the nine-quadrangle search area of the CNPSEI and in the IPaC query results and were considered in an analysis of their potential to occur on the project site. The potential for occurrence of a species was based on current biological conditions on the project site and presence of suitable habitats, soil types, and proximity and number of occurrences recorded in the CNDDDB. Intensive agricultural land uses and associated previous surface disturbances evident throughout the project site have limited the possibility for persistence and occurrence of most special-status plant species that were considered in the analysis. Most special-status plant species considered in the analysis were determined to have no or low potential to occur on-site due to the absence of suitable habitat or the lack of recent records in the project vicinity. Special-status plant species with moderate to high potential to occur on-site are analyzed further below. (FCS, 2024b, p. 48)

Paniculate Tarplant The paniculate tarplant has a CNPS ranking of 4.2 and is an annual herb found in sandy soils (sometimes) and in vernal mesic soils (usually) in coastal scrub, valley and foothill grassland, and vernal pool communities. Its blooming period is between April and November and occurs within elevations of 82–3,083 feet. The project site supports suitable habitat for this species in the wild oats and annual brome grassland. One individual species was observed on project site during a rare plant survey conducted by FCS Biologist Juliet Simpson on July 3, 2024 (Exhibit 9).⁴² Therefore, this species is considered present on the project site. (FCS, 2024b, p. 48)

Special-Status Wildlife Species

A total of 57 special-status wildlife species were identified as occurring within 10 miles of the project site as recorded in the CNDDDB or listed in the IPaC query results and were considered in an analysis of their potential to occur on the project site. The potential for wildlife to occur on the project site was based on presence of suitable habitats and proximity and recency of occurrences records in the CNDDDB. Numerous special-status wildlife species considered in the analysis were determined to have no or low potential to occur on-site, primarily based on the project site being situated outside of the range of the species or absence of suitable habitat or the lack of recent records in the project vicinity, along with other justification(s) for their exclusion from further discussion. Special-status wildlife species with moderate to high potential to occur on-site are analyzed further below. (FCS, 2024b, p. 51)

The following species were assessed as having moderate to high potential to occur on or adjacent to the project site:

- Red-diamond rattlesnake (*Crotalus ruber*): moderate potential to occur
- Cooper's hawk (*Accipiter cooperii*): moderate potential to occur
- Burrowing owl: moderate potential to occur
- White-tailed kite (*Elanus leucurus*): moderate potential to occur
- Loggerhead shrike (*Lanius ludovicianus*): moderate potential to occur
- Yellow warbler (*Setophaga petechia*): moderate potential to occur
- Least Bell's vireo: assumed present
- Stephens' kangaroo rat (*Dipodomys stephensi*): moderate potential to occur
- Western yellow bat (*Lasiurus xanthinus*): moderate potential to occur
- San Diego black-tailed jackrabbit (*Lepus californicus bennettii*): moderate potential to occur
- Pocketed free-tailed bat (*Nyctinomops femorosaccus*): moderate potential to occur
- Crotch's bumble bee (*Bombus crotchii*): moderate potential to occur

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Red-diamond rattlesnake – The red-diamond rattlesnake is a species that occurs in arid, rocky areas in creosote scrub, coastal sage and Riversidean alluvial fan sage scrub, chaparral, oak and pine woodlands, and grasslands and on cultivated areas. The red-diamond rattlesnake is a California Species of Special Concern and it is covered under the MSHCP. The project site contains suitable habitat for this species within the wild oats and annual brome grassland present on the project site. There are 12 recent and 12 historical records within 5 miles of the project site, and there are 10 recent and 15 historical records between 5 and 10 miles from the project site (Exhibit 9).⁴⁷ This species was not observed during any surveys conducted for the proposed project but has a moderate potential to occur on-site. (FCS, 2024b, p. 53)

Cooper's hawk – Cooper's hawk is a hawk in the family Accipitridae. This species occurs in riparian forests and woodlands throughout California, including urban forests. It prefers patchy wooded areas, such as groves with edges with snags for perching. It nests in dense stands with moderate crown-depths, usually in second-growth conifer stands or in deciduous riparian areas, and usually near streams. Cooper's hawk preys on mid-sized birds such as jays, starlings, and doves, but they also consume small rodents. The species capture prey from cover or while flying quickly through dense vegetation, relying on surprise. The Cooper's hawk is designated as a California Watch List species, and it is covered under the MSHCP. Their nests are protected by the MBTA and California Fish and Game Code pertaining to native nesting avian species. Suitable foraging and nesting habitat for this species is present in the mulefat thickets and other areas containing trees on and adjacent to the project site. There is one recent and one historical record between 5 and 10 miles from the project site (Exhibit 9).⁴⁸ This species was not observed during any surveys conducted for the proposed project but has a moderate potential to occur on-site. (FCS, 2024b, p. 52)

Burrowing Owl – The burrowing owl is an owl in the family Strigidae. Burrowing owls occur in open, dry, annual, or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. This species utilizes, modifies, and nests in burrows created by other species, most notably those of the California ground squirrel but also those excavated by coyotes, American badgers, and other burrowing mammals. Burrowing owl populations are threatened by habitat loss, pesticide use, and ground squirrel eradication programs, which limit suitable burrowing habitat. In October of 2024, the California Fish and Game Commission voted unanimously that listing the western burrowing owl (*Athene cunicularia hypugaea*) was warranted under CESA, and the species was advanced to candidate status. The burrowing owl is designated as a California Species of Special Concern and a federal Bird of Conservation Concern, and it is covered under the MSHCP. Limited take of this species is permitted under the MSHCP under certain conditions; however, their nesting burrows are protected by the MBTA and California Fish and Game Code pertaining to native nesting avian species. The project site is also located within the MSHCP burrowing owl species survey zone, requiring that a habitat assessment and surveys (if habitat is present) for burrows and burrowing owls be performed. Marginally suitable burrowing and nesting habitat for this species is present on the project site within wild oats and annual brome grassland where California ground squirrel burrows occur. Much of the vegetation in this community is too tall and dense to support burrowing and foraging activities of this species. Focused burrowing owl surveys conducted on the project site in 2024 did not detect the species, so this species is considered absent from the project site. There are two historical records within 5 miles and 12 recent and two historical records between 5 and 10 miles from the project site. (FCS, 2024b, p.52-p.53)

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White-tailed kite — The white-tailed kite is a hawk in the family Accipitridae. This species inhabits open habitats such as grasslands, marshes, and farmlands and is often found near agricultural areas. It prefers areas with trees for perching and nesting and forages in open areas that support diurnal rodent populations. Preferred nesting habitat consists of oak woodlands or trees along marsh edges. Suitable nesting substrates include trees or shrubs of moderate height, such as eucalyptus, cottonwoods, toyons, and coyote bush, with the nests placed near the tops of the shrubs or trees. Nesting occurs in February through August with peak activity in March, April, and May. The white-tailed kite is designated as a California Fully Protected species and it is covered under the MSHCP. Their nests are protected by the MBTA and California Fish and Game Code pertaining to native nesting avian species. Suitable foraging habitat for this species is present on-site and trees adjacent to the project site provide potentially suitable nesting habitat. Suitable foraging habitat exists within the wild oats and annual brome grassland on and adjacent to the project site. There is one historical record between 5 and 10 miles from the project site. This species was not observed during any surveys conducted for the proposed project but has a moderate potential to occur on-site. (FCS, 2024b, p.53)

Loggerhead Shrike — The loggerhead shrike is a passerine bird in the family Laniidae. This species inhabits open country with short vegetation and well-spaced shrubs or low trees, particularly those with spines or thorns. They frequent agricultural fields, pastures, old orchards, riparian areas, desert scrublands, savannas, prairies, golf courses, and cemeteries. Loggerhead shrikes were once widely distributed across southern Canada, the contiguous United States, and Mexico; however, their populations have declined significantly since the 1960s. They are considered a California Special Species of Concern and a federal Bird of Conservation Concern. Their nests are protected by the MBTA and Fish and Game Codes pertaining to native nesting avian species. Suitable foraging habitat is present in the wild oats and annual brome grassland on and adjacent to the project site, and suitable nesting habitat is present in trees and shrubs on and adjacent to the project site. There is one historical record between 5 and 10 miles of the project site. This species was not observed during any surveys conducted for the proposed project but has a moderate potential to occur on-site. (FCS, 2024b, p.53)

Yellow Warbler — The yellow warbler is a passerine bird in the family Parulidae. This species is a Neotropical migrant that breeds in California. It inhabits dense, shrubby areas, often near water. It breeds in riparian thickets, especially in willows. They forage predominantly on caterpillars and insects but will also eat berries and other fruits. The yellow warbler is designated as a California Species of Special Concern. Their nests are protected by the MBTA and Fish and Game Codes pertaining to native nesting avian species. Suitable foraging and nesting habitat is present in the mulefat thickets and riparian areas within the drainage along the southern boundary of the project site. There is one recent record between 5 and 10 miles from the project site. This species was not observed during any surveys conducted for the proposed project but has a moderate potential to occur on-site. (FCS, 2024b, p.54)

Least Bell's Vireo — Least Bell's vireo is a passerine bird in the family Vireonidae. This species is a Neotropical migrant that breeds in California. This species occurs and nests in willow-dominated, riparian woodland or scrub habitats in the vicinity of water or in dry river bottoms. Least Bell's vireo is federally and State-listed as an Endangered species. Their nests are protected by the MBTA and Fish and Game Codes pertaining to native nesting avian species. Suitable habitat for this species exists within the riparian drainage along the southern project boundary. There are 13 recent and three historical records within 5 miles of the project site and 29 recent and three historical records between 5 and 10 miles from the project site.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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South Environmental conducted focused surveys for the least Bell’s vireo between May 1 and July 24, 2024, on the adjacent Highland Grove IV project site. Because the species was detected in riparian habitat similar to that found on the current project site, least Bell’s vireo is assumed to occupy riparian habitat in Drainage A along the southern project site boundary. (FCS, 2024b, p.54)

Stephens’ Kangaroo Rat — The Stephens’ kangaroo rat occurs primarily in annual and perennial grasslands but also occurs in coastal scrub and sagebrush with sparse canopy cover. This species prefers buckwheat, chamise, brome grass, and filaree. It will also burrow into firm soil. The Stephen’s kangaroo rat is listed as Threatened under both CESA and the Endangered Species Act. It is covered under the Stephen’s Kangaroo Rat HCP. Suitable habitat for this species exists within the wild oats and annual brome grassland on the project site. There is one recent and 25 historical records within 5 miles of the project site, and there are 45 historical records between 5 and 10 miles from the project site. This species was not observed during any surveys conducted for the proposed project but has a moderate potential to occur on-site. (FCS, 2024b, p.54)

Western Yellow Bat — Western yellow bat occurs in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats and is a year-round resident in California. This species roosts in the skirts of dead fronds in both native and non-native palm trees. The western yellow bat is designated as a California Species of Special Concern. Palm trees present on the project site may provide potential roosting habitat, and this species may forage in the wild oats and annual brome grassland. There is one historical record within 5 miles and there are two historical records between 5 and 10 miles from the project site (Exhibit 9).55 GLA conducted focused, acoustic surveys for bats on the adjacent Highland Grove III project site and detected western yellow bats in habitat conditions similar to those on the current project site. (FCS, 2024b, p.55)

San Diego Black-tailed Jackrabbit — San Diego black-tailed jackrabbit is a lagomorph in the family Leporidae. This species occurs primarily in arid regions with short grass including open grasslands, agricultural fields, and sparse coastal scrub. It nests under bushes or shrubs that have shallow depressions. The San Diego black-tailed jackrabbit is covered under the MSHCP. Suitable habitat for this species is present on and adjacent to the project site in the wild oats and annual brome grassland. The wild oats and annual brome grassland on the project site provide suitable habitat for this species. There are two historical records within 5 miles and there are three historical records between 5 and 10 miles from the project site. This species was not observed during any surveys conducted for the proposed project but has a moderate potential to occur on-site. (FCS, 2024b, p.55)

Pocketed Free-tailed Bat — Pocketed free-tailed bats are believed to be non-migratory and are generally distributed within a wide range of habitats from sea level to approximately 7,300 feet above mean sea level, including pinon-juniper woodlands, desert scrub, palm oasis, desert wash, and desert riparian. This species forages primarily on large moths but will also take small moths, beetles, and a variety of other insects. Suitable foraging habitat is present within the wild oats and annual grassland community and riparian areas on the project site. There are two historical records within 5 miles of the project site and two historical records 5 and 10 miles from the project site (Exhibit 9). GLA conducted focused, acoustic surveys for bats on the adjacent Highland Grove III project site and detected pocketed free-tailed bats in habitat conditions similar to those on the current project site. (FCS, 2024b, p.55)

Crotch’s Bumble Bee –

The Crotch’s bumble bee is a species of bee in the family Apidae. This species occurs primarily in California, including coastal habitats, the western Mojave Desert, the San Joaquin Valley, and adjacent foothills through most of southwestern California. It inhabits arid grasslands and shrublands, and its food sources including milkweed, pincushion, lupine, clover, phacelia, sage, clarkia, poppy, and buckwheat. Threats to this species include climate change, pesticide use, competition from non-native bees, reduced genetic diversity, and habitat loss and degradation, including agricultural intensification in California’s northern Central Valley and rapid urbanization in the southern Central Valley. In June of 2019, the California Fish and Game Commission (Commission) voted 3-1 that listing the Crotch’s bumble bee may be warranted under CESA; however, a Superior Court ruling in January 2021 blocked the listing. The listing decision by the Commission was ultimately upheld and the species’ candidacy was reinstated under CESA on September 30, 2022. The Crotch’s bumble bee is not covered under the MSHCP. A Crotch’s bumble bee habitat assessment was conducted by FCS and the assessment determined that marginally suitable habitat for this species is present on and adjacent to the project site in the wild oats and annual brome grassland and flowering plants. There is one historical record within 5 miles and one recent and four historical records between 5 and 10 miles from the project site (Exhibit 9).⁵⁸ This species was not observed during the focused surveys; therefore, this species is considered absent from the project site. (FCS, 2024b, p.55-56)

Nesting Birds

The project site and adjacent areas contain vegetation and other potential nesting platforms that could provide suitable nesting habitat for bird species protected under the MBTA and the Fish and Game Code, including loggerhead shrike, yellow warbler, least Bell’s vireo, Cooper’s hawk, burrowing owl, white-tailed kite, and other native avian species. Construction activities could disturb birds that breed and nest in shrubs or on the ground surface on and adjacent to the project site. Potential impacts on special-status and migratory birds that could result from the construction and operation of the proposed project include destruction of eggs or occupied nests, mortality of young, and abandonment of nests with eggs or young birds prior to fledging. (FCS, 2024b, p. 56)

Roosting Bats

The project site offers potentially viable roosting habitat (tree cavities) for special-status bat species, including the pocketed free-tailed bat and the western yellow bat. Bats could potentially forage in the wild oats and annual brome grassland. Roosts are used during the daytime to seek refuge; at night between foraging excursions to rest, digest prey, seek refuge from predators or poor weather conditions, or for social purposes; and in winter for hibernation. Adult females and their young use particularly secure roosts as maternity roosts. The number of bats occupying a given roost can vary from a solitary individual to a large colony, depending on the species. Roosting sites are very sensitive to human disturbance, especially when bats are hibernating or rearing young. At dusk, bats leave their roosts to forage for insects near ponds or riparian habitats. Ecotone areas (areas of transition between habitats) are also used as foraging areas. The project site and adjacent riparian area has foraging potential for bat species. No bats were observed during the general biological field survey conducted by FCS; however, GLA detected pocketed free-tailed bats and western yellow bats during focused acoustic surveys of the nearby Highland Grove III project site. (FCS, 2024b, p. 56)

The project site offers potentially viable roosting habitat (tree cavities) for special-status bat species, including the pocketed free-tailed bat and the western yellow bat. Roosting sites are very sensitive to

human disturbance, especially when bats are hibernating or rearing young. The project site and adjacent riparian area has foraging potential for bat species. No bats were observed during the general biological field survey conducted by FCS; however, GLA detected pocketed free-tailed bats and western yellow bats during focused acoustic surveys of the nearby Highland Grove III project site. (FCS, 2024b, p. 51-p.52)

The proposed project would achieve MSHCP consistency with respect to potential impacts on habitats of any endangered or threatened species with the implementation of **Mitigation Measures BIO-1a and BIO-2b and Mitigation Measures BIO-2a through Bio-2c.**

- d) Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Most of the project site consists of non-native grassland and developed lands and is surrounded by urbanized areas and roads to the south and west and undeveloped lands to the east. The project site does not serve as a wildlife movement corridor. The aquatic features on and adjacent to the project site may provide movement opportunities for common wildlife species, but the construction and operation of the proposed project would not impact the corridor or influence wildlife movement within it. Because the project site does not function as a wildlife corridor, the proposed project would not impact wildlife corridor resources and mitigation is not required.

The project site and adjacent lands support vegetation communities, land cover types, trees, and other habitat features that provide nesting habitat for avian species covered under the MBTA and Fish and Game Code 3503 and 3503.5, including common, native species and special-status species that may occur on-site, including Cooper’s hawk, burrowing owl, white-tailed kite, loggerhead shrike, yellow warbler, and least Bell’s vireo. Construction of the proposed project could potentially impact nesting birds if ground-disturbing or vegetation-removing construction activities are initiated or conducted during the avian breeding season (February 1 through September 15).To address potential impacts to nesting birds, the proposed project would implement **Mitigation Measures BIO-4a and BIO-4b** to reduce potential impacts to less than significant.

The project site contains trees that could provide suitable bat roosting habitat, including for special-status bats such as the pocketed free-tailed bat and western yellow bat as well as common species. Potential direct and indirect impacts could occur to roosting bats due to removal of potential roosting habitat during project construction. These activities could potentially subject bats to risk of death or injury, and they are likely to avoid using the area until such construction activities have dissipated or ceased. Relocation, in turn, could cause hunger or stress among individual bats by displacing them into adjacent territories belonging to other individuals. To address potential impacts to roosting bats, the proposed project would implement **Mitigation Measures BIO-5a and BIO-5b** to reduce potential impacts to less than significant.

- e) There is no USACE jurisdiction within the project site. Flows associated with Drainage A do not contain a continuous surface connection with a navigable water of the United States. Flows associated with Drainage A leave the project site and terminate approximately 2.5 miles northwest within a concrete pipe culvert at an agricultural field south of the intersection of Cleveland Avenue and Harrison Street. Subsurface flow continues in the storm drain indefinitely and does not appear to reemerge as surface flow. Therefore, Drainage A does not contain a continuous surface connection to a navigable water of the United States and would likely not be classified as waters of the United States under the jurisdiction of

the USACE. Note that a final determination can only be made by the USACE following verification. (FCS, 2024, p. 18)

RWQCB jurisdiction is limited to Drainage A and totals approximately 0.61 acre (0.26 acre of which consists of state wetlands). A total of approximately 1,914 feet of intermittent stream are present. Waters of the State are defined as “any surface water or groundwater, including saline waters, within the boundaries of the State” (Water Code § 13050(e)) and are under the jurisdiction of the RWQCB. Since Drainage A is not subject to USACE jurisdiction pursuant to Section 404 of the CWA, this feature is also not subject to the RWQCB jurisdiction pursuant to Section 401 of the CWA. However, since Drainage A conveys surface flow with the potential to support beneficial uses and includes State wetlands, Drainage A is considered to be waters of the State that would be regulated by the Regional Board pursuant to the Porter-Cologne Act and would require a Waste Discharge Requirement if there are any impacts to Drainage A. (FCS, 2024, p. 19)

CDFW jurisdiction is limited to Drainage A and totals approximately 1.67 acres (0.26 acre of which consists of riparian and wetland habitats). A total of approximately 1,914 linear feet of intermittent stream are present. (FCS, 2024b, p. 44)

Drainage A exhibited defined stream flow indicators as evidenced by changes in the character of the soil, destruction of terrestrial vegetation, the presence of litter and debris, and incised channel bank. Because of the presence of drainage beds and banks and the presence of riparian and wetland habitat, it is expected that the CDFW will assert regulatory oversight over potential impacts on Drainage A pursuant to California Fish and Game Code Section 1602, et. Seq. (Streambed Alteration Program) and would require a Notification of Streambed Alteration and subsequent Streambed Alteration Agreement for any work that could adversely affect the Drainage A and associated riparian/wetland vegetation. (FCS, 2024, p. 19)

MSHCP Riparian/Riverine resources on the project site total approximately 1.67 acres (1.41 acres of which consist of MSHCP Riparian habitat) and are identical to that of CDFW jurisdiction. No vernal pools were observed during field surveys. (FCS, 2024b, p. 44)

The project would avoid drainage “A” and the associated riparian/wetland habitats, therefore there would be no impacts on state or protected wetlands or jurisdictional features. Therefore, **Mitigation Measures BIO-3a, BIO-3b, and BIO-3c** will be implemented during construction to reduce potential impacts to state protected wetland and jurisdictional features to a less than significant threshold.

- f) The project site includes 0.61 acres of potential waters of the State and 1.67 acres of aquatic features and associated riparian habitat regulated pursuant to the CDFW Streambed Alteration Program. Project development would result in no impacts to potential waters of the State regulated by the RWQCB under Section 13260 of the California Water Code; and no impacts to aquatic features and associated riparian habitat, regulated pursuant to the CDFW Streambed Program.

No wetlands or vernal pools were observed on the project site. Because there are no wetlands or vernal pools on or adjacent to the project site, the proposed project would have no impact related to effects on State or federally protected wetlands or vernal pools and no mitigation is required.

To address impacts to potential waters of the State, aquatic features, and associated riparian habitat, the proposed project would implement **Mitigation Measures BIO-3a, BIO-3b, and BIO-3c** to reduce potential impacts to less than significant.

- g) Aside from the MSHCP, which is addressed under the analysis of Threshold(a) above, the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). Ordinance Number 559 stipulates that no person shall remove any living native tree on any parcel or property greater than one-half acre in size located in an area above 5,000 feet in elevation and within the unincorporated area of the County of Riverside without first obtaining a permit to do so. Native trees within this ordinance are defined as any woody plant which is indigenous to Riverside County, and all smog-resistant species introduced as part of a reforestation program, which have one well-defined stem that at maturity normally attains a height of at least 15 feet and which is not less than 6 inches in diameter measured 4 feet above the ground. There are no oak trees or vegetation communities containing oak trees within the project site. Additionally, Riverside County Ordinance No. 559 applies to properties located above 5,000 feet AMSL in elevation, while the maximum elevation at the project site is approximately 1419 feet AMSL; therefore, Riverside County Ordinance No. 559 is not applicable to the proposed project.

The Ordinance defines native trees as plants which, at maturity, normally attain a height of at least 30 feet and are not less than 12 inches in diameter when measured 4.5 feet above the ground and includes woody plants indigenous to Riverside County and all smog-resistant species introduced as part of a reforestation program. The Ordinance requires that no person shall remove any living native tree on any parcel or property greater than 0.5 acre in size located in an area above 5,000 feet in elevation and within the unincorporated area of the County without first obtaining a permit to do so, unless exempted by the provisions of Section 12.24.040. No protected trees are proposed for removal by the proposed project.

There are no oak woodlands that would be protected under the California Oak Woodlands Conservation Act on the project site, nor trees or woodland communities that would be protected under County Ordinance 559 or County Code Chapter 12.24, and mitigation is not proposed. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Therefore, no impact would occur.

Mitigation: The following **BIO Mitigation Measures** are required:

BIO-1a

The project applicant shall retain a qualified Biologist to perform a pre-construction burrowing owl survey to determine whether burrowing owls are present on-site within 30 days prior to construction activities, according to the California Department of Fish and Wildlife (CDFW) guidelines and Multiple Species Habitat Conservation Plan (MSHCP) protocol. If construction is delayed or suspended for more than 30 days after the survey, the area shall be resurveyed. The pre-construction survey shall be completed on the project site and the areas within 500 feet from the project boundary (where possible and appropriate based on habitat). All occupied burrows shall be mapped in an aerial photo. The applicant shall provide a burrowing owl survey report and mapping to the County at least 15 days prior to the expected start of

any project-related ground disturbance activities or restart of activities. If the survey is positive for burrowing owls, the project applicant shall implement MM BIO-3b. If no burrowing owls are detected during the pre-construction survey, no further action is necessary.

BIO-1b

If the pre-construction survey is positive for burrowing owls, the project proponent shall retain a qualified Biologist to develop and implement a Burrowing Owl Mitigation Plan. The Burrowing Owl Mitigation Plan shall contain the following elements (as outlined in the California Department of Fish and Wildlife [CDFW] 2012 guidelines) at a minimum:

- Avoidance of burrowing owls during construction, including establishment of a 160-foot radius around occupied burrows during the nonbreeding season (September 1 through January 31) or a 200 to 500 meter (656 to 1,640 feet) radius around occupied burrows during the breeding season (February 1 through August 31), within which construction activities may not occur until a qualified Biologist has determined that (1) nonbreeding season owls have dispersed from the area; or (2) breeding season owls have fledged their juveniles from the occupied burrows and the juveniles are foraging independently and are capable of independent survival or have dispersed from the area.
- A plan for implementing a passive relocation program for nonbreeding owls, should it be needed. The passive relocation techniques should be consistent with CDFW guidelines, including installation of artificial burrows at an off-site location and use of one-way exclusion doors to ensure owls have left the burrow(s).

BIO-2a

If ground-disturbing or vegetation-removing construction activities are initiated or conducted during the least Bell's vireo breeding season (March 15 through September 15), a qualified Biologist shall establish and demarcate a 300-foot avoidance buffer (e.g., using fencing, pin flags, and/or yellow caution tape) around all suitable riparian habitat within Drainage A and designated it as an Environmentally Sensitive Area (ESA). No construction activities or construction foot traffic is allowed to occur within the ESA avoidance buffer(s). Construction personnel shall be instructed not to enter the ESAs and the Biologist(s) shall ensure that the ESA boundaries are maintained. The ESA buffer zone shall be maintained until the end of the least Bell's vireo nesting season.

BIO-2b

If ground-disturbing or vegetation-removing project activities are initiated within 300 feet of riparian habitat during the breeding season for least Bell's vireo (March 15 through September 15), the project applicant shall implement a pre-construction survey for the species. The pre-construction survey for least Bell's vireo shall be implemented by a qualified Biologist within any affected riparian habitat on the project site, as well as in riparian habitat (on-site or off-site) within 300 feet of the project activities. The survey shall be implemented within 7 days of the initiation of project activities. If more than 7 days passes following implementation of the survey, an additional pre-construction survey shall be implemented. If the pre-construction survey is negative for least Bell's vireo, no further action is necessary. If nesting least Bell's vireo are detected within 300 feet of planned project activities, the project applicant shall implement MM BIO-2c.

BIO-2c

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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If ground-disturbing or vegetation-removing construction activities are planned within the least Bell's vireo breeding season (March 15 through September 15), and conducted within the 300-foot avoidance buffer then a qualified acoustician shall be retained to determine the ambient noise levels and construction related noise levels at the edge of suitable habitat. Noise levels at the edge of the suitable habitat shall not exceed an hourly average of 60 decibels (dBA), or an hourly average increase of 5 dBA if the ambient noise level is already 60 dBA. If construction-related noise levels exceed the threshold described above, construction activities shall cease until sound attenuation devices (sound walls, sound reducing curtains, etc.) are installed. If additional sound attenuation devices do not decrease construction-related noise levels below the thresholds described above, construction activities shall cease until CDFW and/or USFWS shall be contacted to discuss alternative methods.

BIO-3a

Prior to construction, the limits of the riverine feature and riparian habitat shall be delineated with fencing or flagging (orange plastic snow fence, orange silt fencing, or stakes and flagging) and designated as an Environmentally Sensitive Area (ESA). No construction activities and/or access would be permitted within the ESA designated areas. If work occurs with the ESA areas, all work shall cease until the issue has been resolved through the appropriate regulatory agencies and the County. ESA fencing and/or flagging shall be maintained in good repair by the Contractor and shall be removed upon completion of project construction.

BIO-3b

The proposed project would comply with all applicable water quality regulations, including obtaining and complying with those conditions established in Waste Discharge Requirements (WDRs) and an NPDES permit. Standard BMPs, which may include but are not limited to silt fencing, gravel berm, and fiber rolls, shall be installed to prevent any sediment and stormwater flows from entering the riverine feature. A project-specific Water Quality Management Plan and/or a Storm Water Pollution Prevention Plan (SWPPP) shall be implemented for the proposed project and shall detail project-specific BMPs.

BIO-3c

The following Best Management Practices (BMPs) shall be implemented during the construction phase to reduce indirect impacts to aquatic resources:

- Time construction activities to avoid impact to sensitive biological resources and protect water quality. To the extent possible, construction activities shall occur during the dry season, between April 15 and October 15, or as otherwise determined by permitting agencies and in compliance with Section 401 of the Federal Clean Water Act.
- Locate equipment maintenance, refueling, and staging areas at least 100 feet from creeks or other aquatic habitat. Conduct refueling behind a containment barrier that prevents spilled or leaked fuel from entering the aquatic habitat. All equipment servicing shall be conducted within designated areas with appropriate setbacks from the aquatic features. All motorized equipment used during construction shall be inspected for oil, fuel, and coolant leaks prior to initiating work.
- Implement a SWPPP as part of the proposed project, to ensure that sediment and contaminants from construction areas do not enter creek channels or other aquatic habitat.
- Use only native plant species for reseeding and re-planting to minimize the expansion of exotic plants. Mitigation plantings should be implemented in accordance with applicable regulatory agency permit requirements and consistently with MSHCP requirements.

BIO-4a

If ground-disturbing or vegetation-removing construction activities or tree removal are proposed at any time of the year, a qualified Biologist shall conduct pre-construction surveys for special-status birds and other migratory birds within the construction area, including a 300-foot survey buffer, no more than 3 days prior to the start of ground-disturbing activities in the construction area.

BIO-4b

If an active avian nest is located during the pre-construction survey, a qualified Biologist shall establish and demarcate a 200-foot (for Passerine birds) or 300-foot (for raptors) avoidance buffer using Environmentally Sensitive Area (ESA) fencing, pin flags, and/or yellow caution tape. No construction activities or construction foot traffic is allowed to occur within the avoidance buffer(s). Construction personnel shall be instructed not to enter the ESAs, and the Biologist(s) shall ensure that ESA boundaries are maintained. The ESA buffer zone shall be maintained around the active nest site(s) until the young have fledged and are foraging independently.

BIO-5a

A qualified Biologist with relevant roosting bat experience shall conduct a survey of the project site to determine whether active bat roosts are located on or directly adjacent to the site. The survey shall be conducted no less than 7 days and no more than 14 days prior to beginning ground disturbance and/or construction in connection with each individual development phase. The survey shall be conducted during an appropriate time of day to maximize detectability of roosting bats. Survey methodology may include visual surveys of bats (e.g., observation of bats during foraging period), inspection for suitable habitat, bat sign (e.g., guano), or use of ultrasonic detectors (Anabat, etc.).

BIO-5b

If the Biologist determines or presumes bat roosts are present, the Biologist shall exclude the bats from suitable cavity spaces by installing one-way exclusion devices. After the bats vacate the space, the Biologist shall close off the space to prevent recolonization. Bat exclusion and eviction shall only occur outside of the bat maternity season (October 2 through April 31). No exclusion or eviction shall occur during the maternity season (May 1 through September 30) for western yellow bat, pocketed free-tailed bat, or other sensitive bat species. Construction activities in connection with the subject individual development phase shall only commence after the Biologist verifies 7 to 10 days later that the exclusion methods have successfully prevented bats from returning. If bats are present outside the exclusion and eviction period (October 2 through April 31), then the project applicant shall coordinate with California Department of Fish and Wildlife (CDFW) to establish an appropriate buffer.

BIO-6a

To maintain consistency with Multiple Species Habitat Conservation Plan (MSHCP) requirements during construction, the applicant shall implement the following Construction Minimization Measures, per Section 7.5.3 of the MSHCP:

- Plans for water pollution and erosion control will be prepared. The plans shall describe sediment and hazardous materials control, dewatering or diversion structures, fueling and equipment management practices, and use of plant material for erosion control.
- Avoid work in riparian areas during most active breeding season; typically designated as March 1 to June 30 by the California Department of Fish and Wildlife (CDFW)/MSHCP Guidelines. Disturbance is restricted to a minimum of 300 feet away from any active nest.

- If vegetation removal must occur during this avoidance period, then a nest survey by a qualified Biologist is required. The nest survey shall be conducted for five consecutive days and no more than 3 days prior to clearing. If an active nest is observed, then the nest location shall be fenced off surrounding a minimum 300-foot (500 feet for raptors) radius buffer zone. The buffer zone shall not be disturbed until the nest is inactive.
- Sediment and erosion control measures will be implemented until such time soils are determined to be successfully stabilized.
- Short-term stream diversions, if needed, shall be accomplished by use of sandbags or other methods that shall result in minimal instream impacts. Short-term diversions shall consider effects on wildlife.
- Silt fencing or other sediment trapping materials shall be installed at the downstream end of construction activities to minimize the transport of sediments off-site.
- Settling ponds where sediment is collected shall be cleaned in a manner that prevents sediment from re-entering the stream or damaging/disturbing adjacent areas. Sediment from settling ponds will be removed to a location where sediment cannot re-enter the stream or surrounding drainage area. Care shall be exercised during removal of silt fencing to minimize release of debris or sediment into streams.
- No erodible materials shall be deposited into water courses. Brush, loose soils, or other debris material shall not be stockpiled within stream channels or on adjacent banks.
- The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall occur on pre-existing access routes to the greatest extent possible.
- Equipment storage, fueling, and staging areas shall be sited on non-sensitive upland habitat types with minimal risk of direct discharge into riparian areas or other sensitive habitat types.

BIO-6b

To maintain consistency with Multiple Species Habitat Conservation Plan (MSHCP) requirements, the project applicant shall implement the following Best Management Practices (BMPs) during the construction phase of the proposed project:

1. A condition shall be placed on grading permits requiring a qualified Biologist to conduct Worker Environmental Awareness Program (WEAP) training for project personnel prior to grading. This training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act and the MSHCP, the need to adhere to the provisions of the Endangered Species Act and the MSHCP, the penalties associated with violating the provisions of the Endangered Species Act, the general measures that are being implemented to conserve the species of concern as they relate to the proposed project, and the access routes to and project site boundaries within which the proposed project activities must be accomplished.
2. The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible.
3. Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage into riparian areas or other sensitive habitats. These designated areas shall be located in such a manner as to prevent any runoff from entering sensitive habitat.
4. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project-related spills of hazardous materials shall be reported to appropriate entities including but not limited to the City, United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and/or Regional Water Quality Control Board

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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(RWQCB), as applicable, and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.

5. Erodible fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.
6. The qualified project Biologist shall monitor construction activities for the duration of the proposed project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the project footprint.
7. The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species.
8. Exotic species that prey upon or displace target species of concern should be permanently removed from the site to the extent feasible.
9. To avoid attracting predators of the species of concern, the project site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site(s).
10. Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the proposed project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screens. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.
11. The City shall have the right to access and inspect the project site to determine its compliance with project approval conditions, including these BMPs.

BIO-7a

If initial vegetation or ground disturbance or tree trimming/encroachment/removal occurs during the bee's activity period (February through October), a Qualified Biologist shall conduct a pre-construction survey of disturbance areas for bee colonies with seven (7) days prior to the start of work. The pre-construction survey shall be conducted during the appropriate season utilizing an appropriate survey method based on the species' biology and using the protocol identified by the CDFW's publication, "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species" or any other applicable method published at the time of the survey. If a colony is present, a 100-foot avoidance buffer shall be established. Survey results, including results from focused Crotch's bumble bee surveys conducted in 2023, shall be provided to the County of Riverside Environmental Programs Department and CDFW.

BIO-7b

If a survey finds that a Crotch's bumble bee colony is present within the Project's Survey Area, the Qualified Biologist shall consult with CDFW. If the Project will impact Crotch's bumble bee, either ground disturbance shall be delayed until the bee's activity has ceased and there is no evidence of any active colonies, or an incidental take permit (ITP) shall be obtained from CDFW and other mitigation shall be implemented as required by CDFW

Monitoring:

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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A qualified biologist will be retained under contract and will conduct the pre-construction surveys and any ongoing monitoring and reporting during construction as identified within the mitigation measures and/or Habitat Mitigation Monitoring Plan (HMMP).

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): Riverside County Information Technology – Map My County (RCIT, 2023); Riverside County General Plan EIR No. 441, Figure 4.7.2 (Riverside County 2020b); Phase I Environmental Site Assessment Update Report (GeoScience, 2024); Cultural Resources Assessment Update for the Greentree Ranch (Highland Grove 5 Segment) Project (BFSA, 2024a)

Findings of Fact:

- a) Historic aerial photographs indicate that the property has been partially dry farmed since the 1940s. By 1959, a citrus orchard had been planted across much of the property. The orchard appears to have been removed from the property between 2002 and 2005. (BFSA, 2024a, p. 4.0-7) By 2006, the current south adjacent residential and agricultural properties were developed. Grading activities continue until 2020 when residential structures are depicted to the north. (GeoScience, 2024, p. 7)

Previous work by Smith and Stropes (2017) and Smith et al. (2018) indicated that the entire property has been previously disturbed, disked, or graded in the past, and dirt roads intersect various portions of the project. As a result of the 2017 and 2018 studies, eight prehistoric and three historic sites were discovered within the larger study area, which includes sites P-33-026653, P-33-026655, P-33-026656, and P-33-026657. BFSA conducted Phase II testing at the four sites from January 25 through February 3, 2017, to identify any subsurface artifact concentrations and determine site boundaries. Shovel test pit (STP) excavations were undertaken at each of the identified cultural resources; however, no cultural materials were recovered from the subsurface tests at any of the sites. Surface examinations at all sites resulted in the recovery of historic artifacts from sites P-33-026653 and P-33-026656 and a small amount of prehistoric debitage from Site P-33-026655. In addition, bedrock milling features at Site P-33-026657 were mapped and recorded. Because the Phase II testing program did not produce any significant surface or subsurface artifact concentrations at any of the sites, sites P-33-026653, P-33-026655, P-33-026656, and P-33-026657 were determined to be not CEQA-significant and not eligible for listing in the California Register of Historical Resources (CRHR).

Sites P-33-026653, P-33-026656, and P-33-026657 were located and found to be in similar condition as when previously studied by BFSA. Prehistoric lithic scatter Site P-33-026655 is no longer extant within the property as the limited number of artifacts previously recorded at the site were collected during the 2017 field investigations.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The Highland Grove Segment 5 Project will result in direct and indirect impacts to recorded cultural resources sites P-33-026653, P-33-026655, P-33-026656, and P-33-026657, which have been evaluated as not CEQA-significant and not eligible to the CRHR. Since none of these sites qualify as Historical Resources, no site-specific mitigation measures are required. However, due to the presence of cultural resources documenting prehistoric and historic use of this property, the potential exists that other unidentified cultural resources may exist within the project that may be exposed during grading. In order to identify any cultural resources uncovered by the development of this project, all earthwork (grading and trenching) shall be monitored by an archaeologist and a Native American representative. (BFSA, 2024a, p. 1.0-2)

- b) As discussed above in Section 8(a), the identified historic sites within the larger study area were determined to not be CEQA-significant and not eligible for listing in the California Register of Historical Resources (CRHR). Since none of these sites qualify as Historical Resources, no site-specific mitigation measures are required. However, due to the presence of cultural resources documenting prehistoric and historic use of this property, the potential exists that other unidentified cultural resources may exist within the project that may be exposed during grading. In order to identify any cultural resources uncovered by the development of this project, all earthwork (grading and trenching) shall be monitored by an archaeologist and a Native American representative. (BFSA, 2024a, p. 1.0-2 – p. 1.0-3)

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
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): Riverside County Information Technology – Map My County (RCIT, 2023); Riverside County General Plan EIR No. 441, Figure 4.7.1 (Riverside County 2020b); CA Senate Bill 18 (SB 18, 2004); CA Assembly Bill 52 (AB 52, 2014); Phase I Environmental Site Assessment Update Report (GeoScience, 2024); Cultural Resources Assessment Update for the Greentree Ranch (Highland Grove 5 Segment) Project (BFSA, 2024a)

Findings of Fact:

- a) Four archaeological sites (P-33-026653, P-33-026655, P-33-026656, and P-33-026657) have previously been recorded within the Highland Grove 5 Segment Project. An updated cultural resources study for the Highland Grove 5 Segment Project resulted in identification of the two historic trash scatters sites (P-33-026653 and P-33-026656) and one prehistoric bedrock milling site (P-33-026657) within the subject property. Prehistoric lithic scatter Site P-33-026655 is no longer extant within the property. All four resources were identified, tested, and evaluated by BFSA in 2017 and 2018. The testing programs for these sites were previously conducted in 2017 and were complete in accordance with County of Riverside report guidelines and CEQA (Section 15064.5) significance evaluation criteria.

Based upon the previous studies and evaluations for resources within the project, and due to the lack of any significant subsurface deposits at any of the sites, all of the identified resources were determined to retain no further research potential beyond recording their locations and attributes, which has been completed. Negative subsurface tests provide the foundation from which to state that the potential for buried cultural deposits at all of the sites is unlikely, and no significantly different information would be gathered from further investigations. None of the resources within the property are CRHR-eligible and no site-specific measures are required. Further, prehistoric Site P-33-026655 is no longer extant within the property and based on the current project design, prehistoric Site P-33-026657 is outside of the grading envelope. However, with the sites being documented cultural resources all attempts to avoid and protect the Native American resources should be implemented, therefore with the implementation of **Mitigation Measure CUL-1** for the avoidance and relocation of these identified resources the impacts would be less than significant. (BFSA, 2024a, p. 5.0-1)

- b) Although no known significant archaeological resource sites would be impacted by the Project, there is a possibility that archaeological resources may be present beneath the site's subsurface, and may be impacted by future ground-disturbing construction activities associated with the Project. Due to the potential to discover significant archaeological resources within the Project boundaries, which could be significantly impacted if not properly identified and treated, a potentially significant impact to subsurface prehistoric resources would occur, however with the implementation of **Mitigation Measure CUL-2** the impacts would be less than significant. (BFSA, 2024a, p. 5.0-1)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- c) The Project site does not contain a cemetery and no known cemeteries are located within the immediate site vicinity. Field surveys conducted on the Project site by BFSa did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site. Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction.

If human remains are unearthed during Project construction, the construction contractor would be required by law to comply with California Health and Safety Code, § 7050.5, "Disturbance of Human Remains." According to § 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner is required to contact the Native American Heritage Commission (NAHC) by telephone within 24 hours. Pursuant to California Public Resources Code § 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.

According to Public Resources Code § 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials. With mandatory compliance to California Health and Safety Code § 7050.5 and Public Resources Code § 5097.98, any potential impacts to human remains, including human remains of Native American descent, would be less than significant and mitigation is not required.

Monitoring during ground-disturbing activities, such as grading or trenching, by a qualified archaeologist is recommended to ensure that if buried features (i.e., human remains, hearths, or cultural deposits) are present, they will be handled in a timely and proper manner. (BFSa, 2024a, p. 5.0-1)

If any human bones are discovered, the county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains. (BFSa, 2024a, p. 5.0-2)

Mitigation: The following **CUL Mitigation Measures** are required:

CUL-1

The developer will avoid and protect in place during construction the bedrock milling feature (P-33-26657) located on the Project Site. Prior to disturbance of the prehistoric lithic scatter (P-33-26655) located on the Project Site during grading, a qualified archaeologist and/or consulting tribe shall examine the project area for any remnants of significance and relocate those items directly adjacent to the bedrock milling feature (P-33-26657) for permanent avoidance and protection in place during construction. The project

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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will also be subject to Mitigation Measures outlined with Section 39 – Tribal Cultural Resources (TCR-01 through TCR-08).

CUL-2

The developer will have prepared a Mitigation Monitoring and Reporting Program (MMRP) to mitigate potential impacts to undiscovered buried cultural resources within the Project area be implemented to the satisfaction of the lead agency. This program shall include, but not be limited to, the following actions:

- Prior to issuance of a grading permit, the applicant shall provide written verification in the form of a letter from the project archaeologist to the lead agency stating that a certified archaeologist has been retained to implement the monitoring program.
- The project applicant shall provide Native American monitoring during grading. The Native American monitor shall work in concert with the archaeological monitor to observe ground disturbances, protect known cultural resources, and search for cultural materials subject to those Mitigation Measure outlined with Section 39 – Tribal Cultural Resources (TCR-01 through TCR-08). Any unanticipated finds will be handled in a timely and culturally appropriate manner.
- The certified archaeologist shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program.
- During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and tribal representative shall be on-site, as determined by the consulting archaeologist, to perform periodic inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The consulting archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.
- Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed.
- In the event that previously unidentified cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. The archaeologist shall contact the lead agency at the time of discovery. The archaeologist, in consultation with the lead agency, shall determine the significance of the discovered resources. The lead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the lead agency before being carried out using professional archaeological methods. If any human bones are discovered, the county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The project archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis.
- All cultural material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.

Monitoring:

A qualified archaeologist and Native American monitor will be retained under contract and will conduct any ongoing monitoring during construction as identified within the mitigation measures and/or Mitigation Monitoring and Reporting Plan (MMRP).

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 General Plan, Riverside County Climate Action Plan (“CAP”) (Riverside County, 2019), Project Application Materials; Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis (Vista Environmental, 2024)

Findings of Fact:

- a) The proposed project would impact energy resources during construction and operation. Energy resources that would be potentially impacted include electricity and petroleum-based fuel supplies and distribution systems. This Project analysis includes a discussion of the potential energy impacts of the proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. (Vista Environmental, 2024, p. 62)

Construction Energy

The construction activities for the proposed project are anticipated to include site preparation and grading of 29 acres of the 36.55-acre project site, building construction of 73 single-family homes, paving of the onsite roads and driveways, sidewalks and hardscapes, and application of architectural coatings. The proposed project would consume energy resources during construction in three (3) general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, as well as delivery and haul truck trips (e.g. hauling of dirt and gravel to and from the project site);
2. Electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power; and,
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.
(Vista Environmental, 2024, p.62-p.63)

Construction-Related Electricity

During construction the proposed project would consume electricity to construct the proposed residential development. Electricity would be supplied to the project site by Southern California Edison and would be obtained from the existing electrical lines in the vicinity of the project site. The use of electricity from existing power lines rather than temporary diesel or gasoline powered generators would minimize impacts on fuel consumption. Electricity consumed during project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities include electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power any necessary lighting

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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during construction, electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Overall, construction activities associated with the proposed project would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies and infrastructure. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary. (Vista Environmental, 2024, p. 63)

Since there are currently power lines in the vicinity of the project site, it is anticipated that only nominal improvements would be required to Southern California Edison Utility distribution lines and equipment with development of the proposed project. Compliance with County’s guidelines and requirements would ensure that the proposed project fulfills its responsibilities relative to infrastructure installation, coordinates any electrical infrastructure removals or relocations, and limits any impacts associated with construction of the project. Construction of the project’s electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity. (Vista Environmental, 2024, p. 63)

Construction-Related Petroleum Fuel Use

Petroleum-based fuel usage represents the highest amount of transportation energy potentially consumed during construction, which would be utilized by both off-road equipment operating on the project site and on-road automobiles transporting workers to and from the project site and on-road trucks transporting equipment and supplies to the project site. (Vista Environmental, 2024, p. 63)

The off-road construction equipment fuel usage was calculated through use of the off-road equipment assumptions and fuel use assumptions, which found that construction of the proposed project would consume 9,496 gallons of gasoline and 88,226 gallons of diesel fuel. This equates to 0.001 percent of the gasoline and 0.05 percent of the diesel consumed annually in Riverside County. As such, the construction-related petroleum use would be nominal, when compared to current county-wide petroleum usage rates. (Vista Environmental, 2024, p. 63-p.64)

Construction activities associated with the proposed project would be required to adhere to all State and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. As such, construction activities for the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Impacts regarding transportation energy would be less than significant. Development of the project would not result in the need to manufacture construction materials or create new building material facilities specifically to supply the proposed project. It is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete, it is reasonable to assume that the production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. (Vista Environmental, 2024, p. 64)

Operational Energy

The on-going operation of the proposed project would require the use of energy resources for multiple purposes including, but not limited to, heating/ventilating/air conditioning (HVAC), refrigeration, lighting, appliances, and electronics. Energy would also be consumed during operations related to water usage, solid waste disposal, landscape equipment and vehicle trips. (Vista Environmental, 2024, p. 64)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Operations-Related Electricity

Operation of the proposed project would result in consumption of electricity at the project site. The proposed project would consume 685,845 kilowatt-hours per year of electricity. This equates to 0.004 percent of the electricity consumed annually in the County of Riverside. As such, the operations-related electricity use would be nominal, when compared to current electricity usage rates in the County. (Vista Environmental, 2024, p. 64)

It should be noted that the proposed project will be required to meet the 2022 Title 24, Part 6 building energy efficiency standards that have been developed to meet the State's goal of zero-net-energy use for new homes. The zero net energy use will be achieved through a variety of measures to make new homes more energy efficient and by also requiring installation of photovoltaic systems of adequate size to generate enough electricity to meet the zero-net-energy use standard. Although, the proposed project would be designed to be net zero energy use, the CalEEMod model found that the proposed project would continue to utilize a nominal amount of power. Therefore, it is anticipated the proposed project will be designed and built to minimize electricity use and that existing and planned electricity capacity and electricity supplies would be sufficient to support the proposed project's electricity demand. This, impacts with regard to electrical supply and infrastructure capacity would be less than significant and no mitigation measures would be required. (Vista Environmental, 2024, p. 64)

Operations-Related Vehicular Petroleum Fuel Usage

Operation of the proposed project would result in increased consumption of petroleum-based fuels related to vehicular travel to and from the project site. The proposed project would consume 108,171 gallons of gasoline fuel per year from vehicle travel. This equates to 0.011 percent of the gasoline consumed in Riverside County annually. As such, the operations-related petroleum use would be nominal, when compared to current petroleum usage rates. (Vista Environmental, 2024, p. 64)

It should be noted that, the proposed project would comply with all Federal, State, and City requirements related to the consumption of transportation energy that includes California Code of Regulations Title 24, Part 10 California Green Building Standards that require all new garages for the proposed homes to install electrical panels of adequate size to support the installation of electric vehicle charging systems. Therefore, it is anticipated the proposed project will be designed and built to minimize transportation energy through the promotion of the use of electric-powered vehicles and it is anticipated that existing and planned capacity and supplies of transportation fuels would be sufficient to support the proposed project's demand. Thus, impacts with regard transportation energy supply and infrastructure capacity would be less than significant and no mitigation measures would be required. (Vista Environmental, 2024, p. 65)

In conclusion, the proposed project would comply with regulatory compliance measures outlined by the State and County related to Air Quality, GHG, Transportation/Circulation, and Water Supply. Additionally, the proposed project would be constructed in accordance with all applicable County Building and Fire Codes. Therefore, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operations. Impacts would be less than significant. (Vista Environmental, 2024, p. 65)

- b) The applicable energy plan for the proposed project is the County of Riverside General Plan 2035, revised July 17, 2018. The proposed project's consistency with the applicable energy-related policies in the General Plan are shown in Table 10.1 below:

Table 10.1 - Proposed Project Compliance with Applicable General Plan Energy Policies

Policy No.	General Plan Policy	Proposed Project Implementation Actions
AQ 4.1	Require the use of all feasible building methods which reduce emissions.	Consistent. The proposed homes will be designed to meet the most current Title 24 Part 6 building standards that require enhanced insulation in order to reduce energy usage and associated emissions.
AQ 4.2	Require the use of all feasible efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units.	Consistent. The proposed homes will be designed to meet the most current Title 24 Part 11 building standards that require all installed appliances to be energy efficient.
AQ 4.3	Require centrally heated facilities to utilize automated time clocks or occupant sensors to control heating where feasible.	Consistent. The proposed homes will be designed to meet the most current Title 24 Part 11 building standards that require the use of occupant sensors.
AQ 4.4	Require residential building construction to comply with energy use guidelines detailed in Part 6 (California Energy Code) and/or Part 11 (California Green Building Standards Code) of Title 24 of the California Code of Regulations.	Consistent. The proposed homes will be designed to meet the most current Title 24 Part 6 and Title 24 Part 11 building standards.
AQ 5.4	Encourage the incorporation of energy-efficient design elements, including appropriate site orientation and the use of shade and windbreak trees to reduce fuel consumption for heating and cooling.	Consistent. The proposed project has been designed to incorporate energy-efficient design elements that include site orientation and the use of shade trees to reduce fuel consumption.
AQ 20.7	Reduce VMT through increased densities in urban centers and encouraging emphasis on mixed use to provide residential, commercial and employment opportunities in closer proximity to each other. Such measures will also support achieving the appropriate jobs-housing balance within the communities. (AI 47, 53, 117, 146)	Consistent. The proposed project consists of development of single-family homes in an area in close proximity to existing commercial and employment areas. As such, the project will support achieving appropriate jobs-housing balance within the community.

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AQ 20.8	Reduce VMT by increasing options for non-vehicular access through urban design principles that promote higher residential densities with easily accessible parks and recreation opportunities nearby. (AI 115, 117, 146)	Consistent. The proposed project will include trails to a proposed City Park that will be within walking distance of the proposed homes as well as installation of sidewalks on onsite roads that will connect to the sidewalks on the offsite roads that will reduce VMT.			
AQ 20.9	Reduce urban sprawl in order to minimize energy costs associated with infrastructure construction and transmission to distant locations, and to maximize protection of open space. (AI 26)	Consistent. The proposed project is an infill development that is bordered by proposed residential uses on two sides. As such the infrastructure in the vicinity of the project site was designed of adequate size to support the proposed project and only minimal offsite improvements to infrastructure will be required as a result of development of the proposed project.			
AQ 20.10	Reduce energy consumption of the new developments (residential, commercial and industrial) through efficient site design that takes into consideration solar orientation and shading, as well as passive solar design (AI 147)	Consistent. The proposed project has been designed to incorporate energy-efficient design elements that include solar orientation and shading.			
AQ 20.11	Increase energy efficiency of the new developments through efficient use of utilities (water, electricity, natural gas) and infrastructure design. Also, increase energy efficiency through use of energy efficient mechanical systems and equipment. (AI 147)	Consistent. The proposed homes will be designed to meet the most current Title 24 Part 6 and Title 24 Part 11 building standards that require the installation of energy efficient lights, appliances and ventilation systems as well as the installation of low-flow fixtures and use of water efficient irrigation systems.			
AQ 20.18	Encourage the installation of solar panels and other energy-efficient improvements and facilitate residential and commercial renewable energy facilities (solar array installations, individual wind energy generators, etc.). (AI 147)	Consistent. The proposed homes will be designed to meet the most current Title 24 Part 6 building standards that require each home to install a solar PV system of adequate size to meet the net zero electricity usage requirements.			

As shown in Table 10.1, the proposed project would be consistent with all applicable energy-related policies from the General Plan. Therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant. (Vista Environmental, 2024, p.65-p.66)

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
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GEOLOGY AND SOILS Would the project directly or indirectly:

11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones

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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 Figure S-1 "Earthquake Fault Study Zones" (Riverside County, 2020a), Riverside County Information Technology – Map My County (RCIT, 2023); Riverside County General Plan EIR No. 441, Figure 4.10.1 (Riverside County 2020b); Geotechnical Due Diligence Evaluation and Review of Proposed Residential Development, Tentative Tract Map 39011, North of El Sobrante Road, County of Riverside, California (LGC, 2024)

Findings of Fact:

a) The subject site is not located within a State of California Earthquake Fault Zone (Alquist-Priolo) and no faults were identified on the site during our site evaluation. The possibility of damage due to ground rupture is considered low since no active faults are known to cross the site. The closest known active faults to the subject site are the San Jacinto Fault Zone located about 14 miles east of the site, and the Elsinore Fault Zone located about 7 miles west of the site. (LGC, 2024, p. 10)

Secondary effects of seismic shaking resulting from large earthquakes on the major faults in the Southern California region, which may affect the site, include ground lurching and shallow ground rupture, soil liquefaction, and dynamic settlement. These secondary effects of seismic shaking are a possibility throughout the Southern California region and are dependent on the distance between the site and causative fault and the onsite geology. (LGC, 2024, p. 10) A discussion of these secondary effects is provided in Section 12.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

12. Liquefaction Potential Zone

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

Source(s): Riverside County General Plan Figure S-3 "Generalized Liquefaction" (Riverside County, 2020a); Riverside County General Plan EIR No. 441, Figure 4.10.3 (Riverside County 2020b); Updated Preliminary Geotechnical Report (AGS, 2018); Geotechnical Due Diligence Evaluation and Review of Proposed Residential Development, Tentative Tract Map 39011, North of El Sobrante Road, County of Riverside, California (LGC, 2024)

Findings of Fact:

- a) Liquefaction is the phenomenon where seismic agitation of loose, saturated sands and silty sands can result in a buildup of pore pressures that, if sufficient to overcome overburden stresses, can produce a temporary quick condition known as liquefaction. Localized, loose lenses/layers of sandy soils may be subject to liquefaction when a large, prolonged, seismic event affects a site. (AGS, 2018, p. 12)

In general, the more recent a sediment has been deposited, the more likely it is to be susceptible to liquefaction. Further, liquefaction potential is greatest in loose, poorly graded sands and silty sands with mean grain size in the range of 0.1 to 0.2 mm. Other factors that must be considered are groundwater, confining stresses, relative density, intensity, and duration of ground shaking. It is generally held that soils possessing a clay content (particle size < 0.005mm) greater than fifteen (15) to twenty (20) percent may be considered non-liquefiable. (AGS, 2018, p. 12)

Due to the dense nature of the granitic rock on site, the relatively thin veneer of granular soils, and the lack of shallow groundwater beneath the site, the Project site is not considered to be within a zone susceptible to liquefaction. However, there is a remote potential that future structures on site could be subject to liquefaction hazards in the event that future implementing developments do not comply with the recommendations of the Project's geotechnical study. Accordingly, impacts due to seismic-related ground failure, including liquefaction, would be potentially significant however with the implementation of **Mitigation Measure GEO-1**, the recommendations outlined within the Projects preliminary geotechnical evaluation, the impacts would be reduced to less than significant. (AGS, 2018, p. 12)

Mitigation: The following **GEO Mitigation Measures** are required:

GEO-1

Prior to issuance of building permits, the Director of the Riverside County Building and Safety Division (or his/her designee) shall verify that all of the recommendations given in the Project's May 25, 2018 "Updated Preliminary Geotechnical Investigation" by AGS and the September 25, 2024 "Geotechnical Due Diligence Evaluation and Review of Proposed Residential Development, Tentative Tract Map 39011, North of El Sobrante Road, County of Riverside, California" by LGC, are incorporated into the construction and grading plans.

Monitoring:

A qualified Geotechnical Engineer and/or Geologist will be retained under contract and will conduct any ongoing observations, monitoring, and reporting during grading operations as identified within the recommendations given in the Project's May 25, 2018 "Updated Preliminary Geotechnical Investigation" by AGS and the September 25, 2024 "Geotechnical Due Diligence Evaluation and Review of Proposed Residential Development, Tentative Tract Map 39011, North of El Sobrante Road, County of Riverside, California" by LGC, or additional recommendations based on field conditions observed during grading operations.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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13. Ground-shaking Zone

- a) Be subject to strong seismic ground shaking?

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Source(s): Riverside County General Plan Figure S-4 “Earthquake-Induced Slope Instability Map,” and Figures S-13 through S-21 (Riverside County, 2020a); Riverside County General Plan EIR No. 441, Figure 4.10.2 (Riverside County 2020b); Updated Preliminary Geotechnical Report (AGS, 2018); Geotechnical Due Diligence Evaluation and Review of Proposed Residential Development, Tentative Tract Map 39011, North of El Sobrante Road, County of Riverside, California (LGC, 2024)

Findings of Fact:

- a) The nearest fault zone, Elsinore Fault Zone, occurs approximately 5.5 miles southwest from the Project site. However, the Project site is located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. The risk is not considered substantially different than that of other similar properties in the southern California area. The Project would be required to construct all proposed structures in accordance with the CBC (Title 24) and the Riverside County Building Code. The CBC and Riverside County Building Code have been designed to preclude significant adverse effects associated with strong seismic ground shaking.

The proposed Project has the potential to expose people or structures to substantial adverse effects, including, loss, injury, or death, as a result of strong seismic ground shaking. This is evaluated as a significant impact, however with the implementation of **Mitigation Measure GEO-1**, the recommendations outlined within the Projects preliminary geotechnical evaluation, the impacts would be reduced to less than significant. (AGS, 2018, pp. 9-10)

Mitigation: See **Mitigation Measure GEO-1** outlined within Section 12, “Liquefaction Potential Zone”.

Monitoring: See monitoring outlined within Section 12, “Liquefaction Potential Zone”.

14. Landslide Risk

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

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Source(s): On-site Inspection, Riverside County General Plan Figure S-5 “Regions Underlain by Steep Slope”; (Riverside County, 2020a); Riverside County General Plan EIR No. 441, Figure 4.10.2 (Riverside County 2020b); Updated Preliminary Geotechnical Report (AGS, 2018); Geotechnical Due Diligence Evaluation and Review of Proposed Residential Development, Tentative Tract Map 39011, North of El Sobrante Road, County of Riverside, California (LGC, 2024)

Findings of Fact:

a) On- or Off-Site Landslide

Under existing conditions, the Project site contains gently sloping topography, and does not contain any unique features or prominent hillsides that could become unstable and subject the Project site or surrounding areas to a landslide. Due to topography and hard and massive nature of the underlying granitic bedrock at the Project site, the potential of seismically-induced land sliding under existing conditions is considered to be “very low.” As such, impacts due to landslides would be less than significant. (AGS, 2018, p. 12)

Lateral Spreading

Liquefaction-induced lateral spreading is defined as the finite, lateral displacement of gently sloping ground as a result of pore pressure build-up or liquefaction in a shallow underlying deposit during an earthquake. Due to the lack of shallow ground water, the potential for lateral spreading is identified by AGS as being “remote.” However, the findings made by AGS with respect to lateral spreading assumes that the recommendations of the Project’s geotechnical study are implemented. Impacts due to lateral spreading could occur if the recommendations of the Project’s geotechnical study are not adhered to. Accordingly, impacts due to lateral spreading could be potentially significant, however with the implementation of **Mitigation Measure GEO-1**, the recommendations outlined within the Projects preliminary geotechnical evaluation, the impacts would be reduced to less than significant. (AGS, 2018, p. 12)

Collapse

Although the Project site conditions and the lack of near-surface groundwater would result in minimal impacts from potential hydro-collapse, there is nonetheless a remote potential for such hazards to impact future development on site in the event that the recommendations of the Project’s geotechnical study are not incorporated into future construction plans for the site. Thus, impacts due to hydro-collapse could be potentially significant, however with the implementation of **Mitigation Measure GEO-1**, the recommendations outlined within the Projects preliminary geotechnical evaluation, the impacts would be reduced to less than significant

Rockfall Hazards

Based on the foregoing analysis, impacts due unstable geologic units or soils that could potentially result in rockfall hazards and hydro-collapse would be potentially significant prior to mitigation, while impacts due to landslides and subsidence would be less than significant.

Mitigation: See **Mitigation Measure GEO-1** outlined within Section 12, “Liquefaction Potential Zone”.

Monitoring: See monitoring outlined within Section 12, “Liquefaction Potential Zone”.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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15. Ground Subsidence

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

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Source(s): Riverside County General Plan Figure S-7 “Documented Subsidence Areas Map”; (Riverside County, 2020a); Riverside County General Plan EIR No. 441, Figure 4.10.5 (Riverside County 2020b); Updated Preliminary Geotechnical Report (AGS, 2018); Geotechnical Due Diligence Evaluation and Review of Proposed Residential Development, Tentative Tract Map 39011, North of El Sobrante Road, County of Riverside, California (LGC, 2024)

Findings of Fact:

The Project site is underlain with hard, granitic bedrock with limited thickness of sediments below the site. Accordingly, the potential for subsidence due to settlement is very unlikely. Impacts associated with ground subsidence would be less than significant. (AGS, 2018, p. 9)

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

16. Other Geologic Hazards

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

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Source(s): Project Application Materials; Riverside County General Plan EIR No. 441 (Riverside County, 2020b); Google Earth Pro (Google Earth, 2023); Geotechnical Due Diligence Evaluation and Review of Proposed Residential Development, Tentative Tract Map 39011, North of El Sobrante Road, County of Riverside, California (LGC, 2024)

Findings of Fact:

- a) A seiche is a free-standing wave oscillation on the surface of water in an enclosed or semi-enclosed basin. The wave can be initiated by an earthquake and can vary in height from several centimeters to a few meters. The Project site is located 0.5 mile north of Lake Mathews; however, and as noted by EIR No. 441, which addresses the County’s 2021 update to the General Plan, only two water bodies in Riverside County have the potential to result in a seismically-induced seiche that could affect occupied property: Lake Elsinore and Lake Perris Reservoir (Riverside County, 2020b). Additionally, LMWAP Figure 10, Lake Mathews/Woodcrest Area Plan Flood Hazards, shows that the Project site is located just northeast of areas that would be subject to inundation in the event of a failure of the Lake Mathews Dam, and thus the Project site is not subject to hazards associated with dam inundation. The fact that the site is not subject to dam inundation hazards further demonstrates that the Project site is not subject to inundation from seiches. Accordingly, impacts due to a seiche would be less than significant. (AGS, 2018, pp. 9-10)

Additionally, located northerly of the project site is a reclaimed water reservoir owned, operated and maintained by WMWD.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Based on the foregoing analysis, impacts due to geologic hazards, such as seiche, mudflow, and/or volcanic hazards would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Google Earth Pro (Google Earth, 2023); Project Application Materials; Updated Preliminary Geotechnical Report (AGS, 2018); Geotechnical Due Diligence Evaluation and Review of Proposed Residential Development, Tentative Tract Map 39011, North of El Sobrante Road, County of Riverside, California (LGC, 2024)

Findings of Fact:

- a) The Project site contains gently sloping topography under existing conditions and does not contain any unique topographic features or steep natural or manufactured slopes. Implementation of the Project would result in mass grading activities over approximately 36.55 acres. Grading proposed by the Project would result in moderate changes to the site's topography and ground surface relieve features. All proposed cut and fill slopes would be constructed at a maximum gradient of 2:1, on which LGC recommends that design level slope stability analysis be performed. Cut and fill slopes are expected to be globally stable. (LGC, 2024, p. 5) Impacts associated with the proposed changes to the site's topography and ground surface relief features has been evaluated throughout this initial study under appropriate subject sections; in all cases, where significant impacts are identified due to the Project's proposed changes to topography and/or surface relief features (e.g., erosion, flooding, etc.), feasible mitigation measures have been imposed to ensure impacts are reduced to below a level of significance or to the maximum feasible extent. There are no components of the Project's proposed grading and development that would result in significant environmental effects not otherwise addressed in this subsection or throughout this initial study. Accordingly, impacts due to a change to topography and/or ground surface relief features would be less than significant.
- b) All slopes proposed by the Project's are designed at a maximum gradient of 2:1. However, proposed cut and fill slopes have been designed at a maximum height of 30 feet. The proposed heights of both cut and fill slopes could result in potential impacts due to slope stability. Absent adherence to the recommendations contained in the Project's geotechnical study, impacts due to proposed cut and fill slopes, and their attendant potential for failure, represents a potentially significant impact however with the implementation of **Mitigation Measure GEO-1**, the recommendations outlined within the Projects preliminary geotechnical evaluation, the impacts would be reduced to less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- c) Under existing conditions, there are no subsurface sewage disposal systems on the property. As such, the Project would not affect or negate any subsurface sewage disposal system during grading operations. No impact would occur.

The Project would install a domestic sanitary sewer system that would connect to Western Municipal Water District (WMWD) facilities for the purpose of conveying and treating wastewater generated by the Project. The Project does not propose the use of septic tanks or alternative waste water disposal systems. Accordingly, no impact would occur.

Mitigation: See **Mitigation Measure GEO-1** outlined within Section 12, "Liquefaction Potential Zone".

Monitoring: See monitoring outlined within Section 12, "Liquefaction Potential Zone".

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

Source(s): U.S.D.A. Soil Conservation Service Soil Surveys (NRCS, 2024); Project Application Materials; Updated Preliminary Geotechnical Report (AGS, 2018); Geotechnical Due Diligence Evaluation and Review of Proposed Residential Development, Tentative Tract Map 39011, North of El Sobrante Road, County of Riverside, California (LGC, 2024)

Findings of Fact:

- a) Approximately 33.0 acres of the Project site (90.4%) are rated as having a "slight" susceptibility to erosion, indicating that erosion is unlikely under ordinary climatic conditions; 3.5 acres (9.6%) are rated as having a "moderate" susceptibility to erosion (NRCS, 2024), indicating that some erosion is likely and that erosion-control measures may be needed. The Project would result in the removal of vegetative cover during construction activities and could result in an increase in flows that could affect erosion rates downstream. Thus, implementation of the Project has the potential to result in soil erosion. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and long-term operation.

Construction-Related Impacts

Under existing conditions, the Project site is not developed with buildings or other improvements. Exposed soils on-site are subject to erosion during rainfall events or high winds. This potential would increase during Project construction due to the removal of stabilizing vegetation and increased exposure of these erodible materials to wind and water.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Pursuant to the requirements of the State Water Resources Control Board, the Project applicant would be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. This NPDES Permit requires the Project applicant to prepare and submit to the County for approval a Project-specific Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from stormwater and non-stormwater discharges., Adherence to the requirements noted in the Project’s required site-specific SWPPP, would ensure that potential construction-related impacts associated with water and wind erosion would be reduced to below a level of significance.

Long-Term Operational Impacts

Following construction, wind and water erosion on the Project site would be minimized, as the disturbed areas would be landscaped or covered with impervious surfaces, and drainage would be controlled through a storm drain system. As part of the Project, the County is requiring the construction of stormwater facilities (such as detention basins) to reduce on-site runoff flows to pre-development conditions. As discussed in Subsection 4.9, construction of detention basins and water quality basins on-site would ensure that post-development rates and amounts of runoff are similar to those occurring under existing conditions. Accordingly, implementation of the Project would not increase the risk of siltation or erosion in stormwater discharged from the Project site. In addition, the WQMP for the Project requires post-construction measures to ensure on-going protection against erosion. Compliance with the WQMP would be required as a condition of Project approval, and long-term maintenance of on-site water quality features also would be required. Therefore, implementation of the Project would not significantly increase the risk of long-term wind or water erosion on- or off-site, and impacts would be less than significant.

- b) Based on testing of soil samples taken from the Project site by LGC, it was determined that the site’s soils have very low expansion potential. (LGC, 2024, p. 14)
- c) The Project would install a domestic sanitary sewer system that would connect to Western Municipal Water District (WMWD) facilities for the purpose of conveying and treating wastewater generated by the Project. The Project does not propose the use of septic tanks or alternative waste water disposal systems. Accordingly, no impact would occur.

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

☐
☐
☒
☐

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

Source(s): Riverside County 2019 General Plan Safety Element Figure S-8 “Wind Erosion Susceptibility Areas” (Riverside County 2020a); Ord. No. 460 (Riverside County 2023), Article XV & Ord. No. 484 (Riverside County 2023); Updated Preliminary Geotechnical Report (AGS, 2018); Geotechnical Due Diligence Evaluation and Review of Proposed Residential Development, Tentative Tract Map 39011, North of El Sobrante Road, County of Riverside, California (LGC, 2024)

Findings of Fact:

- a) Approximately 33.0 acres of the Project site (90.4%) are rated as having a “slight” susceptibility to erosion, indicating that erosion is unlikely under ordinary climatic conditions; 3.5 acres (9.6%) are rated as having a “moderate” susceptibility to erosion (NRCS, 2024), indicating that some erosion is likely and that erosion-control measures may be needed. The Project would result in the removal of vegetative cover during construction activities and could result in an increase in flows that could affect erosion rates downstream. Thus, implementation of the Project has the potential to result in soil erosion. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and long-term operation.

Construction-Related Impacts

Under existing conditions, the Project site is not developed with buildings or other improvements. Exposed soils on-site are subject to erosion during high winds. This potential would increase during Project construction due to the removal of stabilizing vegetation and increased exposure of these erodible materials to wind and water.

Pursuant to the requirements of the State Water Resources Control Board, the Project applicant would be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. This NPDES Permit requires the Project applicant to prepare and submit to the County for approval a Project-specific Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must identify and implement an effective combination of wind erosion control (i.e., Best Management Practices). Adherence to the requirements noted in the Project’s required site-specific SWPPP, would ensure that potential construction-related impacts associated with wind erosion would be reduced to below a level of significance.

Long-Term Operational Impacts

Following construction, wind erosion on the Project site would be minimized, as the disturbed areas would be landscaped or covered with impervious surfaces. Accordingly, implementation of the Project would not increase the risk of erosion from wind experienced by the Project site. Therefore, implementation of the Project would not significantly increase the risk of long-term water erosion on- or off-site, and impacts would be less than significant.

Mitigation: No mitigation is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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, 2020a), Riverside County Climate Action Plan (Riverside County 2019); Project Application Materials; Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis (Vista Environmental, 2024)

Findings of Fact:

- a) The proposed project would consist of a single-family residential development. The proposed project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste disposal, water usage, and construction equipment. A summary of the results is shown below in Table 20.1 (Vista Environmental, 2024, p. 67):

Table 20.1 - Project Related Greenhouse Gas Annual Emissions

Category	Greenhouse Gas Emissions (Metric Tons per Year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Mobile Sources ¹	1,062	0.04	0.05	1,079
Area Sources ²	4.36	<0.01	<0.01	4.38
Energy Usage ³	108	0.01	<0.01	108
Water and Wastewater ⁴	7.99	0.10	0.01	11.1
Solid Waste ⁵	5.97	0.60	<0.01	20.9
Refrigeration ⁶	--	--	--	0.17
Construction ⁷	32.4	<0.01	<0.01	32.8
Total GHG Emissions	1,221	0.75	0.07	1,256
County of Riverside CAP Threshold of Significance				3,000

Notes:

¹ Mobile sources consist of GHG emissions from vehicles.

² Area sources consist of GHG emissions from consumer products, architectural coatings, hearths, and landscaping equipment.

³ Energy usage consists of GHG emissions from electricity and natural gas usage (non-hearths). PDF-1 requires the project to be all-electric.

⁴ Water includes GHG emissions from electricity used for transport of water and processing of wastewater.

⁵ Waste includes the CO₂ and CH₄ emissions created from the solid waste placed in landfills.

⁶ Refrigeration includes GHG emissions from refrigerants used in air conditioning units.

⁷ Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.

Source: CalEEMod Version 2022.1.

The data provided in Table 20.1 shows that the proposed project would create 1,256 MTCO₂e per year. According to the County of Riverside CAP threshold of significance, if a project creates less than 3,000 MTCO₂e per year, the GHG emissions from the proposed project is determined to be less than significant. It should also be noted, that the proposed structures will be required to meet the most current Title 24 Part 6 building standards that require all new homes to be designed to use net zero energy, through a

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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combination of energy efficiency measures as well as requiring all new homes to install rooftop photovoltaic systems that are of adequate size to generate enough electricity to meet the net-zero energy requirements. The County also requires that the all new developments to institute the water conservation measures that are detailed in the California Green Building Code. In addition, the project applicant has committed to implementing PDF-1 that requires the proposed project to be an All-Electric Development, as such there would be no natural gas use from the operation of the proposed project that would further reduce GHG emissions above current State and County regulations. For these reasons, a less than significant generation of greenhouse gas emissions would occur from construction and operation of the proposed project. (Vista Environmental, 2024, p. 67)

- b) The County of Riverside adopted the County of Riverside Climate Action Plan (CAP) on December 2015 and updated November 2019. The 2015 CAP utilized a GHG emissions reduction target of a 15 percent decrease from 2008 levels by the year 2020, in order to meet the requirements of AB 32 and SB 375. The CAP was updated in 2019 in order to address a 2017 Settlement Agreement with the Sierra Club and other groups as well as to bring the CAP in conformance with SB 32 and AB 197 that set a statewide 2030 goal of reducing GHG emissions to 40 percent below 1990 levels by 2030. The 2017 Settlement Agreement updated the CAP to also be in alignment with the goal and policies for new development provided in California’s 2017 Climate Change Scoping Plan, prepared by CARB, November 2017. Specifically, the 2017 Settlement Agreement now requires all new residential developments to install EV charging stations in the garages of new residential units, requires rooftop solar PV systems to be installed on all new homes and new commercial buildings that total more than 100,000 square feet of building space, and use of high-efficiency bulbs in new traffic signals. (Vista Environmental, 2024, p. 68)

The CAP has developed a process for determining significance of GHG impacts from new development projects that includes (1) applying an emissions level that is determined to be less than significant for small projects, and (2) utilizing Screening Tables to mitigate project GHG emissions that exceed the threshold level. The CAP has provided a threshold of 3,000 MTCO₂e per year, which was based on capturing 90 percent of emission from all projects in the County, to be used to identify projects that require the use of Screening Tables or a project-specific technical analysis to quantify and mitigate project emissions. The proposed project would generate 1,256 MTCO₂e per year, which is within the 3,000 MTCO₂e per year threshold. It should also be noted, that the proposed homes will be required to meet PDF-1 that requires the proposed project to be an All-Electric Development and the most current Title 24 Part 6 building standards that require all new homes to be designed to use net zero energy, through a combination of energy efficiency measures as well as requiring all new homes to install rooftop photovoltaic systems that are of adequate size to generate enough electricity to meet the net-zero energy requirements. Therefore, the proposed project would be consistent with the CAP and potential impacts would be less than significant in this regard. (Vista Environmental, 2024, p. 68)

Therefore, the proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases, and would be a less than significant 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
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HAZARDS AND HAZARDOUS MATERIALS Would the project:

21. Hazards and Hazardous Materials

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

☐ ☐ ☒ ☐

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

☐ ☐ ☒ ☐

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

☐ ☐ ☐ ☒

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

☐ ☐ ☐ ☒

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

☐ ☐ ☐ ☒

Source(s): Project Application Materials; Google Earth Pro (Google Earth, 2023); Department of Toxic Substances Control (DTSC) - Envirostor Database (DTSC, 2023); Phase I Environmental Site Assessment Update Report (GeoScience, 2024)

Findings of Fact:

- a) Implementation of the proposed Project has the potential to expose future site workers and/or residents to hazardous materials or conditions associated with the existing site conditions, construction activities, and long-term operation of the proposed Project. Each is discussed below.

Existing Site Conditions

The Project site between 1931 and 1953 was undeveloped land. The Project site was fully developed with orchards from the late-1960s to the early 2000s. The orchards on the Project site appear to have been cleared in 2006. From 2006 to 2020, the Project site appears to have been vacant land. (Geoscience, 2024, p. 7)

Prior to the mid-1960s, the area surrounding the Project site was undeveloped. Areas surrounding the Project site became increasingly developed in the late 1930s to the early 1940s with orchards and other uses surrounding Lake Mathews. The area immediately surrounding the Project site was fully developed as orchards from the mid-1960s through the early 2000s. From the mid-2000s to present day, the surrounding properties were developed for residential purposes. (Geoscience, 2024, p. 7)

Based on a review of state and local information sources for the Project site and surrounding areas, the Project site and areas within 0.5-mile of the site were not identified on any of the following information

sources: Department of Toxic Substances Control; EnviroStor; California Regional Water Quality Board (RWQCB) GeoTracker; National Pipeline Mapping System GeoTracker; and the State of California Department of Oil, Gas, and Geothermal Resources. Additionally, several planning permits were reviewed on the Riverside County Transportation and Land Management Agency (TLMA) website, and no building, plumbing, grading, or electrical permits were available for the Project site. (Geoscience, 2024, p. 9-10)

Areas of dumping were observed in northwest portion of the Project site. The waste piles contained regular household debris. Indications of fill sites were not observed during the site reconnaissance. (Geoscience, 2024, p.15)

No buildings were observed during the site reconnaissance. For properties with a history of agriculture use, such as the Project site, many underground irrigation or drainage pipes may exist. Some pipes may be constructed of asbestos-containing material such as “Transite” brand asbestos concrete pipe. Two pipes of irrigation piping were observed on the Project site. (Geoscience, 2024, p. 15)

Construction Related Activities

Heavy equipment that would be used during construction of the proposed Project would be fueled and maintained by substances such as oil, diesel fuel, gasoline, hydraulic fluid, and other liquid materials that would be considered hazardous if improperly stored or handled. In addition, materials such as paints, roofing materials, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials could result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with future development that would be a reasonable consequence of the proposed Project than would occur on any other similar construction site. Thus, impacts due to construction activities would not cause a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. A less-than-significant impact would occur.

Long Term Operation

The proposed Project consists of a proposal of a 73-unit residential development. Residential uses are not typically associated with the transport, use, or disposal of hazardous materials. Household goods used by residential homes that contain toxic substances are usually low in concentration and small in amount; therefore, there is no significant risk to humans or the environment from the use of such materials. Future residents would be required to dispose of household hazardous waste, including pesticides, batteries, old paint, solvents, used oil, antifreeze, and other chemicals, at a Household Hazardous Waste Collection Facility. Also, as of February 2006, fluorescent lamps, batteries, and mercury thermostats can no longer be disposed in the trash. Furthermore, the transport, use, and disposal of hazardous materials are fully regulated by the USEPA, State of California, and/or Riverside County. With mandatory regulatory compliance, potential hazardous materials impacts associated with long-term operation of the Project would be less than significant.

- b) As indicated under the discussion and analysis Threshold a), near-term construction activities would not have a significant impact associated with hazardous materials handling or disposal. The potential for an accidental release of hazardous materials into the environment is no greater than the potential on any

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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other construction site. Thus, the hazard due to the foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be less than significant.

Long-term operation of the proposed Project also would not result in any significant adverse effects associated with hazardous materials handling or disposal. Residential uses are not associated with the transport, use, or disposal of hazardous materials. Household goods used by residential homes that contain toxic substances are usually low in concentration and small in amount; therefore, there is no significant risk to humans or the environment from the use of such materials. Accordingly, the proposed Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant.

- c) The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. During construction and at Project build-out, the proposed Project would be required to maintain adequate access for emergency vehicles. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.
- d) The nearest existing school to the Project site is Lake Mathews Elementary School, located approximately 0.5-mile west of the Project site (Google Earth, 2023). Accordingly, the Project does not have the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Accordingly, no impact would occur.
- e) According to the Phase I Site Assessment prepared for the Project the Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code § 65962.5 (GeoScience, 2024, p. 13-15). Accordingly, no impact would occur.

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
22. 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” (Riverside County 2020a); Riverside County Information Technology – Map My County (RCIT, 2023); Google Earth Pro (Google Earth, 2023)

Findings of Fact:

- a) The Project site is not located within any known Airport Influence SWAP Area or Airport Safety Zone (RCIT, 2023). Accordingly, implementation of the project does not have the potential to result in an inconsistency with an Airport Master Plan and no impacts would occur.
- b) The Project site is not located within any known Airport Influence SWAP Area or Airport Safety Zone (RCIT, 2023). Accordingly, implementation of the Project will not require review by the Airport Land Use Commission, thus no impacts would occur.
- c) The Project site is located approximately 5.2 miles southeast of the nearest runway at the Riverside Municipal Airport. The Project site is not located within any known Airport Influence SWAP Area or Airport Safety Zone (RCIT, 2023; Google Earth, 2023). The Project would not result in safety hazards for people residing or working in the area as the result of being in the vicinity of a public or private airport. Accordingly, no impacts would occur.
- d) The Project site is located within the vicinity a small private airstrip, however, based on aerial photographs from Google Earth, this airstrip has not been operational since at least 2011 because a large yellow “X” is painted at the beginning of the runway (a universal aviation symbol for a runway closed to all operations) and the runway has been covered in dirt. The Project site is not within the vicinity of any other private airstrips or heliports (RCIT, 2023; Google Earth, 2023). Accordingly, implementation of the project would not result in safety hazards for people residing or working in the area as the result of being in the vicinity of a public or private airport. Accordingly, no impacts would occur.

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
HYDROLOGY AND WATER QUALITY Would the project:				
23. 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” (Riverside County 2020a); Figure S-10 “Dam Failure Inundation Zone” (Riverside County 2020a); CA Regional Water Quality Control Board (RWQCB) - Order No. R8-2010-0033 (RWQCB, 2010); Riverside County Ord. 754.1 (Stormwater Management/Discharge Controls) (Riverside County, 2023); Riverside County Information Technology – Map My County (RCIT, 2023); SARWQCB Santa Ana Region Basin Plan (RWQCB, 2019); FEMA Flood Insurance Rate Map (FIRM) Map No. 06065C1385G (FEMA, 2008); Western Municipal Water District Urban Water Management Plan (WMWD, 2015); CA Department of Water Resources – Basin Maps (CDWR, 2023); Preliminary Hydrology Study Tract Map 39011 (Adkan, 2024a), Project Specific Preliminary Water Quality Management Plan Tract 39011 (WQMP) (Adkan, 2024b)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Findings of Fact:

a) Construction Related Water Quality Impacts

Grading and construction of the proposed Project would involve substantial ground disturbance resulting in the generation of pollutants such as silt, debris, chemicals, paints, and other solvents potentially affecting water quality. As such, short-term water quality impacts would likely occur in the absence of any protective or avoidance measures. Pursuant to requirements of the SWRCB, the Project Applicant is required to obtain an NPDES permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. Compliance with the NPDES permit involves the preparation and implementation of a SWPPP for construction related activities. The SWPPP would specify BMPs to minimize pollutants in storm water runoff, as well as non-storm water discharges. Typical measures employed during construction include the use of water trucks to minimize erosion; use of straw bale barriers; stabilizing construction entrances; hydroseeding, etc. The implementation of this plan would serve to prevent and/or minimize discharge of additional sources of polluted runoff and hence, protect water quality. Therefore, water quality impacts associated with construction activities are evaluated as less than significant and no mitigation measures would be required beyond compliance with the mandatory regulatory requirements (i.e., implementation of BMPs from a Project- specific SWPPP) described herein.

Post Development Related Water Quality Impacts

Implementation of the proposed Project would permanently alter the amount of impervious surfaces as a result of newly constructed roadways, structures, and other paved surfaces such as driveways, walkways, parking lots, and other residential-related hardscape. As a result, there would be an increase in storm water runoff requiring treatment when compared with existing conditions. This runoff would contain such urban pollutants as tire-wear residues; petroleum products such as oil and grease; landscaping fertilizer and pesticides; as well as litter and other types of wastes. Other potential sources of urban pollutants include bacterial indicators, nutrients, pesticides, sediments, trash/debris, oil, and grease (Adkan, 2024b, p. 13). The pollutants are washed off from the street surfaces by a rainfall adequate to produce sufficient runoff. The EPA has identified street surfaces as the primary source of pollution in urban areas, and such runoff is considered to be a “non-point” source. Unlike “point” source wastes, non-point sources cannot be quantified through flow measurement, sampling, and analysis techniques. This runoff, typical of urban use, would contribute to the incremental degradation of the water quality downstream if not properly treated.

Compliance with the County’s NPDES permit requirements, as stipulated in the CWA, would reduce impacts to water quality associated with Project-related activities. The NPDES permit requires the preparation of a post-construction management program, such as a WQMP, to ensure ongoing protection of the watershed basin by requiring structural and programmatic controls. A WQMP was prepared for the proposed Project and identifies non-structural and structural source controls as well as Project design features and BMPs. Structural controls include signage and stenciling; landscape and irrigation system design to include preservation of native trees within conservation areas; and landscape design to provide for minimal irrigation, fertilizers, and pesticides. Non-structural source controls include: the provision of educational materials to residents; providing education to maintenance staff regarding prohibitions; and sweeping sidewalks and streets regularly to prevent litter from accumulating. The Project’s WQMP also outlines the long-term funding mechanisms and contractual obligations for the operation and

maintenance of the Project’s water quality features. The on-site detention/water quality basins within the public right-of-way would be maintained by the Riverside County Flood Control and Water Conservation District (RCFCWCD), while private storm drainage facilities would be maintained by a Community Facility District (CFD) (Adkan, 2024b, p. 19)

The Project’s WQMP has been prepared in accordance with the Santa Ana Region Hydromodification Management Plan and Riverside County requirements. The proposed storm drain design was developed to maintain existing drainage patterns to the maximum extent practicable. The system collects flows generated on-site and flows generated off-site that are tributary to the Project site and conveys the flows via an underground storm water drain system to an extended detention basin planned in the southwest corner of the site. The extended detention basin is proposed to capture and treat the flows from tributary areas. These primary design features minimize urban runoff, limit the impervious footprint, maximize water conservation areas, and minimize the connection of impervious areas. Adherence to statutory requirements would ensure that water quality and waste discharge requirements are not violated.

Existing Drainage Condition

The Project site consists of a ridgeline along the northerly boundary of the site. The ridgeline can also be defined by an unpaved road seen within aerial imagery providing a means of maintenance access for an existing reservoir owned by Western Municipal Water District (WMWD) directly north of the Project site. From the ridge line the existing flows travel south into a natural drainage course that bounds the south edges of the project site. The natural drainage course flows from east to west along the southerly project boundary, continues westerly and ultimately conveys flows northwesterly before being conveyed northerly beyond the project through a development to the northwest of the project site, known as Tramonte, and finally into the Harrison Dam facility. The drainage course has been deeply incised and defined throughout time, and in many locations exhibit exposed bedrock limiting the potential for future erosion. (Adkan 2024a, p. 5)

The Harrison Dam was constructed based on the development of the upstream tributaries to protect the downstream properties located in the City of Riverside. The Dam was designed to detain the watershed of the proposed project, including the upstream properties, to a maximum discharge of 150 CFS. Based on the projects clustering efforts it was determined through discussion with RCFCWCD that additional post development increased storm water runoff mitigation would be necessary beyond the normally required 2-, 5-, and 10-year storm events, and therefore detention basins are required for the project to be designed with the capacity to mitigate the 100-year storm events. (Adkan 2024a, p. 5)

From the Harrison Dam facility existing storm flows are conveyed through the City of Riverside and ultimately into the Arizona Channel owned and maintained by RCFCWCD. The Arizona Channel is part of a drainage system funded by Area Drainage Plan fees known at the Southwest Area Drainage Plan. (Adkan 2024a, p. 5)

Proposed Drainage Condition

The project site has been designed in such a manner to respect the existing drainage pattern from north to south. The project maintains one distinct drainage tributary on the southwesterly portion of the site. The entire project site is conveyed into one extended detention basin on the southwest side of the project. This southwest location is the project’s single point of flows leaving the project site. All preliminary storm

drainage facilities and catch basins have been proposed within the proposed project to limit the spread of the 100 year on-site flows to be contained within tops of the street curbs. (Adkan 2024a, p. 6)

As discussed within the Existing Drainage Condition section, it was determined through discussion with RCFCWCD that additional post development increased storm water runoff mitigation would be necessary beyond the 2-, 5-, and 10-year storm events, and therefore the extended detention basin is required for the project to be designed with the capacity to mitigate the 100-year storm events. These calculations were performed utilizing the Synthetic Unit Hydrograph Method and a summary of the results are included within the table below comparing the existing flow rates with the proposed flow rates when mitigated through attenuation of storm runoff within proposed extended detention basin. (Adkan 2024a, p. 6)

These primary design features minimize urban runoff, limit the impervious footprint, maximize water conservation areas, and minimize the connection of impervious areas. Adherence to statutory requirements would ensure that water quality and waste discharge requirements are not violated. As such, with respect to the potential to violate water quality standards and waste discharge requirements and further degrade existing surface or ground water quality, or otherwise substantially degrade water quality, the Project would result in less-than-significant impacts.

Table 23-1
Tract 39011 Unit Hydrograph Summary

Storm Event	Existing Condition		Developed Condition		Post-Developed with Basin		
	Flow (cfs)	Volume (ac.ft.)	Flow (cfs)	Volume (ac.ft.)	Routed Basin Out Flow (cfs)	Storage Volume (ac.ft.)	Depth (ft)
2 Year - 1 Hour	30.554	0.6278	25.641	0.7357	0.449	0.717	2.50
2 Year - 3 Hour	13.856	0.5661	11.146	0.9719	0.772	0.914	3.09
2 Year - 6 Hour	12.162	0.6045	9.624	1.3136	0.887	1.181	3.80
2 Year - 24 Hour	0.948	0.4342	3.509	2.1321	1.019	1.456	4.48
5 Year - 1 Hour	44.651	1.0447	37.322	1.0675	0.803	1.033	3.41
5 Year - 3 Hour	21.206	1.0214	17.949	1.3939	0.952	1.308	4.12
5 Year - 6 Hour	19.939	1.1974	16.631	1.9210	8.812	1.623	4.86
5 Year - 24 Hour	3.870	0.9101	4.970	3.0199	4.010	1.592	4.79
10 Year - 1 Hour	59.023	1.6866	49.784	1.4893	1.013	1.443	4.44
10 Year - 3 Hour	30.474	2.2396	26.251	1.9110	11.155	1.638	4.90
10 Year - 6 Hour	29.531	2.8266	25.382	2.6439	24.460	1.696	5.03
10 Year - 24 Hour	9.267	3.2965	7.088	3.7320	7.022	1.612	4.84
100 Year - 1 Hour	94.449	2.8019	81.396	2.5933	64.192	1.776	5.20
100 Year - 3 Hour	48.943	3.9062	43.793	3.3629	43.670	1.735	5.11
100 Year - 6 Hour	49.076	5.4579	43.960	4.7524	42.013	1.732	5.10
100 Year - 24 Hour	16.610	6.7703	14.431	6.7447	14.338	1.658	4.94

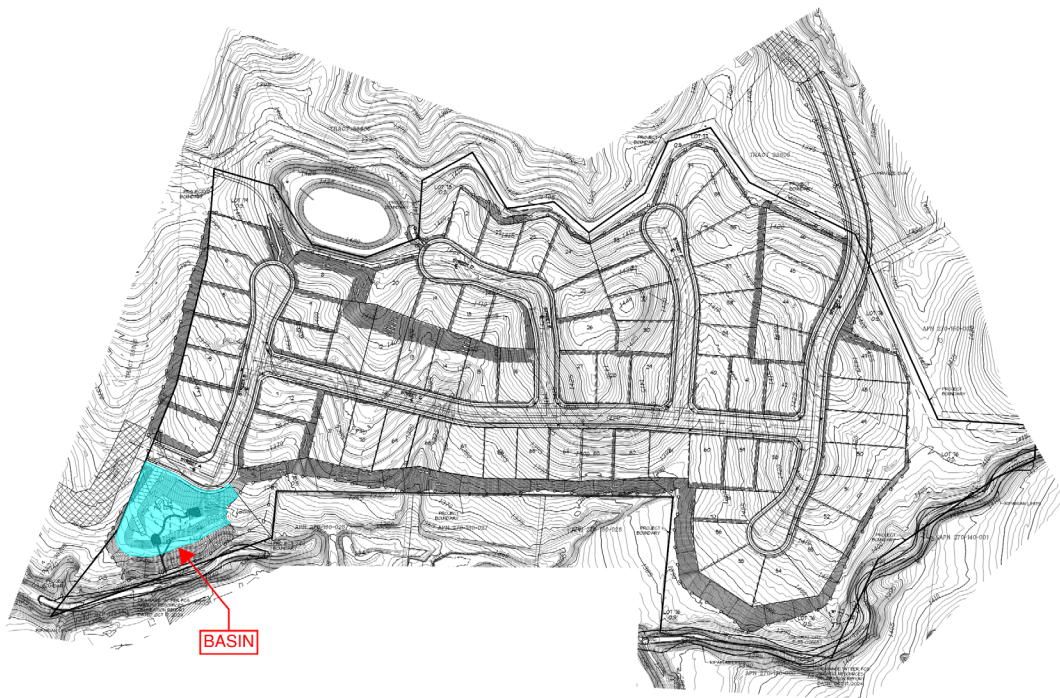


Figure 23.1 – Extended Detention Location

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- b) The Project site is not located within a Groundwater Management Zone. However, runoff from the Project site ultimately would be conveyed to the north towards the Arlington GMZ. Because the total amount of runoff from the site following development would be similar to existing conditions, the Project would have no potential to interfere substantially with groundwater recharge and impacts would be less than significant.
- c) The Project site consists of a ridgeline along the northerly boundary of the site. The ridgeline can also be defined by an unpaved road seen within aerial imagery providing a means of maintenance access for an existing reservoir owned by Western Municipal Water District (WMWD) directly north of the Project site. From the ridge line the existing flows travel south into a natural drainage course that bounds the south edges of the project site. The natural drainage course flows from east to west along the southerly project boundary, continues westerly and ultimately conveys flows northwesterly before being conveyed northerly beyond the project through a development to the northwest of the project site, known as Tramonte, and finally into the Harrison Dam facility. The drainage course has been deeply incised and defined throughout time, and in many locations exhibit exposed bedrock limiting the potential for future erosion. (Adkan 2024a, p. 5)

The Harrison Dam was constructed based on the development of the upstream tributaries to protect the downstream properties located in the City of Riverside. The Dam was designed to detain the watershed of the proposed project, including the upstream properties, to a maximum discharge of 150 CFS. Based on the projects clustering efforts it was determined through discussion with RCFCWCD that additional post development increased storm water runoff mitigation would be necessary beyond the normally required 2-, 5-, and 10-year storm events, and therefore detention basins are required for the project to be designed with the capacity to mitigate the 100-year storm events. (Adkan 2024a, p. 5)

From the Harrison Dam facility existing storm flows are conveyed through the City of Riverside and ultimately into the Arizona Channel owned and maintained by RCFCWCD. The Arizona Channel is part of a drainage system funded by Area Drainage Plan fees known at the Southwest Area Drainage Plan. (Adkan 2024a, p. 5)

The project site has been designed in such a manner to respect the existing drainage pattern from north to south. The project maintains one distinct drainage tributary on the southwesterly portion of the site. The entire project site is conveyed into one extended detention basin on the southwest side of the project. This southwest location is the project's single point of flows leaving the project site. All preliminary storm drainage facilities and catch basins have been proposed within the proposed project to limit the spread of the 100 year on-site flows to be contained within tops of the street curbs. (Adkan 2024a, p. 6)

As discussed within the Existing Drainage Condition section, it was determined through discussion with RCFCWCD that additional post development increased storm water runoff mitigation would be necessary beyond the 2-, 5-, and 10-year storm events, and therefore the extended detention basin is required for the project to be designed with the capacity to mitigate the 100-year storm events. It should be noted that while the peak run-off values of the storm events are being mitigated, the volumes of the post development condition are not being reduced when compared to the pre-development condition, providing continued sustainability for downstream habitat and wildlife. These calculations were performed utilizing the Synthetic Unit Hydrograph Method and a summary of the results are included

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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within Table 23-1 in Section 23(a) comparing the existing flow rates with the proposed flow rates when mitigated through attenuation of storm runoff within proposed extended detention basin. (Adkan 2024a, p. 6)

These primary design features minimize urban runoff, limit the impervious footprint, maximize water conservation areas, and minimize the connection of impervious areas. Adherence to statutory requirements would ensure that water quality and waste discharge requirements are not violated. As such, with respect to the potential to violate water quality standards and waste discharge requirements and further degrade existing surface or ground water quality, or otherwise substantially degrade water quality, the Project would result in less-than-significant impacts.

- d) All runoff from proposed development areas within the tributary drainage areas would be treated by the extended detention basin prior to runoff, which would remove sediments, and because peak flow rates would also be decreased, as discussed within Section 23(a) "Hydrology and Water Quality", above, the Project would not substantially alter the existing drainage velocities of the site or area, including the alteration of the velocities of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site, thus the impacts would be less than significant.
- e) As discussed within Section 23(c) "Hydrology and Water Quality", above, the Project would result in a net decrease in the rate of runoff from the site under 100 year and 10-year storm conditions. Because the proposed Project has been designed to attenuate post-development runoff from the site, Project-related runoff would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site. Furthermore, all onsite drainage facilities have been designed to convey the 100-year storm event per the requirements of the Riverside County Transportation Department and Riverside County Flood Control. Accordingly, the impacts would be less than significant.
- f) As discussed within Section 23(c) "Hydrology and Water Quality", above, the Project would result in a net decrease in the rate of runoff from the site under 100-year and 10-year storm conditions. Because the proposed Project has been designed to attenuate post-development runoff from the site, Project-related runoff would not substantially increase the rate or amount of surface runoff in downstream. Additionally, the downstream facilities, "Harrison Dam", were designed by Riverside County Flood Control based on the land use designation of the project site. The Project is not proposing to increase the density and impervious areas associated with the underlying land use, therefore the assumption for offsite run-off to the Harrison Dam facility have not increased and the Project would not exceed the downstream capacity, thus the impacts would be less than significant.

Furthermore, all sources of pollutants associated with a residential development have been identified within the Project Specific Water Quality Management Plan (WQMP). The WQMP identifies non-structural and structural source controls as well as Project design features and BMPs to treat the pollutants identified as a source of contamination. In this case the Project is proposing to treat the expected pollutants of concern with an extended detention basin, location shown within Figure 23.1.

The Extended Detention Basin (EDB) is designed to detain the design volume of stormwater, VBMP, and maximize opportunities for volume losses through infiltration, evaporation, evapotranspiration and surface wetting. Additional pollutant removal is provided through sedimentation, in which pollutants can attach to sediment accumulated in the basin through the process of settling. Stormwater enters the EDB

through a forebay where any trash, debris, and sediment accumulate for easy removal. Flows from the forebay enter the basin which is vegetated with native grasses that enhance infiltration and evapotranspiration, and which is interspersed with gravel-filled trenches that help further enhance infiltration. Water that does not get infiltrated or evapotranspired is conveyed to the bottom stage of the basin. At the bottom stage of the basin, low or incidental dry weather flows will be treated through a sand filter and collected in a subdrain structure. Any additional flows will be detained in the basin for an extended period by incorporating an outlet structure that is more restrictive than a traditional detention basin outlet. The restrictive outlet structure extends the drawdown time of the basin which further allows particles and associated pollutants to settle out before exiting the basin, while maximizing opportunities for additional incidental volume losses. Accordingly with the incorporation of the extended detention basin, the Project would not generate substantial additional sources of polluted runoff, therefore the impacts would be less than significant.

- g) According to FEMA Flood Insurance Rate Map (FIRM) Map No. 06065C1385G, the Project site is located within "Zone X (unshaded)," which is defined as an area not subject to 100- year flood hazards (FEMA, 2008). Accordingly, the Project has no potential to place housing or structures within a flood hazard zone that would potentially impede or redirect flood flows. Additionally, the proposed project is adjacent to an existing drainage course. The project is proposing to conserve the drainage course as discussed within Section 7, "Biological Resources", and no grading and or obstructions are proposed within the existing drainage course. Furthermore, all other proposed drainage crossings have been designed to convey the 100-year storm events and will allow all run-on flows to continue downstream without impeding or redirecting flood flows. Accordingly, impacts would be less than significant.
- h) As discussed within Section 23(f) "Hydrology and Water Quality", above, according to FEMA Flood Insurance Rate Map (FIRM) Map No. 06065C1385G, the Project site is located within "Zone X (unshaded)," which is defined as an area not subject to 100- year flood hazards (FEMA, 2008). Accordingly, the project is not within a flood hazard area and does not have the risk of inundation. Additionally, without the risk of inundation and pollutants from the Project will be conveyed the project design features and BMP's as identified with the project specific WQMP for treatment and removal. Thus, impacts would be less than significant

A seiche is a free-standing wave oscillation on the surface of water in an enclosed or semi-enclosed basin. The wave can be initiated by an earthquake and can vary in height from several centimeters to a few meters. The Project site is located 0.5 mile north of Lake Mathews; however, and as noted by EIR No. 441, which addresses the County's 2021 update to the General Plan, only two water bodies in Riverside County have the potential to result in a seismically-induced seiche that could affect occupied property; Lake Elsinore and Lake Perris Reservoir (Riverside County, 2020b), and there would be no impacts.

The County of Riverside is not located within a Tsunami Hazard Area as identified by the California Department of Conservation, and there would be no impacts.

- i) The Project is consistent with the County's NPDES permit requirements, as stipulated in the CWA, and would reduce impacts to water quality associated with Project-related activities. The project is not located within a regional water quality management plan, however the Project under the NPDES permit requires the preparation of a site-specific post-construction management program, such as a WQMP, to ensure ongoing protection of the watershed basin by requiring structural and programmatic controls. A WQMP

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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was prepared for the proposed Project and identifies non-structural and structural source controls as well as Project design features and BMPs. Additionally, the Project site is not located within a Groundwater Management Zone and/or Plan and has no potential to interfere substantially with groundwater recharge. Accordingly, there would be no impacts.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

LAND USE AND PLANNING Would the project:

24. Land Use

a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Source(s): Project Application Materials; Riverside County General Plan (Riverside County, 2020a); Lake Mathews / Woodcrest Area Plan (Riverside County, 2020c); City of Riverside General Plan Land Use Element (City of Riverside, 2021)

Findings of Fact:

- a) The Project site consists of approximately 36.55 acres of land which is predominantly undeveloped under existing conditions. Development of the Project site by the proposed construction and operation of residential, recreational, and open space uses would not physically disrupt or divide the arrangement of an established community. Existing and proposed residential communities surround the Project site to the north and southwest; however, there are no components of the proposed Project with the potential to physically divide any of these existing or planned communities. Upon completion of the proposed Project, pedestrian pathways and public roadways would be accommodated in portions of the development, which would ensure that access to and between surrounding residential neighborhoods would not be affected. Therefore, the Project would not physically divide an established or planned community and thus impacts would be less than significant.
- b) The Project would not conflict with any applicable General Plan policies adopted for the purpose of avoiding or reducing significant environmental effects. As part of its review of the proposed Project, Riverside County evaluated the Project's consistency with applicable General Plan policies and determined that the Project conforms to all applicable General Plan policies, including the policies listed within the LMWAP and the LMWAP El Sobrante Policy Area. Based on the Project acreages, and the and the maximum number of dwelling units assigned by the El Sobrante Policy Area, outlined within the Lake Matthews and Woodcrest Area Plans, the maximum unit count is 73 total residential units, consist with the proposed Projects subdivision map. Furthermore, per the LMWAP El Sobrante Policy Areas the lot sizes are a minimum of 10,000 square feet, consistent with the Projects proposed lot sizes.

Additionally, the project site is located within an Agricultural Preserve (El Sobrante No. 1). The agricultural preserve precludes use of the Project site for any use other than agriculture uses. The Project proposes

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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an Agricultural Preserve Diminishment to remove the Project site from the El Sobrante No. 1 Agricultural Preserve area (AGD250001). Approval of AGD250001 by the Riverside County Board of Supervisors would eliminate any potential General Plan land use inconsistency that may result from future development of the subject property with residential land uses.

Based on the Project's consistency with the General Plan Policies, impacts due to an inconsistency with the land use designations and/or policies of the General Plan adopted for the purpose of reducing or avoiding significant environmental effects would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

MINERAL RESOURCES Would the project:

25. Mineral Resources

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

Source(s): Riverside County General Plan Figure OS-6 "Mineral Resources Area" (Riverside County 2020a); Riverside County General Plan EIR No. 441, Figure 4.12.1 (Riverside County, 2020b); Riverside County Information Technology – Map My County (RCIT, 2023); Google Earth Pro (Google Earth, 2023); California Department of Conservation, Mineral Resources Maps for the Temescal Valley (CDC, 1991)

Findings of Fact:

- According to mapping information from the California Department of Conservation (CDC), the Project site is located within the "MRZ-3" Mineral Resource Zone. This category represents "Areas containing known or inferred mineral occurrences of undetermined mineral resource significance" (CDC, 1991, Plates 2A, 3A, 4A, 5A, and 6A). Accordingly, implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State, and no impact would occur.
- Neither the County's General Plan nor the LMWAP identify the Project site as comprising a locally important mineral resources recovery site, and there are no other plans applicable to the Project site that designate it for mineral resources recovery. Accordingly, no impact would occur.
- According to Riverside County GIS records, there have been no surface mining permits issued within the Project vicinity, indicating that there are no existing surface mines in the Project vicinity (RCIT, 2023). Additionally, there are no State classified or designated areas for mineral resources within the Project

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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vicinity. There are no mines or quarries proposed by the Project nor are any existing or former mines known to exist on the site or in the surrounding area (Google Earth, 2023). Due to the lack of surface mines in the Project vicinity, the Project would not expose people or property to hazards resulting from past or present mining activities, nor would the Project be an incompatible use with any proposed or existing surface mines. As such, no impacts would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

NOISE Would the project result in:

26. Airport Noise

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

☐	☐	☐	☒
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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?

☐	☐	☐	☒
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Source(s): Riverside County General Plan Figure S-20 "Airport Locations" (Riverside County, 2020a); Riverside County Information Technology – Map My County (RCIT, 2023); Google Earth Pro (Google Earth, 2023), Noise Impact Analysis (Vista Environmental, 2025a)

Findings of Fact:

- a) The proposed project may expose people residing in the project area to excessive noise levels from aircraft. The nearest airport is Riverside Airport that is located as near as 5.8 miles north of the project site. The project site is located outside of the 60 dBA CNEL noise contours of this Airport. Therefore, the proposed homes would not be exposed to excessive aircraft noise. Impacts would be less than significant. (Vista Environmental, 2025a, p.28)
- b) As discussed within Section 26(a) "Airport Noise", above, the project is nor located within the vicinity of a private airstrip exposing people residing or working in the project to excessive noise levels and therefore impact would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

27. Noise Effects by the Project

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in

☐	☐	☒	☐
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	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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”) (Riverside County, 2020a); Project Application Materials; Noise Impact Analysis (Vista Environmental, 2025a)

Findings of Fact:

- a) The proposed project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The following section calculates the potential noise emissions associated with the temporary construction activities and long-term operations of the proposed project and compares the noise levels to the County standards. (Vista Environmental, 2025a, p. 25)

Construction-Related Noise

The construction activities for the proposed project are anticipated to include site preparation and grading of 29 acres of the 36.55-acre project site, building construction of 73 single-family homes, paving of the onsite roads and driveways, sidewalks and hardscapes, and application of architectural coatings. Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. The nearest sensitive receptors to the project site are residents at the ranch homes located as near as 440 feet south of the project site and at the single-family homes located as near as 500 feet northeast of the project site. (Vista Environmental, 2025a, p. 25)

General Plan Policy N 13.1 requires that construction noise impacts to be minimized on adjacent uses through acceptable practices. General Plan Policy N 13.2 requires that construction activities are limited to established hours of operation in order to mitigate the generation of excessive or adverse noise impacts on the surrounding community. The Riverside County Noise Ordinance provides the established hours of construction operations, and details that construction activities that occurs between 6:00 a.m. and 6:00 p.m. during the months of June through September and between 7:00 a.m. and 6:00 p.m. during the months of October through May are exempt from the Noise Ordinance. General Plan Policy N 13.3 requires construction of subdivisions that are adjacent to occupied noise sensitive land uses to submit a construction-related noise mitigation plan to the County that depicts how construction noise will be mitigated through use of temporary noise fences, preferred location of equipment and use of current noise suppression technology and equipment. Project Design Feature 1 has been included in this analysis to ensure compliance with General Plan Policy N 13.3 that requires the County to review and approve a construction-related noise mitigation plan, prior to issuance of the grading permit for the proposed project. General Plan Policy 13.4 requires that all construction equipment utilize noise reduction features (e.g. mufflers and engine shrouds) that are no less effectively than what was originally installed by the manufacturer. As detailed above, through implementation of Project Design Feature 1, construction of the proposed project would not exceed the applicable standards in the General Plan and Ordinance. (Vista Environmental, 2025a, p. 25-26)

However, the County construction noise standards do not provide any limits to the noise levels that may be created from construction activities and even with adherence to the County standards, the resultant construction noise levels may result in a significant substantial temporary noise increase to the nearby residents. In order to determine if the proposed construction activities would create a significant substantial temporary noise increase, the FTA construction noise criteria thresholds detailed have been utilized, which shows that a significant construction noise impact would occur if construction noise exceeds 80 dBA during the daytime at any of the nearby homes. (Vista Environmental, 2025a, p. 26)

Construction noise levels to the nearby homes have been calculated through use of the RCNM and the parameters and assumptions detailed for Construction Equipment Noise Emissions and Usage Factors. The results are shown below in Table 27.1:

Table 27.1 – Construction Noise Levels at the Nearby Homes

Construction Phase	Construction Noise Level (dBA Leq) at Nearest:	
	Ranch Homes South of Project Site ¹	Single Family Homes Northeast of Project Site ²
Site Preparation	63	59
Grading	64	61
Building Construction	63	60
Paving	57	54
Painting	49	46
FTA Construction Noise Threshold³	80	80
Exceed Thresholds?	No	No

¹ The nearest ranch homes south of the project site are located as near as 840 feet from the center of the project site.

² The nearest single-family homes northeast of the project site are located as near as 1,240 feet from the center of the project site.

³ These phases include blasting that was analyzed based on the shortest distance from where blasting will likely occur to the nearby homes

⁴ The FTA Construction noise thresholds for Residential Land Uses

Source: RCNM, Federal Highway Administration, 2006

Table 27.1 shows that the greatest noise impacts would occur during the grading phase with a noise level as high as 64 dBA Leq at the nearest ranch homes south of the project site and 61 dBA Leq at the nearest single-family homes northeast of the project site. All calculated construction noise levels shown in Table 27.1 are within the FTA daytime construction noise standard of 80 dBA averaged over eight hours. Therefore, through adherence to the allowable construction times detailed in the Riverside County Noise Ordinance and through implementation of Project Design Feature 1, that requires the preparation of a construction-related noise mitigation plan, prior to the issuance of the grading plan for the proposed project, the proposed project would not create a substantial temporary increase in ambient noise levels from construction of the proposed project. Impacts would be less than significant. (Vista Environmental, 2025a, p. 26)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Operational-Related Noise

The proposed project would consist of the development of 73 single-family detached homes. Potential noise impacts associated with the operations of the proposed project would be from project-generated vehicular traffic on the nearby roadways and from onsite noise sources that are typical of single-family home developments (i.e, air conditioning equipment and landscaping maintenance activities). Operational noise associated with the proposed single-family residential development would primarily result from typical residential activities, such as vehicle trips, landscaping maintenance, and use of heating and air conditioning systems. These sources are consistent with those commonly associated with suburban residential neighborhoods and are not expected to generate substantial increases in ambient noise levels. Noise generated by project operations would be intermittent and localized, and would not exceed the applicable noise standards established by the Riverside County General Plan Noise Element or Noise Ordinance. It should also be noted that these onsite noise sources would not be noticeable at the nearest offsite sensitive receptors that are located over 400 feet away from the project site. Since, the proposed homes would be located over 900 feet away from El Sobrante Road, which is the nearest major roadway to the project site, the proposed homes would not be exposed to excessive roadway noise level impacts that exceed the County noise standards for placement of new homes. (Vista Environmental, 2025a, p.26-27)

Operational Roadway Noise Impacts to Nearby Homes

Neither the General Plan nor the Ordinances defines what constitutes a “substantial permanent increase in ambient noise levels” from project-related roadway noise increases. As such, this impact analysis has utilized guidance from the Federal Transit Administration for a moderate impact that shows that the project contribution to the noise environment can range between 0 and 7 dBA, which is dependent on the existing roadway noise levels. (Vista Environmental, 20025a, p.27)

Due to the small size of the project, a full traffic analysis has not been prepared for the proposed project. Access to the proposed project will utilize the same proposed access road to El Sobrante Road as TTM No. 38605, which prepared a full traffic analysis. The *Noise Impact Analysis Greentree TTM NO. 38605 Residential Project*, prepared by Vista Environmental, August 23, 2024, analyzed the roadway noise impacts to the nearby homes from the generation of 1,538 daily vehicle trips from 163 single-family homes and found the greatest road noise impact of a 0.5 dBA noise increase would occur on El Sobrante Road, west of the access road, which was found to be below the +1 dBA increase threshold for this road segment. (Vista Environmental, 2025a, p.27)

Based on the same project trip generation rate utilized for TTM No. 38605 of 9.43 daily trips per single-family home the proposed 73 single family homes would generate 689 daily trips, which is less than half of the daily trips generated by TTM No. 38605, which would result in a noise increase of around 0.2 dbA (less than half of 0.5 dBA) on El Sobrante Road, west of the access road, which would be well below the +1 dBA increase threshold for this road segment. As such, operational roadway noise impacts from the proposed project would result in a less than significant impact. Therefore, the proposed project would not create a substantial permanent increase in ambient noise levels from on-going operations of the proposed project. Impacts would be less than significant. (Vista Environmental, 2025a, p.27)

- b) The following section analyzes the potential vibration impacts associated with the construction and operations of the proposed project.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Construction-Related Vibration Impacts

The construction activities for the proposed project are anticipated to include site preparation and grading of 29 acres of the 36.55-acre project site, building construction of 73 single-family homes, paving of the onsite roads and driveways, sidewalks and hardscapes, and application of architectural coatings. Vibration impacts from construction activities associated with the proposed project would typically be created from the operation of heavy off-road equipment and from blasting activities. The nearest sensitive receptors to the project site are residents at the ranch homes located as near as 440 feet south of the project site. (Vista Environmental, 2025a, p. 27)

Since neither the Ordinances nor the General Plan provide a quantifiable vibration threshold for temporary construction activities, guidance from the Transportation and Construction-Induced Vibration Guidance Manual, prepared by Caltrans, April 2020, has been utilized, which defines the threshold of perception from transient sources such as off-road construction equipment at 0.25 inch per second peak particle velocity (PPV). (Vista Environmental, 2025a, p. 28)

The primary source of off-road equipment vibration during typical construction activities would be from the operation of a bulldozer. From Table G above a large bulldozer would create a vibration level of 0.089 inch per second PPV at 25 feet. Based on typical propagation rates, the vibration level at the nearest home to construction activities (440 feet away) would be 0.004 inch per second PPV. The vibration level at the nearest home would be below the 0.25 inch per second PPV threshold detailed above. Off-road equipment vibration impacts would be less than significant. (Vista Environmental, 2025a, p. 28)

The project applicant has stated that limited blasting may be required to remove rock outcroppings on the project site. According to Figure 6 from the Transportation and Construction-Induced Vibration Guidance Manual, prepared by Caltrans, April 2020 (see Figure 6, above), at 440 feet away from blasting the vibration level would range between 0.002 and 0.04 inch per second PPV. The vibration level at the nearest home would be below the 0.25 inch per second PPV threshold detailed above. In addition, all blasting activities would be required to adhere to all applicable regulations, including Title 8 Section 5291 of the California Code of Regulations that requires the blaster to be licensed as well as provides the procedures to be followed before, during and after a blasting event to ensure safety as well as minimize blasting impacts to the nearby homes. For these reasons, blasting vibration impacts would be less than significant. (Vista Environmental, 2025a, p. 28)

Operations-Related Vibration Impacts

The proposed project would consist of the development of a residential community with 73 single-family detached homes. The on-going operation of the proposed project would not include the operation of any known vibration sources other than typical onsite vehicle operations for a residential development. Therefore, a less than significant vibration impact is anticipated from operation of the proposed project. (Vista Environmental, 2025a, p. 28)

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

PALEONTOLOGICAL RESOURCES:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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28. Paleontological Resources

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

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Source(s): Riverside County General Plan Figure OS-8 “Paleontological Sensitivity” (Riverside County, 2020a); Riverside County Information Technology – Map My County (RCIT, 2023)

Findings of Fact:

- a) According to the Riverside County Land Information System, the Project site has “Low Potential” to yield nonrenewable paleontological resources. Furthermore, Holocene alluvial deposits in stream bottoms and along dry washes across the property are geologically too young to contain paleontological resources. Based on the foregoing, the Project would not directly nor indirectly destroy a unique paleontological resource, or site, or unique geologic feature; therefore, impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

POPULATION AND HOUSING Would the project:

29. Housing

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

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

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- c) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County’s median income?

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Source(s): Riverside County General Plan Housing Element (Riverside County, 2020a); Riverside County Information Technology – Map My County (RCIT, 2023); Project Application Materials

Findings of Fact:

- a) Implementation of the Project would provide 73 residential units which would potentially result in the addition of up to 244 new residents to the area. Additionally, the Project would install infrastructural improvements such as paved roads and access to improved and expanded water and sewer lines which could indirectly induce growth in the local area. However, off-site improvements would merely upgrade existing facilities as needed to support development of the site, and would not accommodate any new growth in the area beyond what is already accommodated by existing facilities. Additionally, the majority of surrounding properties are either entitled for development or under construction, and there is no component of the project that would increase the rate of development on surrounding lands. Thus, the potential for the Project to induce substantial population growth would be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- b) Under existing conditions, no housing units are located on the Project site. As such, implementation of the proposed Project would not displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere. Additionally, development of the proposed Project would increase the number of available housing units in Riverside County. Accordingly, no impact would occur.
- c) The Project proposes to develop the site with 36.55 acres of residential land uses and 9.67 acres of recreational land uses. The Project would provide new housing opportunities to the region and would not generate any demand for new affordable housing within the County. Additionally, the Project does not propose land uses that would generate employment (i.e., schools, commercial buildings, etc.) that would result in an increased demand for affordable housing. Implementation of the proposed Project would create 73 additional residential units in Riverside County, which would help meet housing demands for Riverside County. Accordingly, no impact would occur.

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:

30. Fire Services

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Source(s): Riverside County General Plan Safety Element (Riverside County, 2020a); Riverside County General Plan EIR No. 441 – Public Facilities (Riverside County, 2020b)

Findings of Fact:

The Project's proposal to develop 73 single-family residential homes, recreational areas, and open space would place additional demand on the County Fire Department and would cumulatively affect the Department's ability to service the planned population. The Project would require an "Urban-Category III" level of service as defined by the Riverside County Fire Protection Master Plan. This classification requires a fire station be within three roadway miles of the Project site, and a full first alarm assignment team operating on the scene within 15 minutes of dispatch. The primary station serving the Project area (Station 82, Lake Hills) is located approximately 3.0 roadway miles from the Project site (Google Earth, 2023). Based on the travel distance between the Project site and Station 82, the first unit should arrive at the proposed Project site within approximately eight minutes after dispatch. The estimated response time is approximate but demonstrates that the RCFD would be able to meet the Urban-Category III Land Use protection goals of the Fire Protection Master Plan for the Project.

As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, state, and federal laws, ordinances, and standards relating to fire safety. Among other items, these

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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requirements include conformance with the Uniform Building Code Section 1503, which requires that all buildings be constructed with fire retardant roofing material, as well as standard Riverside County Fire Department conditions of approval (COAs) for specific plans, which prohibit flag lots and require alternative/secondary access routes to neighborhoods. The alternative/secondary access routes would be required to be maintained throughout construction and buildout of the Project.

The Project site is located in the State Responsibility Area “High Fire Hazard Severity Zone.” As a condition of Project approval, the Project would also be required to conform to the special construction provisions contained in Riverside County Ordinance 787.8, Title 14, the California Building Code, California Fire Code, Riverside County Land Division Ordinance, and Riverside County Fire Department Information Bulletin #08-05 Fuel Modification Standard. As part of the Project’s conditions of approval, plans would be required to be submitted for the Fire Department for review and approval prior to building permit issuance in order to demonstrate compliance with the applicable construction provisions.

Development of the proposed Project would impact fire services by placing an additional demand on existing County Fire Department resources and personnel. In accordance with the Riverside County Fire Protection Master Plan, a new fire station and/or appropriate fire company is required for the development of 2,000 dwelling units or more. The Project proposes the development of 73 dwelling units and recreational areas, and open space; therefore, the proposed Project would not directly result in the need for any new fire stations. However, the proposed Project would impact the fire department’s ability to provide an adequate level of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, traffic, and population. The Project is required to adhere to Riverside County Ordinance No. 659, which requires payment of a DIF to assist the County in providing for fire protection facilities, including fire stations. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and fire station construction. Accordingly, Project-related impacts to fire protection services are evaluated as less than significant and no mitigation beyond payment of DIF fees would be required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

31. Sheriff Services

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Source(s): Riverside County General Plan (Riverside County, 2020a); Riverside County General Plan EIR No. 441 – Public Facilities (Riverside County, 2020b)

Findings of Fact:

The Project would result in an approximate population increase of 244 residents. The incremental increase in population to the region could result in an incremental increase in criminal activity such as burglaries, thefts, auto thefts, vandalism, etc. However, according to the Riverside Sheriff’s Department, there is not a direct correlation between population growth, the number of crimes committed, and the number of Sheriff’s Department personnel needed to respond to these increases. As the population and use of an area increases, however, additional financing of equipment and manpower needs are required to meet

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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the increased demand. The proposed Project would result in an increase in the cumulative demand for services from the Riverside Sheriff's Department.

Riverside County has set a minimum standard of 1 deputy per 1,000 people. This standard was adopted as part of the "Commitment to Public Safety and Citizens' Option for Public Safety," by the Board of Supervisors on September 17, 1996. The Sheriff's Department has indicated that their desired staffing level is 1.2 deputies per 1,000 people. Additionally, Mitigation Measure 4.15.C of EIR No. 441 states that Riverside County shall meet and maintain a goal of 1.5 sworn peace officers per 1,000 population.

In order to maintain the desirable level of service established by EIR No. 441 Mitigation Measure 4.15.C, build-out of the proposed Project would generate a need for approximately one (1) additional sworn peace officers (244 total residents $\times$ 1.5 sworn peace officers/1,000 persons = 0.4 sworn peace officers), and one (1) additional patrol car. Staff necessary to support the additional deputies would include an appropriate level of civilian, investigation, and supervisory personnel. The proposed Project would not, however, in and of itself result in the need for new or expanded sheriff facilities.

The Project's impact to sheriff protection services would not be regarded as significant on a direct basis because the Project would not create the need to construct a new Sheriff station or physically alter an existing station to accommodate the additional personnel. However, the Project would be required to comply with Riverside County Ordinance No. 659, which requires a DIF payment to the County for impacts to public services and facilities, including sheriff facilities and services. Payment of the DIF fee would ensure that funds are available for either the purchase of new equipment and/or the hiring of additional sheriff personnel to maintain the County's desired level of service for sheriff protection.

In addition, implementation of a Neighborhood Watch Program between the Project's Home Owner Association and the Sheriff's Department, as would occur through the County's implementation of EIR No. 441 Mitigation Measure 4.15.2B, would further reduce impacts on sheriff resources.

Therefore, implementation of the Project would not result in the need for new or expanded sheriff facilities, and impacts would be less than significant. The Project's incremental demand for sheriff protection services also would be less than significant because the Project would be required to contribute DIF fees. Accordingly, a less-than-significant impact would occur with respect to sheriff protection services or facilities as a result of implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

32. Schools

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Source(s): Riverside County Information Technology – Map My County (RCIT, 2023); Riverside County General Plan (Riverside County, 2020a); Riverside County General Plan EIR No. 441 – Public Facilities (Riverside County, 2020b)

Findings of Fact:

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The Project proposes to develop the site with 73 single-family residences. The Project would be required to contribute fees to the RUSD in accordance with Public Education Code § 17072.10-18. Pursuant to the Leroy F. Greene School Facilities Act of 1998, payment of school impact fees constitutes full and complete mitigation for project-related impacts to school services. Accordingly, Project impacts to school services would not occur and no mitigation beyond payment of fees would be required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

33. Libraries

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Source(s): Riverside County General Plan (Riverside County, 2020a); Riverside County General Plan EIR No. 441 – Public Facilities (Riverside County, 2020b)

Findings of Fact:

Development of the Project would increase the region's population, creating an additional demand for library facilities and services. Upon development of the site, the site would consist of single-family residential land uses, recreational area, and open space, which would result in an increase in the area's population by approximately 244 new residents.

Although use of the internet has resulted in decreased demand being placed on library services nationwide, the County continues to maintain its standards for book titles and library square footage. To attain the level of service standard specified in the County's General Plan and EIR No. 441 of 0.5 square feet (s.f.) of library space and 2.5 titles per capita, the Project-generated population would require an additional 122 s.f. of library space and 610 book titles. (Riverside County, 2020b)

Although the Project ultimately would contribute to the need for expanded library space, the provision of such additional library space would be addressed through the County's compliance with EIR No. 441 Mitigation Measure 4.15.6.A. The Project would contribute funding towards the cost of new facilities through property taxes and payment of fees pursuant to Riverside County Ordinance No. 659. Although new library facilities could be considered for construction in the Lake Matthews/Woodcrest area, it is not possible to identify environmental impacts that may be associated with the construction of new or expanded library facilities until a specific proposal and design for the facility is prepared by Riverside County and/or the RCPLS. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation in this Initial Study. Environmental effects of such library facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded library facilities. Any mitigation measures required for new or expanded library facilities could be funded, in part, from property taxes and/or DIF fees allocated by Riverside County to such purposes. As such, Project impacts to library facilities and resources are evaluated as 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
34. Health Services	☐	☐	☒	☐

Source(s): Riverside County General Plan (Riverside County, 2020a); Riverside County General Plan EIR No. 441 – Public Facilities (Riverside County, 2020b)

Findings of Fact:

The nearest medical facility to the Project site is Kaiser Permanente Riverside Medical Center, located approximately 3.5 miles northwest of the Project site at 10800 Magnolia Avenue in the City of Riverside. The Project would introduce approximately 244 new residents to the area. According to Section 4.17, Public Facilities, of EIR No. 441, a population of 1,000 persons generates the need for 1.9 hospital beds (Riverside County, 2020b). Using the 1.9 hospital beds per 1,000 persons generation factor, the Project would generate the need for approximately two (2) additional hospital beds ($244 \text{ residents} \times 1.9 \text{ hospital beds} / 1,000 \text{ residents} = 0.5 \text{ hospital beds}$). The Project would remain consistent with the total amount of units and unit densities allowed on the site under the existing General Plan land use designations; therefore, medical needs accommodated by the General Plan would be sufficient for the Project site.

The provision of private health care is largely based on economic factors and demand and is beyond the scope of analysis required for Initial Study. EIR No. 441 concluded impacts associated with buildout of the General Plan would be less than significant, and further notes that: “compliance with...existing General Plan policy and existing Mitigation Measures 4.15.7A and 4.15.7B from EIR No. 441, would further reduce or avoid the insignificant impacts...” (Riverside County, 2020b). Mitigation Measure 4.15.7A requires the County to perform periodic medical needs assessments to evaluate the current medical demand and level of medical service provided within each Area Plan every three years. Mitigation Measure 4.15.7B requires the County to fund the new construction and/or expansion of existing medical facilities according to the level of demand for medical services based on the needs assessment required as part of Mitigation Measure 4.15.7A. Furthermore, mandatory compliance with County Ordinance No. 659 requires a development impact fee payment to the County that is partially allocated to public health services and facilities. As such, impacts to public medical facilities and resources associated with the proposed Project would 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
RECREATION Would the project:				
35. Parks and Recreation	☐	☐	☒	☐
a) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	☐	☐	☒	☐

Source(s): Ord. No. 460, Section 10.35 (Regulating the Division of Land – Park and Recreation Fees and Dedications) (Riverside County, 2023); Ord. No. 659 (Establishing Development Impact Fees) (Riverside County, 2023); Riverside County Information Technology – Map My County (RCIT, 2023); Riverside County Ordinance No. 460, Section 10.35 (Regulating the Division of Land – Park and Recreation Fees and Dedications) (Riverside County, 2023); Project Materials

Findings of Fact:

- a) The Project would generate a future population of approximately 244 persons. According to Riverside County Ordinance No. 460, a minimum of 3.0 acres of parkland is required for each 1,000 residents of the County. Therefore, the Project would generate a demand for approximately 0.73 acres of parkland (244 persons x 3.0 acres/1,000 persons = 0.73 acres) to meet the recreational demands of the Project's future residents.

The Project proposes a community park within 0.73 acres. Thus, recreational facilities proposed by the Project would exceed the requirement to provide 0.73 acres of recreational use on site, pursuant to County Ordinance No. 460. Accordingly, the Project would comply with the parkland requirements of Ordinance No. 460. Additionally, the park would be available to all residents of public and would not be restricted only to residents of the Project.

Impacts due to the physical construction of on-site recreational facilities has been addressed under the relevant issue areas identified throughout this Initial Study (i.e., air quality, biological resources, cultural resources, etc.). Under each of these subsections, the Project's impacts were determined to be less than significant, or mitigation measures were imposed to reduce impacts to below a level of significance. There are no components of the planned recreation facilities on-site that have not already been addressed within this Initial Study. Accordingly, Project impacts due to construction of recreational facilities on-site would be less than significant.

- b) In addition, because the Project would exceed the parkland demand of Ordinance No. 460, it is reasonable to conclude that future Project residents would not substantially contribute to the physical deterioration or accelerated deterioration of existing parks within the Project's vicinity. Accordingly, the Project would not include the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and impacts would be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- c) According to Riverside County GIS, the Project site is not located within a CSA (RCIT, 2023). The Project site also is not located within any adopted Community Parks and Recreation Plan. Park land requirements for the proposed Project would be governed by Riverside County Ordinance No. 460, which allows for the dedication of park land in lieu or the payment of park land fees (i.e., Quimby Fees). As described above under the discussion of Thresholds a. and b., the Project would exceed the parkland dedication requirements set forth by Ordinance No. 460. Accordingly, the Project would accommodate adequate areas of active recreational uses on-site, and in-lieu fees (Quimby fees) would not be required. A less than significant would occur and mitigation would not be necessary.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

36. 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 (Riverside County 2020a); Lake Mathews / Woodcrest Area Plan, Figure 8 (Riverside County, 2020c); Project Application Materials

Findings of Fact:

- a) The According to the Lake Mathews/ Woodcrest Area Plan Trails and Bikeway System map (Figure 8), there is a combination trail (regional trail/Class I bike path) that runs along the south side of El Sobrante Road. However, the proposed project does not include the construction or expansion of a trail system, nor would it interfere with the combination trail along the south side of El Sobrante Road. Therefore, no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

TRANSPORTATION Would the project:				
37. Transportation	☐	☒	☐	☐
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Cause an effect upon, or a need for new or altered maintenance of roads?	☐	☐	☒	☐
e) Cause an effect upon circulation during the project's construction?	☐	☐	☒	☐
f) Result in inadequate emergency access or access to nearby uses?	☐	☐	☒	☐

Source(s): Riverside County General Plan; Project Application Materials; Greentree (TTM No. 39011) Traffic Analysis (Urban, 2025a); Riverside County Information Technology – Map My County (RCIT, 2023)

Findings of Fact:

- a) The analysis of the Project to conflict with a program, plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle, and pedestrian facilities, focuses on potential impacts to local roadway intersections and roadway segments, based on acceptable standards established by the County of Riverside and City of Riverside. The analysis in this section also includes an evaluation of potential impacts to CMP facilities under the jurisdiction of Caltrans, which include potential impacts to ramp junctions with SR-91. Traffic during the Project's construction phase is not analyzed herein because based on the construction characteristics, the volume of construction-related traffic would result in fewer peak hour and daily trips than would result from operation of either phase of the Project; thus, the analyses of the Project's operational traffic covers any impacts that could occur from construction-related traffic.

Analysis Scenarios

For the purposes of this traffic study, potential deficiencies to traffic and circulation have been assessed for each of the following conditions:

- Existing (2025) Conditions
- Existing plus Ambient Growth plus Project (EAP) (2027) Conditions
- Existing plus Ambient Growth plus Project plus Cumulative (EAPC) (2027) Conditions

Existing (2025) Conditions

The intersection level of service analysis is based on the traffic volumes observed during the peak hour conditions using traffic count data collected on Tuesday, February 25, 2025 at the intersection of McAllister Street at El Sobrante Road. Traffic counts at McAllister Street and El Sobrante Road serve as a baseline for Existing (2025) conditions for the study area intersection which was not open at the time the counts were collected. The eastbound and westbound through volumes calculated from the intersection of McAllister Street and El Sobrante Road have been applied to the analysis of the study area intersection under all future traffic conditions. The following peak hours were selected for analysis:

- Weekday AM Peak Hour (peak hour between 7:00 AM and 9:00 AM)
- Weekday PM Peak Hour (peak hour between 4:00 PM and 6:00 PM)

EAP (2027) Conditions

EAP (2027) (Project Only)

Existing plus Ambient Growth plus Project (EAP) (2027) traffic volumes are based on the manual addition of existing volumes, an ambient growth factor of 4.04% (2 percent per year, compounded over 2 years), and Project traffic.

EAP (2027) (Project + Others)

This scenario includes existing volumes, an ambient growth factor of 4.04% (2 percent per year, compounded over 2 years), the addition of Project traffic, and the addition of traffic from the Highland Grove II, Greentree, and Highland Grove IV developments as all of these tracts would utilize the same access points and would need to contribute their equitable share towards improvements (referred to as Others).

Table 37.1 provides a summary of the intersection operations analysis for EAP (2027) traffic conditions. As shown, the study area intersection is anticipated to operate at an acceptable LOS during the peak hours under EAP (2027) (Project Only) and EAP (2027) (Project + Others) traffic conditions. (Urban, 2025a, p.9)

Table 37.1 EAP (2027) Intersection Analysis

#	Intersection	Traffic Control ²	EAP (2027) – Project Only				EAP (2027) – Project + Others ³			
			Delay ¹ (secs.)		Level of Service		Delay ¹ (secs.)		Level of Service	
			AM	PM	AM	PM	AM	PM	AM	PM
1	Street A & El Sobrante Road	CSS	13.5	11.4	B	B	28.3	18.2	D	C

² CSS = Cross-street Stop; CSS = Improvement

EAP (2027) Traffic Signal Warrants

The traffic signal warrant analysis for EAP (2027) traffic conditions is based on the planning level ADT volume-based traffic signal warrants. The intersection of Street A at El Sobrante Road is not anticipated to meet an ADT volume-based warrant under EAP (2027) (Project Only) conditions.

With the addition of Highland Grove II, Greentree, and Highland Grove IV development traffic, the study area intersection of Street A at El Sobrante Road is anticipated to meet an ADT volume-based traffic signal warrant under EAP (2027) (Project + Others) conditions. (Urban, 2025a, p.10)

EAPC (2027) Conditions

Existing plus Ambient Growth plus Project plus Cumulative (EAPC) (2027) traffic volumes are based on the manual addition of existing volumes, an ambient growth factor of 4.04% (2 percent per year, compounded over 2 years), Project traffic, and traffic generated by known cumulative development projects. Cumulative development projects include the Highland Grove II, Greentree, and Highland Grove IV developments.

A cumulative project list was developed for the purposes of this analysis through consultation with planning and engineering staff from the County of Riverside and the City of Riverside. The cumulative project list includes known and foreseeable projects that are anticipated to contribute traffic to the study area intersection. (Urban, 2025a, p.13)

Table 37.2 provides a summary of the intersection operations analysis for EAPC (2027) traffic conditions. As shown, the study area intersection is anticipated to operate at an acceptable LOS during the peak hours under EAPC (2027) traffic conditions. (Urban, 2025a, p.13)

Table 37.2 EAPC (2027) Intersection Analysis

#	Intersection	Traffic Control ²	EAPC (2027)			
			Delay ¹ (secs.)		Level of Service	
			AM	PM	AM	PM
1	Street A & El Sobrante Road	<u>CSS</u>	28.9	18.7	D	C

CSS = Cross-street Stop; CSS = Improvement

EAPC (2027) Traffic Signal Warrants

The study area intersection of Street A at El Sobrante Road is anticipated to meet a traffic signal warrant under EAP (2027) (Project + Others) conditions. As such, traffic signal warrants have not been evaluated for the EAPC (2027) traffic condition.

On-Site Circulation Recommendations

The following recommendations are based on the minimum improvements needed to accommodate site access and maintain acceptable peak hour LOS at site access and on-site operations.

Recommendation 1 – Street A & El Sobrante Road – The following improvements are necessary to accommodate site access (Urban, 2025a, p. 15):

- Project to install a stop control on the southbound approach (Street A) to implement a cross-street stop- controlled intersection and construct a shared left-right turn lane.
- Project to construct an eastbound left turn lane with a minimum of 100-feet of storage.
- Project to construct a westbound right turn lane with a minimum of 100-feet of storage.

Recommendation 2 – Street A is a north-south oriented roadway located south of the Project site, providing primary Project access to El Sobrante Road. Project to construct Street A at its ultimate full-section width as a Local roadway (60-foot right-of-way), from El Sobrante Road to the Project's northern boundary, consistent with the County's standards. (Urban, 2025a, p. 15)

On-site traffic signing and striping should be implemented agreeable with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD) and in conjunction with detailed construction plans for the Project site. (Urban, 2025a, p. 15)

Sight distance at each project access point should be reviewed with respect to standard Caltrans and County of Riverside sight distance standards at the time of preparation of final grading, landscape, and street improvement plans. (Urban, 2025a, p. 15)

Therefore, with the implementation of **Mitigation Measures TRA-1** by incorporating the recommendations within the traffic analysis, any conflict with a program, plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle, and pedestrian facilities would be mitigated and the impacts would be less than significant.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- b) 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 assessment prepared for the Project identified that the Project falls within the VMT screening criteria “Small Projects” because the Project does not exceed the threshold for Annual Greenhouse Gas Emissions (Less than 110 dwelling units). Therefore, this project will screen out from a VMT analysis, and is therefore consistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts will be less than significant.
- c) The Project proposes a network of internal roadways that would be constructed within the Project site. During the County’s review process for the Project’s proposed Tentative Tract Map, the County of Riverside reviewed the proposed design plans to ensure that no hazardous roadway features would be implemented. The proposed community would not include any components that would result in incompatible uses on roadways, including heavy equipment, etc. Accordingly, the proposed Project would not create or substantially increase safety hazards due to a design feature or incompatible use. Impacts associated with this issue would be less than significant.
- d) Implementation of the proposed Project would result in the establishment of several new roadways within the Project site; however, including a connection between the southern community entry and El Sobrante Road. Thus, with implementation of the Project, Riverside County would be responsible for maintaining the on-site streets and the connection between the southern community entry and El Sobrante Road. Maintenance of these facilities would be funded through the Project Applicant’s payment of DIF fees and future Project residents’ payment of property taxes, while maintenance of roadway landscape planned on site would be the combined responsibility of the individual Homeowners along their fronts, the Project’s Homeowners’ Association (HOA) where deemed appropriate or a Project Specific Community Facilities District (CFD) where the County would elect to assume responsibility. Therefore, the maintenance of roadways proposed by the Project would not deplete the County’s general fund to the extent that programs protecting the environment cannot be funded, and impacts would be less than significant.
- e) During the Project’s construction phase and based on the Project description, the volume of construction-related traffic would result in fewer peak hour and daily trips than would result from the operation of the Project, as traffic only would be associated with construction workers arriving and leaving, and construction materials delivery. Additionally, there are no improved roadways on the Project site under existing conditions. The Project would construct a new roadway connecting the Project site to El Sobrante Road. These improvements could temporarily disrupt traffic on these roadways; however, any construction-related traffic impacts resulting from the Project would be addressed through the requirement to comply with a temporary traffic control plan that meets the applicable requirements of the California Manual on Uniform Traffic Control Devices. Accordingly impacts during construction are to be less than significant.
- f) The Project proposes a network of internal roadways that would be constructed within the Project site. During Riverside County’s review of the Project’s proposed Tentative Tract Map, the County reviewed the proposed design plans to ensure that adequate emergency access would be available at the site.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Accordingly, the proposed Project would not result in inadequate emergency access during long-term operation of the Project. Impacts associated with this issue would be less than significant.

Due to temporary lane closures that may occur during the Project's construction phase, Project-related construction activities may conflict with emergency access routes and access to nearby uses during construction. Project-related construction traffic would be required to comply with a temporary traffic control plan that meets the applicable requirements of the California Manual on Uniform Traffic Control Devices. With the requirement to implement a temporary traffic control plan reviewed and approved by the County of Riverside Transportation Department a less than significant impact is identified.

Mitigation: The following **TRA Mitigation Measures** are required:

TRA-1

The following improvements shall be constructed or installed at the intersection of Street A & El Sobrante Road:

- Project to install a stop control on the southbound approach (Street A) to implement a cross-street stop- controlled intersection and construct a shared left-right turn lane.
- Project to construct an eastbound left turn lane with a minimum of 100-feet of storage.
- Project to construct a westbound right turn lane with a minimum of 100-feet of storage.

Monitoring:

Street Improvement Plans and Signing and Striping Plans shall be prepared by a licensed Civil Engineer and submitted to the County of Riverside Transportation Department (RCTD) for review and approval. The Street Improvements plans shall be reviewed for compliance with Caltrans Standards, Riverside County Transportation Standards, and CA MUTCD. Improvement Plans shall be reviewed and approved prior to the recordation of the final map. Street Improvements for Street A and the improvements at the intersection of Street A and El Sobrante Road shall be completed prior to the first building occupancy, excluding model home temporary occupancy. Fair share contributions per a cost estimated prepared by licensed Civil Engineer, reviewed and approved by the Riverside County Transportation Department, shall be paid prior to the first building occupancy, excluding model home temporary occupancy.

38. Bike Trails

☐	☐	☐	☒
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- a) Include the construction or expansion of a bike system or bike lanes?

Source(s): Lake Mathews / Woodcrest Area Plan, Figure 8 (Riverside County, 2020c)

Findings of Fact:

- a) There are currently no bike lanes or other multimodal facilities within the proposed project site. Additionally, the proposed project does not include the construction or expansion of a bike system or bike lanes. No impacts would occur.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

TRIBAL CULTURAL RESOURCES Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

39. Tribal Cultural Resources

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

☐ ☒ ☐ ☐

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

☐ ☒ ☐ ☐

Source(s): County Archaeologist; AB52 Tribal Consultation; CA Senate Bill 18 (SB 18, 2004); CA Assembly Bill 52 (AB 52, 2014); Cultural Resources Assessment Update for the Greentree Ranch (Highland Grove 5 Segment) Project (BFSA, 2024a)

Findings of Fact:

- a) Tribal Cultural Resources are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as cultural landscapes or sacred places. The appropriate treatment of tribal cultural resources is determined through consultation with tribes in compliance with Senate Bill 18 and Assembly Bill 52 (AB52).

Senate Bill 18 (SB18)

Senate Bill 18 (SB18) also called the Traditional Tribal Cultural Places bill was signed into law September of 2004 and took effect March 1, 2005. SB 18 refers to PRC §5097.9 and 5097.995 which defines cultural places as: Native American sanctified cemetery place of worship, religious or ceremonial site, or sacred shrine (PRC §5097.9). Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historic Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC §5097.993). SB 18 established responsibilities for local governments to contact, provide notice to, refer plans to, and consult with California Native American Tribes that have been identified by the NAHC and if that tribe requests

consultation after local government outreach as stipulated in Government Code (GC) §65352.3. The purpose of this consultation process is to protect the identity of the cultural place and to develop appropriate and dignified treatment of the cultural place in any subsequent project. The consultation is required whenever a general plan, specific plan, or open space designation is proposed for adoption or to be amended. In addition to the requirements stipulated above, SB 18 amended GC §65560 to “allow the protection of cultural places in open space element of the general plan” and amended Civil Code §815.3 to add “California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.”

As part of the application process, California Native American Tribes must be given the opportunity to consult with the County for the purpose of preserving, mitigating impacts to, and identifying cultural places located on project land.

Assembly Bill 52 (AB52)

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

In compliance with Senate Bill18 (SB18), Riverside County requested a Sacred Lands File search and a consultation list from the Native American Heritage Commission (“NAHC”) of tribes whose historical extent includes the project area. Based on the list provided by NAHC, project notices were sent on February 26, 2025, to (31) Native American Tribal representatives. SB 18 consultations were requested by the Rincon Band of Luiseno Indians, Pechanga Band of Indians and the Soboba Band of Luiseno Indians. There was no response from Agua Caliente Band of Cahuilla Indians, Cabazon Band of Cahuilla Indians, Cahuilla Band of Indians, Gabrieleno Band of Mission Indians - Kizh Nation, Juaneno Band of Mission Indians Acjachemen Nation – Belardes, Juaneno Band of Mission Indians Acjachemen Nation 84A, La Jolla Band of Luiseno Indians, Los Coyotes Band of Cahuilla and Cupeño Indians, Morongo Band of Mission Indians, Pala Band of Mission Indians, Ramona Band of Cahuilla, Santa Rosa Band of Cahuilla Indians or the Torres-Martinez Desert Cahuilla Indians.

In compliance with Assembly Bill 52 (AB52), notices regarding this project were mailed to all requesting tribes on February 26, 2025. Consultations were requested by the Rincon Band of Luiseno Indians, Pechanga Band of Indians and the Soboba Band of Luiseno Indians. There was no response from Agua Caliente Band of Cahuilla Indians, Cabazon Band of Cahuilla Indians, Cahuilla Band of Indians, Gabrieleno Band of Mission Indians - Kizh Nation, Juaneno Band of Mission Indians Acjachemen Nation – Belardes, Juaneno Band of Mission Indians Acjachemen Nation 84A, La Jolla Band of Luiseno Indians, Los Coyotes Band of Cahuilla and Cupeño Indians, Morongo Band of Mission Indians, Pala Band of Mission Indians, Ramona Band of Cahuilla, Santa Rosa Band of Cahuilla Indians or the Torres-Martinez Desert Cahuilla Indians.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Quechan Indian Tribe of the Fort Yuma Reservation

The Historic Preservation Officer for the Ft. Yuma Quechan Indian Tribe responded in an email dated February 26, 2025. The email stated, “the Historic Preservation Office does not wish to comment on this project. We defer to the local Tribes and support their determinations on this matter”.

Rincon Band of Luiseno Indians

The Rincon Band of Luiseno Indians responded in an emailed letter dated March 11, 2025. The letter stated, “we request AB52 consultation to assess potential impacts to cultural resources. The identified location is within the Traditional Use Area (TUA) of the Luiseño people. As such, the Rincon Band is traditionally and culturally affiliated to the project area. We kindly ask to be provided with copies of existing documents pertaining to the project such as the cultural survey including the archaeological site records, shape files, archaeological record search results, geotechnical report, and the grading plans. Upon receipt and review, the Rincon Band would like to consult on the project in order to learn more about any potential impacts to cultural resources”. Project documents were provided to the tribe on May 26, 2025. Consultation was concluded on October 14, 2025.

Pechanga Band of Indians

The Pechanga Band of Indians responded in an email dated March 07, 2025. The email stated: “The Pechanga Tribe asserts that the Undertaking is a part of ‘Atáaxum (Luiseño) territory, 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 County and other projects within the area. The Tribe hereby informs the County that the Project site is located within a Traditional Cultural Property (TCP). We will provide additional information regarding tribal affiliation and the TCP in our consultation as well as provide more specific, confidential information on potential TCRs that may be impacted by the proposed Project”. Project documents were provided to the tribe on March 07, 2025, March 26, 2025, and May 13, 2025, and August 05, 2025. Meetings were held on March 18, 2025, May 13, 2025, AND May 19, 2025, in which this project was discussed. Pechanga provided specific information regarding a TCR landscape in which the project lies. The tribe voiced concerns regarding the potential for subsurface resources to be found during the grading process and recommends that a Native American monitor be present during any ground disturbing activities. In addition, **Mitigation Measure TCR-01 through TCR-08**, as shown below, were recommended for inclusion into the environmental document. Consultation was concluded on October 14, 2025.

Soboba Band of Luiseno Indians

The Soboba Band of Luiseno Indians responded in emailed letters dated March 26, 2025. The letters stated, “The project area is considered sensitive by the people of Soboba, as there are existing sites in the surrounding areas. An in-house database search 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”. Project documents were provided to the tribe on March 26, 2025, and August 05, 2025. Soboba voiced concerns regarding the potential for subsurface resources to be found during the grading process and recommends that a Native American monitor be present during any ground disturbing activities. In addition, **Mitigation Measure TCR-01 through TCR-08**, as shown below, were recommended for inclusion into the environmental document. Consultation was concluded on October 06, 2025.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Therefore, with the inclusion of the **Mitigation Measure TCR-01 through TCR-08**, as shown below, impacts to tribal cultural resources would be less than significant.

- b) In accordance with both Senate Bill 18 and Assembly Bill 52 California Native American tribes were consulted to determine the presence of a resource supported by substantial evidence to being significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 including a resource to be considered significant to a California Native American Tribe. As discussed within Section 39(a) "Tribal Cultural Resources", above, the appropriate treatment of tribal cultural resources is determined through consultation with tribes. After consultation with above mentioned California Native American Tribes was concluded, it was determined with the inclusion of **Mitigation Measures TCR-01 through TCR-08**, impacts to tribal cultural resources would be less than significant.

Mitigation:

The following **TCR Mitigation Measures** are required:

TCR 01 – CUL. 1 Cultural ECS sheet

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 the presence of environmentally constrained area(s) and the requirements for avoidance of P-33-026657.

TCR 02 – CUL. 2 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, if needed, 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 03 – CUL. 3 Native American Monitor

Prior to the issuance of grading permits, the developer/permit applicant shall enter into agreement(s) with the consulting tribe(s) for the appropriate number of Native American Monitor(s).

In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. In addition, an adequate number of Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of soils in each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. Activities will be documented in Tribal Monitoring Notes which will be required to be submitted to the County Archaeologist prior to grading final inspection.

The developer/permit applicant shall submit a fully executed copy of the agreement(s) to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

TCR 04 – CUL. 4 Temporary fencing

Temporary fencing shall be required for the protection of cultural site(s) 33-026657 during grading activities. Prior to commencement of grading or brushing, the project archaeologist along with tribal monitors shall confirm the site boundaries and determine an adequate buffer for protection of the site(s). The applicant shall direct the installation of fencing under the supervision of the project archaeologist and Native American Monitor. The fencing can be removed only after grading operations have been completed.

TCR 05 – CUL. 5 Artifact Disposition

Prior to Grading Permit Final Inspection:

In the event cultural resources are identified during ground disturbing activities, the landowner(s) shall relinquish ownership of all cultural resources, (with the exception of sacred items, burial goods, and Human Remains) and Provide evidence to the satisfaction of the County Archaeologist that all archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), have been handled through the following methods.

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.

Pre-contact resources-A fully executed reburial agreement with the appropriate culturally affiliated Native American tribe(s) or band(s). This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloguing, nondestructive analysis have been completed on the cultural resources. Details of contents and location of the reburial shall be included in the Phase IV Report. The details of any disposition of artifacts shall be documented in the Phase IV report.

TCR 06 - CUL. 6 Deed Restriction

At the conclusion of all construction activities, the Project proponent and landowner shall record a deed restriction on the avoidance areas (and the reburial location, if used) with the County to restrict development of these areas in the future. Deed restrictions shall not disclose the nature of the avoidance areas. A copy of the deed restriction(s) shall be submitted to the County planning staff as proof of compliance prior to the issuance of certificates of occupancy for the Project.

TCR 07 -CUL. 7 Human Remains

Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage

Commission shall be contacted by the coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant". The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

In addition, CEQA requires the Lead Agency to address any unanticipated cultural resources discoveries during Project construction. Therefore, a condition of approval that dictates the procedures to be followed should any unanticipated cultural resources be identified during ground disturbing activities has been placed on this project.

TCR 08 - CUL. 8 Unanticipated Resources

The developer/permit holder or any successor in interest shall comply with the following for the life of this permit: If during ground disturbance activities, unanticipated cultural resources* and/or Tribal Cultural Resources** are discovered, the following procedures shall be followed: All ground disturbance activities within 100 feet of the discovered cultural resource/Tribal Cultural Resources shall be halted and the Project archaeologist shall contact the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist***, the Native American tribal representative, and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, avoidance, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis.

Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished. * A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other. Tribal Cultural Resources are also considered cultural resources. ** A Tribal Cultural Resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe that are listed, or determined to be eligible for listing, in the national or state register of historical resources, or listed in a local register of historic resources; or resources that the lead agency determines, in its discretion, are tribal cultural resources. *** If not already employed by the project developer, a County approved archaeologist and a Native American Monitor from the consulting tribe(s) shall be employed by the project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

Monitoring:

A Monitor from the appropriate Native American tribe(s) will be retained under contract and will provide for any monitoring during construction deemed necessary as identified during the AB523 Tribal Consultation, any unanticipated finds will be handled in a timely and culturally appropriate manner.

UTILITIES AND SERVICE SYSTEMS Would the project:

40. Water

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?

☐	☐	☒	☐
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	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐

Source(s): Western Municipal Water District – 2015 Urban Water Management Plan (WMWD, 2015); Project Application Materials, Western Municipal Water District – Water and Sewer Availability Letter (WMWD 2025)

Findings of Fact:

- a) The Project proposes a number of improvements to provide potable and non-potable water service to the site. Environmental impacts associated with the construction of these proposed facilities have been evaluated throughout this initial study (e.g., air quality, biological resources, greenhouse gases, noise, etc.), and where impacts have been identified mitigation is proposed, where feasible, to reduce potential impacts to the greatest possible extent. Accordingly, the discussion in the following analysis focuses on whether the proposed Project would result in or require new or expanded water treatment facilities, and whether the Project would result in a need for new or expanded entitlements for water supply.

WMWD is responsible for supplying the region with its potable and non-potable water needs. As discussed in WMWD's UWMP, adequate water supplies are projected to be available to meet estimated water demand until at least the Year 2040 in all types of climate conditions, including normal, dry, and multiple dry-weather years. WMWD forecasts for projected water demand are based on the adopted land use designations contained within the general plans for the respective cities and unincorporated areas of Riverside County contained within the WMWD's service area. Under existing conditions, the Project site is planned for development with up to 73 residential dwelling units by the Riverside County General Plan, and development of the site has therefore been previously assumed by the WMWD in its projects of future water supply and demand. To assess the ultimate effect of the Project's water demands and service needs, the WMWD has prepared a "will serve" letter for the proposed Project. WMWD has determined that adequate water supplies are available to service proposed development.

The "will serve" letter has also determined the project will require the upsizing of an existing offsite water line to increase the capacity an existing 6" water line to a 24" waterline which is needed to serve the proposed project and is shown on current adopted master plan by WMWD. The existing offsite water line will be upsized from the easterly boundary and extend easterly along Blackburn Road, then southerly along Palm Road, then easterly along Darafeev Lane, connecting to the Lockwood tanks site. The Lockwood tank site will provide available water service for the proposed project. The existing water line is owned, operated, and maintained by WMWD, a depiction of the offsite waterline alignment is shown on Figure 1-5. The alignment of the existing waterline to be upsized is located within public right of way containing a publicly travelled road way that does not contain any new impacts evaluated throughout this initial study, and where impacts have been identified mitigation is proposed. Accordingly, impacts due to the need for new or expanded water would be less than significant.

Additionally, although the upsizing of the existing 6" waterline is necessary solely to have the ability to convey additional flow, sufficient water supplies are available to serve the Project and implementation of the Project would not require any new or expanded water entitlements, and the Project also would not require new or expanded water treatment facilities. Accordingly, impacts due to the need for new or expanded water treatment facilities would be less than significant. (WMWD, 2016a, pp. 52-53)

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- b) As discussed above and in WMWD’s UWMP, adequate water supplies are projected to be available to meet estimated water demand until at least the Year 2040 in all types of climate conditions, including normal, dry, and multiple dry-weather years. WMWD forecasts for projected water demand are based on the adopted land use designations contained within the general plans for the respective cities and unincorporated areas of Riverside County contained within the WMWD’s service area. Under existing conditions, the Project site is planned for development with up to 73 residential dwelling units by the Riverside County General Plan, and development of the site has therefore been previously assumed by the WMWD in its projects of future water supply and demand. This has been further evaluated by WMWD through the due diligence process required by WMWD through the application of a “will serve” letter. Through WMWD’s analysis during the due diligence process it has been determined that adequate water supplies are available to service proposed development and sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years and any impacts associated with the proposed project would 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
41. Sewer				
a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?	☐	☐	☒	☐
b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

Source(s): Western Municipal Water District – 2015 Urban Water Management Plan (WMWD, 2015); Project Application Materials, Western Municipal Water District – Water and Sewer Availability Letter (WMWD, 2025); El Sobrante Property Assemblage WMWD Sewer Analysis (Adkan, 2024c)

Findings of Fact:

- a) The Project proposes a number of improvements to provide sewer services to the site. Impacts associated with the construction of the proposed on-site sewer facilities are evaluated throughout this initial study, and mitigation has been provided to reduce such effects to the maximum feasible extent. Therefore, the Project's proposal to construct new sewer facilities would not result in any impacts to the environment that are not already addressed by this Initial Study. Accordingly, the discussion and analysis below focuses on whether the Project would result in or require new or expanded wastewater treatment facilities that could result in significant environmental effects, as well as an analysis of whether WMWD has adequate capacity to serve the Project's projected demand in addition to WMWD's existing commitments.

Wastewater generated by the proposed Project would be treated by the WRCRWTP. The WRCRWTP currently has a total treatment capacity of 8 mgd, and the WMWD currently has capacity rights of 1.93 mgd. The WRCRWTP treated 936 AFY (approximately 835,607 gpd) of wastewater from the WMWD in 2015. Therefore, the remaining existing WMWD capacity of the WRCRWTP is estimated to be approximately 1,064,393 gpd, or 1.06 mgd (equal to the difference between the existing treatment capacity rights of 1.93 mgd and the 835,607 gpd of wastewater treatment at the facility in 2015).

The Project Wastewater Generation, the proposed Project would generate an average of 14,600 gpd of wastewater requiring treatment at the WRCRWTP. In order to convert the average wastewater flows to peak wet weather flows, a WMWF peaking factor of 1.62 was utilized, resulting in a worst- case maximum Project generation of 23,652 gpd of wastewater requiring treatment at the WRCRWTP. Therefore, using the existing available 2015 capacity for WRCRWTP, the treatment plant would have a worst- case remaining available capacity for sewer treatment of approximately 1,040,741 gpd after implementation of the proposed Project (equal to the difference between the existing remaining treatment capacity rights [1.06 mgd] and the maximum peak wastewater demand generated by the Project [23,652 gpd]). Thus, because the existing WMWD capacity entitlements at the WRCRWTP facility are adequate to serve the proposed Project, the Project would not result in or require the need for new or expanded wastewater treatment facilities that could result in significant environmental effects. Furthermore, because traditional sewer facilities are available and the project has the ability to flow via gravity to the treatment facility, septic facilities are not being considered as part of the Project, further contributing to a less than significant impact. (Adkan, 2024c, p. 13)

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- b) As discussed within Section 41(a) "Sewer", above, the Project has resulted 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. Using the existing available 2015 capacity for WRCRWTP, the treatment plant would have a surplus of remaining available capacity for sewer treatment of approximately 1,040,741 gpd after implementation of the proposed Project. Thus, given the remaining available capacity for sewer treatment after implementation of the proposed Project any impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

42. Solid Waste	☐	☐	☒	☐
a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, 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): Project Application Materials; Riverside County General Plan EIR No. 441 – Public Facilities (Riverside County, 2020b); Riverside County Countywide Integrated Waste Management Plan (Riverside County, 1996); Waste Management Will Serve Letter (WM, 2024)

Findings of Fact:

- a) As shown below in Table 42.1, Project Solid Waste Generation, buildout and occupancy of the Project is estimated to produce approximately 29.93 tons of solid waste per year, which represents approximately 0.18 tons per day. Per the Riverside Countywide Integrated Waste Management Plan (CIWMP), up to 50 percent of its solid waste would need to be diverted from area landfills. In conformance with the CIWMP, the Project Applicant is required to work with future contract refuse haulers to implement recycling and waste reduction programs for solid wastes. Solid waste generated by the Project would be transported to one of two (2) local solid waste transfer facilities, the MVTs and/or PTS. At full buildout, waste generated by the Project would represent approximately 0.009 percent of the permitted daily capacity at the MVTs (2,000 tpd) and 0.006 percent of the permitted daily capacity at the PTS (3,000 tpd). Given the estimated volume of solid waste generated by the Project on a daily basis during the buildout condition, it is anticipated that the MVTs and/or the PTS would have sufficient capacity to accept solid waste to be disposed by the proposed Project. As noted above, the CIWMP would require that up to 50 percent of the solid waste be diverted from area landfills, which would further ensure the Project's solid waste generation does not exceed available landfill capacity, thereby having a less than significant impact.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Table 42.1 – Project Solid Waste Generation

Land Use	Units/Acreage	Wastewater Generation Rate	Total Wastewater Generated	Average Solid Waste per Day
Residential	73 DU	0.41 tons/unit/yr	29.93 tons/yr	0.08 tons/day

- b) The proposed Project would be regulated by the RCDWR and would be required to comply with the CIWMP's requirement to divert up to 50 percent of its solid waste from area landfills. In conformance with the CIWMP, the Project Applicant is required to work with future contract refuse haulers to implement recycling and waste reduction programs for solid wastes. Implementation of a waste disposal strategy for the proposed Project would assist Riverside County in achieving the mandated goals of the Integrated Waste Management Act by developing feasible waste programs that encourage source reduction, recycling, and composting. The RCDWR is specifically charged with the responsibility of implementing programs that ensure that unincorporated Riverside County achieves 50% diversion of solid waste from landfill disposal as well as monitoring and reporting unincorporated Riverside County's compliance with CIWMB and AB 939. With mandatory compliance to AB 939, AB 341, and RCDWR's programs and policies, the Project would not result in a significant impact due to noncompliance with regulations related to solid waste. A less-than-significant impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

43. Utilities

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

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

Source(s): Project Application Materials, Utility Service Providers, Riverside County Ordinance No 460 (Riverside County, 2023); Riverside County Ordinance No. 460 (Riverside County, 2023)

Findings of Fact:

- a) Electric service is currently available to the proposed Project site through Southern California Edison, although existing facilities would need to be expanded as necessary to provide service to the Project's planned 73 residential dwelling units. However, several existing transmission lines occur adjacent to the western boundary of the site (along McAllister Road), and adjacent to the northeastern boundary of the site (along Blackburn Road); therefore, the construction of electricity facilities as necessary to serve the

proposed Project would occur within the on-site areas already planned for impact by the Project. Therefore, the construction of electrical facilities necessary to serve the proposed Project would not result in a less than significant impact to the environment.

- b) There are no anticipated capacity restrictions which could limit the ability of the Southern California Gas Company to provide service to the proposed Project. Points of connection to Southern California Gas main lines would be resolved as the proposed Project and other projects planned for the area commence their utility design and interconnection plans. It is anticipated that construction of any off-site natural gas utility connections would occur within existing disturbed public rights-of-way. As such, the construction of these utility connections would not result in a less than significant impact to the environment. Furthermore, the use of natural gas will be prohibited by 2026 California Building Code, and may not be utilized at the time of construction subject to project timing, further reducing any impacts.
- c) Points of connection to AT&T communication facilities would be resolved as the proposed Project and other projects planned for the area commence their utility design and interconnection plans. It is anticipated that any off-site construction of communication utility connections would occur within existing disturbed public rights-of-way. As such, the construction of communication utility connections is evaluated under the appropriate subject headings within this Initial Study. No environmental impacts would occur from the provision of these utilities, as all lines would be installed within the disturbance areas of existing roadway rights-of-way.
- d) The Project would provide street lighting as required by the County in accordance with Ordinance No. 461 (Roadway Standards) and Ordinance No. 460 (Subdivision of the Land). All physical environmental impacts associated with street lighting and maintenance would occur within the boundaries of the Project site and off-site improvement areas, the impacts of which are described throughout this Initial Study. Therefore, no new impacts to the environment would occur, and street lighting would result in a less than significant impact to the environment.
- e) Implementation of the proposed Project would result in the establishment of new public roadways within the Project site that would require maintenance by the County. Maintenance of the public roadways within the proposed Project would not result in any significant impacts to the environment. Impacts associated with the physical construction of these roadways already are evaluated in appropriate sections of this Initial Study, and any identified impacts have been mitigated to the maximum feasible extent. Maintenance of the major roadway facilities within the Project site would be funded through the Project developer's payment of Development Impact Fees (DIF) and future Project residents' payment of property taxes. Therefore, the maintenance of roadways proposed by the Project would not result in any new impacts to the environment beyond that which is already disclosed and mitigated by this Initial Study, and a less-than-significant impact would occur.
- f) Based on the foregoing analysis, impacts associated with the construction or expansion of other governmental or municipal utilities would be less than significant or otherwise mitigated to the maximum feasible extent by this Initial Study. No additional mitigation would be required and impacts would be less than significant.

Mitigation: No mitigation is required.

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

44. Wildfire Impacts

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☒	☐	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☒	☐	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☒	☐	☐

Source(s): Riverside County General Plan Figure S-11 “Wildfire Susceptibility” (Riverside County, 2020a), Riverside County Information Technology – Map My County (RCIT, 2023); Fire Behavior Report Tentative Tract 39011 (Firesafe, 2024); Project Application Materials

Findings of Fact:

- a) The Riverside County Sheriff’s Department, California Highway Patrol, and other cooperating fire service providers such as County of Riverside Fire Dept and Cal Fire have primary responsibility for evacuations. These agencies work together to assess fire behavior and spread, which ultimately influence evacuation decisions. Evacuation routes are generally identified by fire protection and law enforcement personnel, are determined based on the location and extent of the incident and include as many predesignated transportation routes as possible. The Project is served by an existing surrounding circulation system that provides access to the Project Site and facilitates vehicular circulation throughout the project area in accordance with Riverside County standards. Depending on the nature of the emergency requiring evacuation, it is anticipated that the majority of the Project residents would exit the Project area via the existing surrounding roadway circulation system. Project implementation would not impair access to these roadways should an evacuation be required. Furthermore, the project when completed will provide for an additional means of access into the existing community to the North from El Sobrante Road improving the existing modes for emergency evacuation and emergency response.

Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and will improve response routes to the northerly community. Impacts will be less than significant.

- b) State law requires development in State Responsibility Area (SRA) within any fire hazard zone to comply with the WUI (Wildland Urban Interface) codes contained in the California Residential Code (Chapter 3, Section R337), California Building Code (Chapter 7A) and California Fire Code (Chapter 49).

The Project site is located completely in a Moderate Fire Hazard Severity Zone on the current map (adopted in 2007) and mostly in Moderate for the proposed hazard map, circulated for public comment in 2023. All portions of the site are within a hazard zone and required to comply with the WUI codes cited above.

A fire behavior analysis was completed by Firesafe Planning Solutions predicting wildland fire behavior. The fire behavior analysis includes the analysis of Fuels, Slope Height, Slope Ration, Slope Aspect, Wind Patterns and Weather Inputs. Based on the fire behavior analysis on a “worst-case” scenario the maximum flame length of 40 (39.4) feet is possible at the head of the fire when the fire is running directly upslope with a continuous fuel bed that is consistent enough to produce a self-sustaining, self-propagating fire. (Firesafe, 2024, p. 27)

The Public Resources Code (PRC) Section requires all areas with the development have a minimum defensible space of that begins with the structure and moves outward to a minimum distance of 100 feet or to the property line. Fuel Modification is a part of defensible space. (Firesafe, 2024, p. 38)

The fire behavior analysis concluded that all modeling of the Project can achieve a minimum of 100 feet defensible distance; therefore, with the implementation of **Mitigation Measure WILDFIRE-1** the impacts will be less than significant.

- c) A fire behavior analysis was completed by Firesafe Planning Solutions predicting wildland fire behavior. The fire behavior analysis includes the analysis of Fuels, Slope Height, Slope Ration, Slope Aspect, Wind Patterns and Weather Inputs. Based on the fire behavior analysis on a “worst-case” scenario the maximum flame length of 40 (39.4) feet is possible at the head of the fire when the fire is running directly upslope with a continuous fuel bed that is consistent enough to produce a self-sustaining, self-propagating fire. (Firesafe, 2024, p. 27)

The fire behavior analysis concluded that all modeling of the Project can achieve a minimum of 100 feet defensible distance; therefore, with the implementation of **Mitigation Measure WILDFIRE-1** the impacts will be less than significant.

- d) The topography of the project is such that the project is adjacent to one drainage course along the northerly boundary. The project site is higher in elevation than the drainage course, and any run-on flows are contained within the drainage course. The drainage course is well defined an exhibits in most cases exposed granitic bedrock and outcroppings. The ridgeline of the project, where most of the slopes are located, is composed mostly of granitic rock that is not susceptible to landslides, mudflow and post-fire instability. Additionally, the slopes surrounding and tributary to the structures within the Project are part

of the defensible areas as determined by the fire behavior analysis and will be required to be irrigated and landscaped and not susceptible to wildfire damage. Accordingly, the impacts will be less than significant.

- e) A fire behavior analysis was completed by Firesafe Planning Solutions predicting wildland fire behavior. The fire behavior analysis includes the analysis of Fuels, Slope Height, Slope Ration, Slope Aspect, Wind Patterns and Weather Inputs. Based on the fire behavior analysis on a “worst-case” scenario the maximum flame length of 40 (39.4) feet is possible at the head of the fire when the fire is running directly upslope with a continuous fuel bed that is consistent enough to produce a self-sustaining, self-propagating fire. (Firesafe, 2024, p. 27)

The fire behavior analysis concluded that all modeling of the Project can achieve a minimum of 100 feet defensible distance; therefore, with the implementation of **Mitigation Measure WILDFIRE-1** the impacts will be less than significant.

Mitigation: The following **WILDFIRE Mitigation Measures** are required:

WILDFIRE-1

Prior to issuance of building permits, the Director of the Riverside County Building and Safety Division (or his/her designee) shall verify that a minimum of 100 feet defensible distance is provided on the project plans for any proposed structures.

Monitoring:

Prior to vertical issuance of building permits and prior to final occupancy the Director of the Riverside County Building and Safety Division (or his/her designee) shall verify that a minimum of 100 feet defensible distance has been provided for any of the constructed structures.

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

Source(s): Staff Review; Project Application Materials

Findings of Fact:

As discussed within Section 7, “Biological Resources”, the project does contain resources and habitat that supports fish and/or wildlife species and is necessary to also support fish and/or wildlife populations. The

project, while avoiding land disturbances plant and animal communities to the greatest extent possible, will result in the removal of habitat suitable for certain plant and animal communities. The project as analyzed throughout Section 7, "Biological Resources", is in compliance with the adopted MSHCP, provides for avoidance of the observed Least Bells Vireo found in the southerly watercourse, and was not observed to contain Crotch Bumble Bee's or Burrowing Owls during site surveys where suitable habitat was observed. Additionally, surveys were conducted for candidate sensitive and special species, noting several species with having a high potential to occur onsite or adjacent to the project site. The project was observed to contain habitat linkages associated with wildlife movement which was not being disturbed, however did observe habitat suitable for nesting birds and roosting bats. Surveys performed also observed riparian and riverine habitat falling under the jurisdiction of the California department of Fish and Wildlife, including 06.61 acres of waters of the State and 1.67 acres aquatic features regulated pursuant to the CDFW streambed alteration program, however were not being disturbed as part of the project. Lastly, the analysis included compliance with the Riverside County Oak Tree Management Guild lines and Tree Protection Ordinance with no protected trees or woodland communities being observed.

The analysis concluded that by incorporating **Mitigation Measures BIO-1a through 1b, BIO-2a through 2c, BIO-3a through 3c, BIO-4a through 4b, BIO-5a through 5b, BIO-6a through 6b, and BIO-7a through 7b**, as outlined Section 7, "Biological Resources", implementation of the proposed project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed with Section 9, "Archeological Resources, and Section 39, "Tribal Cultural Resources, four archaeological sites (P-33-026653, P-33-026655, P-33-026656, and P-33-026657) have previously been recorded within the Highland Grove 5 Segment Project. Because the Phase II testing program did not produce any significant surface or subsurface artifact concentrations at any of the sites, sites P-33-026653, P-33-026656 (istoric trash scatters) were determined to be not CEQA-significant and not eligible for listing in the California Register of Historical Resources (CRHR). However, after consulting with the Native American tribes during SB 18 and AB52, it was determined that P-33-026655 (prehistoric lithic scatter) was non extant, and P-33-026657 (bedrock milling feature) was found and would be avoided as part of the project. Therefore, with the incorporation of **Mitigation Measures CUL-1 and CUL-2**, as outlined within Section 9, "Archeological Resources", implementation of the project would be less than significant.

46. Have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?	☐	☒	☐	☐
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Source(s): Staff Review; Project Application Materials

Findings of Fact: The analysis in this analysis includes review of the proposed project's potential impacts regarding items that could be considered cumulative. For most sections, this would encompass nearby areas within unincorporated Riverside County and nearby portions of the City of Riverside, although the cumulative study area may be smaller or larger depending on the section under evaluation. Sections with evaluated

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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potential cumulative are discussed throughout this entire analysis with emphasis on cumulative impacts discussed within the following sections; Air Quality, Biological Impacts, Greenhouse Gas Emissions, Hydrology and Water Quality, Noise, Public Services, Transportation, and Utilities. The analysis shows that the proposed projects cumulative impacts would either be less than significant with mitigation incorporated, less than significant without mitigation or there would be no impacts.

As discussed in Section 6, “Air Quality Impacts”, and Section 20, “Greenhouse Gas Emissions”, cumulative impacts were analyzed related to regional criteria pollutant emissions and determined that these cumulative impacts would be less than significant. The region is currently nonattainment for ozone, PM₁₀, and PM_{2.5}. The proposed project’s regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Therefore, the cumulative impact of the proposed project’s construction emissions on regional air quality would be less than significant. It was also determined that the proposed project’s regional operations emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Therefore, the cumulative impact of the proposed project’s operations emissions on regional air quality would be less than significant, and no mitigation measures are needed.

As discussed within Section 7, “Biological Resources”, impacts related to the Multi-Species Habitat Conservation Plan adopted by Riverside County, specific to the regional habitat and wildlife were analyzed and it was determined with **Mitigation Measures BIO-1a through 1b, BIO-2a through 2c, BIO-3a through 3c, BIO-4a through 4b, BIO 5a through 5b, BIO06a though 6b, and BIO 7a through 7b**, the project would not conflict with the adopted habitat conservation plan, interfere with any native migratory wildlife or species within wildlife corridors, or have and adverse effects on any regional polies, regulations by the CDFW and/or any State or Federally protected wetlands. Therefore, being mitigated to a less than significant impact.

As discussed within Section 23, “Hydrology and Water Quality” impacts relating to the regional downstream tributary, the Santa Ana Regional Water Shed, with regard to downstream hydromodification and water quality impacts were less than significant through implementation of regional and local regulations being analyzed and implemented as part of the project.

As discussed within Section 27, “Noise Effects by the Project”, it was determined that project-related traffic would have no potential to substantially contribute to any cumulatively considerable increases in future roadside ambient noise levels and that no mitigation measures are needed and impacts would be less than significant.

As discussed within those sections relating to “Public Services”, the project would be in compliance with the Developer Impact Fee programs adopted by Riverside County, and in compliance with those service demands projected and analyzed by the Riverside County General Plan, and the projects contribution to those adopted fee programs would supplement any services required by the proposed project. Accordingly, mitigation measures are not needed and impacts would be less than significant.

As discussed within Section 37, “Transportation”, existing, plus ambient growth, plus cumulative traffic volumes associated with the development of the project were analyzed, which included all known cumulative adjacent developments contributing to traffic volumes. Based on the analysis of the cumulative volumes, the project was determined with the incorporation of **Mitigation Measure TRA-1** any conflict with a program, plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle, and pedestrian facilities would be mitigated and the impacts would be less than significant.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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As discussed within Section 35, "Utilities", it was determined that the development of the project, in conjunction with the local utility purveyors, through an analysis of sewer, water, solid waste and energy demands the project would not have any significant impact on the availability of those purveyors to provide utilities to the project, without effecting the current customers utilizing the current infrastructure capacities.

Lastly, as discussed throughout this analysis, the proposed project's cumulative impacts would be less than significant. Mitigation measures, in addition to those already discussed within the prior sections, would be not be required to reduce cumulative impacts. Therefore, the proposed project would contribute to less than significant cumulative impacts.

47. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐
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Source(s): Staff Review; Project Application Materials

Findings of Fact: The proposed project has the potential to result in substantial adverse effects on human beings, either directly or indirectly, as a result of various environmental factors; however, these potential impacts will be mitigated through implementation of design and construction measures.

Wildfire-related hazards, as discussed in Section 44, "Wildfire Impacts" will be minimized by maintaining a minimum 100-foot buffer from any fuel modification zones, as outline with **Mitigation Measure WILDFIRE-1**, thereby reducing the risk of fire spread to habitable structures.

As discussion in Section 37, "transportation", potential hazards related to roadway design features will be mitigated by ensuring all internal and external roadways are designed and constructed in accordance with the Riverside County Transportation Department Design Guidelines and the Caltrans Highway Design Manual, ensuring safe vehicular circulation and emergency access.

In addition, as outlined with the sections relating to "Soils" potential geologic hazards such as liquefaction, ground shaking, landslides, lateral spreading, collapsible soils, and slopes exceeding 10 vertical feet, will be addressed during site grading and development by incorporating the recommendations of a site-specific geotechnical analysis prepared by a licensed professional geotechnical engineer, as outline within **Mitigation Measure GEO-1**

Implementation of these measures will reduce potential environmental effects to less-than-significant levels under CEQA.

VII. EARLIER ANALYSES

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration as per California Code of Regulations, Section 15063 (c) (3) (D). In this case, a brief discussion should identify the following:

Earlier Analyses Used, if any: None

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Location Where Earlier Analyses, if used, are available for review:

Location: County of Riverside Planning Department
4080 Lemon Street 12th Floor
Riverside, CA 92501

VIII. References

The following information sources were used during the preparation of this environmental assessment:

AB 52, 2014	State of California, 2014. <i>Assembly Bill 52, Public Availability</i>
Adkan, 2023	Adkan Engineers, 2023. <i>Site photography and reconnaissance during August, 2023</i>
Adkan, 2024a	Adkan Engineers, 2025. <i>Preliminary Hydrology Study Tentative Tract 39011, (See Appendix "A")</i>
Adkan, 2024b	Adkan Engineers, 2045. <i>Site Specific Preliminary Water Quality Management Plan Tract 39011, (See Appendix, "B")</i>
Adkan, 2024c	Adkan Engineers, 2025. <i>El Sobrante Property Assemblage WMWD Sewer Analysis, (See Appendix, "C")</i>
AGS, 2018	Advanced Geotechnical Solutions, 2018. <i>Updated Preliminary Geotechnical Report (See Appendix, "D")</i>
BFSA, 2024a	Brian F. Smith and Associates, <i>Cultural Resources Assessment Update for Greentree Ranch (Highland Grove 5 Segment) Project, (See Appendix "E")</i>
Caltrans, 2019	California Department of Transportation, 2019. <i>Scenic Highways Map, Public Availability</i>
CARB, 2022	California Air Resources Board. 2022, <i>Designation maps of California for all Criteria Pollutants that are Designated for the State and National Standards, Public Availability</i>
CDC, 1991	California Department of Conservation, 1991. <i>Mineral Resources Maps for the Temescal Valley, Public Availability</i>
CDC, 2020	California Department of Conservation, 2020. <i>California Important Farmland Series Maps (on-line website), Public Availability</i>
CDC, 2023	California Department of Conservation, 2023. <i>California Williamson Act Enrollment Finder (on-line website), Public Availability</i>
CDWR, 2024	California Department of Water Resources, 2023, <i>Groundwater Basin Maps (on-line website), Public Availability</i>
City of Riverside, 2021	City of Riverside, 2021. <i>City of Riverside General Plan Land Use Element, Public Availability</i>

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
DTSC, 2023	California Department of Toxic Substances Control, 2023. <i>Envirostor Cleanup Site Map (on-line website), Public Availability</i>				
FEMA, 2008	Federal Emergency Management Agency, 2008. <i>FEMA Flood Insurance Rate Map (FIRM) Map No. 06065C1385G, Public Availability</i>				
Firesafe, 2024	Firesafe Planning Solutions, 2024. <i>Fire Behavior Report Tentative Tract 39011, (See Appendix "F")</i>				
GeoScience, 2024	McAllister GeoScience, 2024. <i>Phase I Environmental Site Assessment Update Report, (See Appendix "G")</i>				
FCS, 2024	FirstCarbon Solutions, 2024. <i>Aquatic Resources Delineation Report, (See Appendix "H")</i>				
FCS, 2024a	FirstCarbon Solutions, 2024. <i>Crotch's Bumble Bee Site Assessment, (See Appendix "I")</i>				
FCS, 2024b	FirstCarbon Solutions, 2025. <i>Biological Resources Assessment, (See Appendix "J")</i>				
Google Earth, 2024	Google Earth Pro, 2023. <i>Aerial Imagery for Project Site and Surrounding Areas, Public Availability</i>				
LGC, 2024	LGC, 2024. <i>Geotechnical Due Diligence Evaluation and Review of Proposed Residential Development, Tentative Tract Map 39011, North of El Sobrante Road, Riverside County, California (See Appendix "K")</i>				
NRCS, 2024	National Resources Conservation Service, U.S.D.A. <i>Soil Conservation Service Soil Surveys (on-line website), Public Availability</i>				
Project Application Materials, 2024	Tentative Tract Map 39011. <i>Project application to the County of Riverside for approval of a Tentative Tract Map, Change of Zone, Agricultural Preserve Notices of Non-Renewal, and Agricultural Preserve Diminishment</i>				
RCIT, 2024	Riverside County Information Technology, 2023. <i>Riverside County Geographic Information Systems – Map My County (on-line website), Public Availability</i>				
RCTLMA, 2004	Riverside County Transportation and Land Management Agency, 2004. <i>Western Riverside County Multiple Species Habitat Conservation Plan, Public Availability</i>				
RCTLMA, 2023	Riverside County Transportation and Land Management Agency, 2023. <i>RCIP Conservation Summary Report Generator, Public Availability</i>				

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Riverside County, 1996	Riverside County Department of Waste Resources, 1996. <i>Riverside County Countywide Integrated Waste Management Plan, Public Availability</i>				
Riverside County, 2014	Riverside County Transportation and Land Management Agency, 2014. Planning Department, 2020. <i>Countywide Design Standards and Guidelines, Public Availability</i>				
Riverside County, 2019	Riverside County Transportation and Land Management Agency, 2019, <i>Riverside County Climate Action Plan, Public Availability</i>				
Riverside County, 2020a	Riverside County Transportation and Land Management Agency, Planning Department, 2021. <i>Comprehensive Riverside County General Plan Amendment No. 618, Public Availability</i>				
Riverside County, 2020b	Riverside County Transportation and Land Management Agency, Planning Department, 2021. <i>Environmental Impact Report No. 441 (SCH No. 2002051143), Public Availability</i>				
Riverside County, 2020c	Riverside County Transportation and Land Management Agency, Planning Department, 2021. <i>Lake Matthews/Woodcrest Area Plan, Public Availability</i>				
RWQCB, 2010	Regional Water Quality Control Board, 2019. <i>Order No. R8-2010-0033, Public Availability</i>				
RWQCB, 2019	Regional Water Quality Control Board, 2019. <i>SARWQCB Santa Ana Region Basin Plan, Public Availability</i>				
SB 18, 2004	State of California, 2004. <i>Senate Bill 18, Public Availability</i>				
SCAQMD, 1976	South Coast Air Quality Management District, 1976. <i>SCAQMD Rule 402, Public Availability</i>				
SCAQMD, 2022	South Coast Air Quality Management District, 2022. <i>Final 2022 Air Quality Management Plan, Public Availability</i>				
Urban 2025a	Urban Crossroads, 2025. <i>Focused Traffic Assessment Memo for HG5, (See Appendix "L")</i>				
Vista Environmental, 2024	Vista Environmental 2025. <i>Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis, (See Appendix "M")</i>				
Vista Environmental, 2025a	Vista Environmental 2025. <i>Noise Impact Analysis, (See Appendix "N")</i>				
WM, 2024	Waste Management, 2024. <i>Solid Waste Will Serve Letter, (See Appendix "O")</i>				

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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WMWD, 2015	Western Municipal Water District, 2015. <i>2015 Urban Water Management Plan, Public Availability</i>
WMWD, 2025	Western Municipal Water District, 2025. Water and Sewer Will Serve Letter, (See Appendix "P")

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