Initial Study and Mitigated Negative Declaration

Application for Plot Plan Approval

Quick Crete Products Facility

Prepared for:

Lead Agency:

Riverside County Planning Department
Palm Desert Office
77588 El Duna Ct, Suite H
Palm Desert, CA 92211
Phone: (760) 863-8277

TRANSPORTATION AND LAND MANAGEMENT AGENCY

Prepared by:

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CVE
Coachella Valley Engineers

April 16, 2026

Introduction/Overview

Environmental Initial Study/Mitigated Negative Declaration Overview

Project Title: **QCP Fabrication Facility Plot Plan**

Case No: **Plot Plan No. 250012**

Lead Agency **Riverside Co. Planning Department**
Palm Desert Office
77588 El Duna Ct, Suite H
Palm Desert, CA 92211
Phone: (760) 863-8277

Contact Person David Turner
(760) 360-4200

Sponsor's Name And Address: **Quick Crete Products Facility**
731 Parkridge Ave
Norco, CA 92860

Project Location: Southside of 54th Avenue, East of Harrison Street
Thermal, CA 92274
APN: 763-230-006

Project Description: Plot Plan Approval for 20 Acre Quick Crete Products Facility

General Plan Designations: LI (Light Industrial)

Zoning Classifications: M-SC (Manufacturing Service Commercial)

Onsite and Surrounding Land Uses/Setting: The Subject Property is developed agriculturally with rows of planted palm trees with no other improvements and no business activity taking place. The general area is a mixture of farmlands, commercial and residential development.

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North: 54th Avenue with residential subdivision beyond.

South: South of the Subject Property is vacant undeveloped land.

East: East of the Subject Property is vacant land with residence and commercial beyond.

West: West of the Subject Property is a residence and vacant land with farmland beyond.

Other Maps and Exhibits
Regional Map/Regional Topo





Topo Sheet



Topographic Map

Vacant Lot - Project No. 24-008388-02-2
Southside of Avenue 54, east of Harrison St
Thermal, CA NA
Project #: V24-4021

Nova Group

Site Aerial



Subject Property Details Map

Vacant Lot
Southside of Avenue 54, east of Harrison Street
Thermal, California 92274
Project#: V24-4021

Nova Group

CEQ / EA No.

Site Photographs



Subject Property eastern border looking south



Subject Property northern border looking west



Subject Property southern border looking west



Subject Property western border looking south



Typical view of Subject Property



Typical view of Subject Property



Typical view of Subject Property



Typical view of Subject Property



Adjoining property to the north



Adjoining property to the east



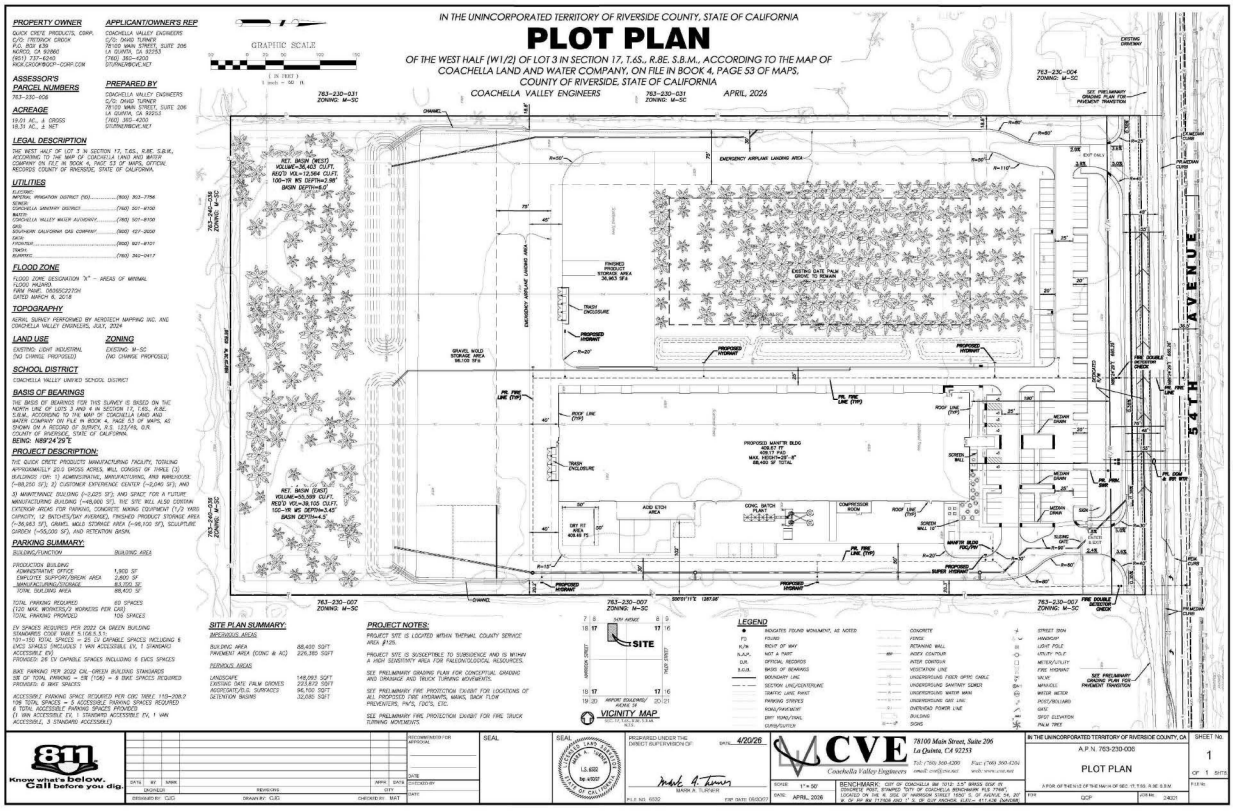
Adjoining property to the south



Adjoining property to the west

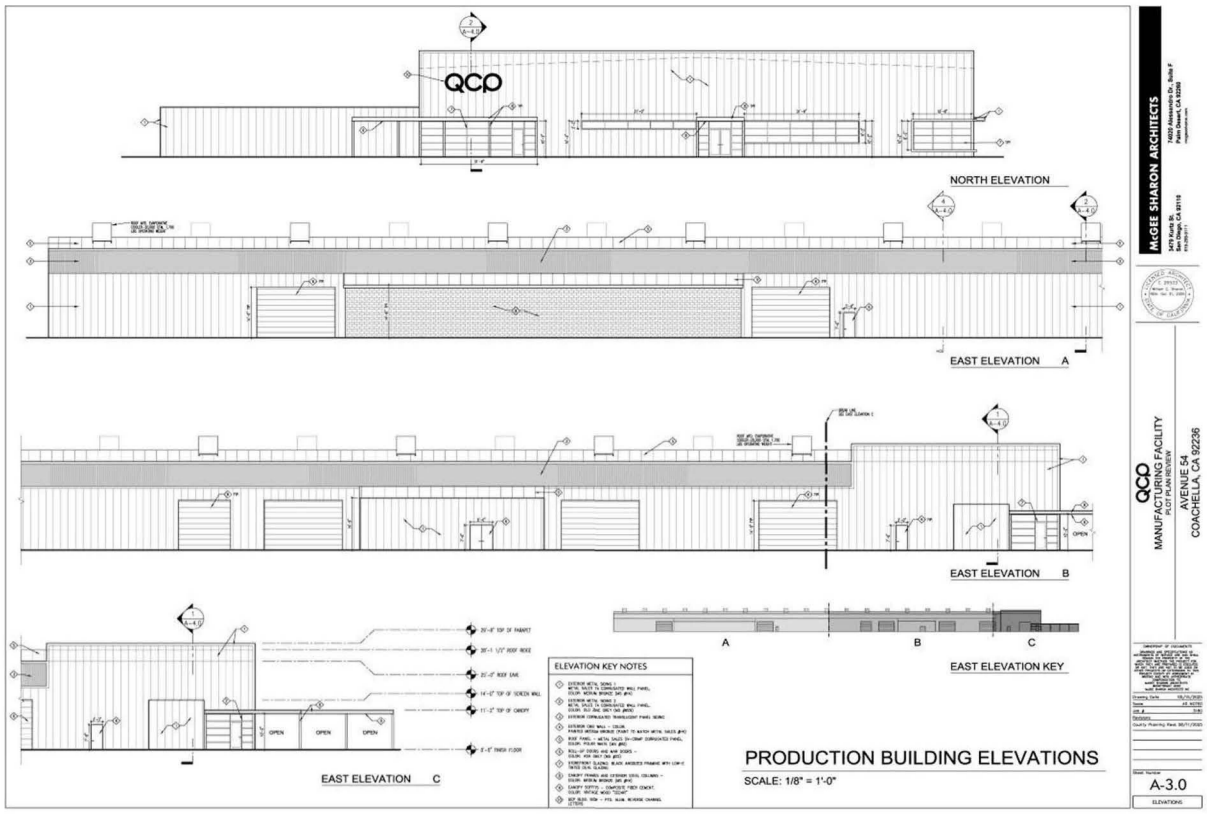
Plot Plan

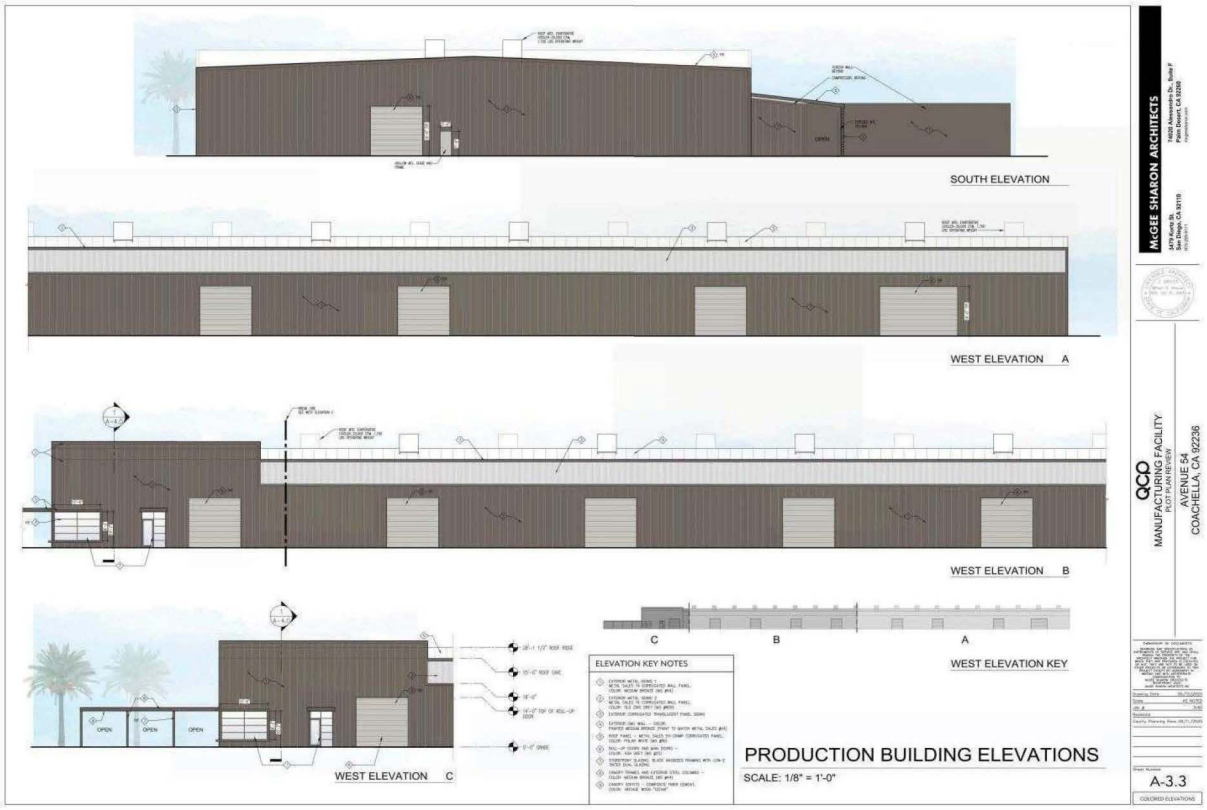
CEQ / EA No.



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Elevations


NORTH ELEVATION
EAST ELEVATION A
EAST ELEVATION B
EAST ELEVATION KEY
EAST ELEVATION C
ELEVATION KEY NOTES
PRODUCTION BUILDING ELEVATIONS
SCALE: 1/8" = 1'-0"
McGEE SHARON ARCHITECTS
QCP
MANUFACTURING FACILITY
PLOT PLAN REVIEW
AVENUE 54
COACHELLA, CA 92236
A-3.0
ELEVATIONS


SOUTH ELEVATION
WEST ELEVATION A
WEST ELEVATION B
WEST ELEVATION KEY
WEST ELEVATION C
ELEVATION KEY NOTES
PRODUCTION BUILDING ELEVATIONS
SCALE: 1/8" = 1'-0"
McGEE SHARON ARCHITECTS
QCP
MANUFACTURING FACILITY
PLOT PLAN REVIEW
AVENUE 54
COACHELLA, CA 92236
A-3.3
COLORED ELEVATIONS

COUNTY OF RIVERSIDE
ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Environmental Assessment (CEQA / EA) Number: CEQ260018
Project Case Type (s) and Number(s): Plot Plan No. 200025
Lead Agency Name: County of Riverside Planning Department
Address: 4080 Lemon Street 12th Floor, Riverside, CA 92501
Contact Person: David Turner
Telephone Number: (760) 360-4200
Applicant's Name: Quick Crete Products Facility
Applicant's Address: 731 Parkridge Avenue
Norco, CA 92860

I. PROJECT INFORMATION

Project Description:

The project requests Plot Plan approval for a Quick Crete Products (QCP) concrete furniture manufacturing facility. The facility will produce concrete benches, containers, and tables within an 88,400-square-foot building. Of this total, 83,700 square feet will be used for manufacturing and warehouse operations, 1,900 square feet for administrative offices, and 2,800 square feet for employee support and break areas. The site will be served by a 106-space parking lot.

The Plot Plan also includes a mini concrete batch plant for on-site use only, a 36,963-square-foot outdoor storage area for finished products, and a 96,100-square-foot area for mold storage. The concrete mixing area will consist of equipment with a ½-yard capacity per batch, producing an average of 12 batches per day. In addition, the plan identifies a separate 62,000-square-foot area that is not part of the current project. Any expansion will be subject to planning approvals with the submittal of a substantial conformance or a revision, dictated by Ordinance 348.

Existing date trees will be preserved and incorporated into the site's landscaping where feasible, including within the Products and Sculpture Garden, a 32,085-square-foot detention basin, the undeveloped portion of the site, and along parking and entry areas.

The project is designed to support pedestrian access through sidewalk improvements along its frontage on 54th Avenue as part of full half-street improvements. Two gated entrances are proposed for access from Avenue 54: the west gate will allow right-in/right-out movements only, while the east gate will permit westbound left-turn access for both passenger vehicles and trucks.

Potable water and sewer services will be provided by the Coachella Valley Water District. Stormwater will be managed through on-site percolation. Electricity will be supplied by Southern California Edison, and natural gas service will be provided by Southern California Gas Company.

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

B. Total Project Area:

Residential Acres: 0	**Lots:** 0	**Units:** 0	**Projected No. of Residents:** 0
Commercial Acres: 0	**Lots:** 1	**Sq. Ft. of Bldg. Area:** 0	**Est. No. of Employees:** 0
Industrial Acres: 19.01	**Lots:** 0	**Sq. Ft. of Bldg. Area:** 88,400	**Est. No. of Employees:** 100
Other: 0			

C. Assessor's Parcel No(s): 763-230-006

Street References: Adjacent south of 54th Avenue and east of Harrison Street

D. Section, Township & Range Description or reference/attach a Legal Description:

The Subject Property includes one (1) assessor's parcel totaling approximately 19.01 acres adjacent to and south of 54th Avenue and east of Harrison Street. The Subject does not have a property address. 19.01 ACRES IN POR LOT 3 MB 004/053 COACHELLA LAND & WATER CO, T6S, R8E SEC 17, unincorporated community of Thermal.

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

II. The Subject Property is a single tract of land which is rectangular-shaped and approximately 19.01 acres in size. The Subject Property is developed agriculturally with rows of planted palm trees. Access to the Subject Property is provided from Avenue 54 to the north. No structures or significant surface features were noted on the Subject Property at the time of the reconnaissance. Riverside County Building Department records indicate that no permits have ever been issued for the Subject Property. The Subject Property is not fenced. Surrounding properties include combined residential and vacant land.

III. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

1. Land Use:

The Project site is located within the Eastern Coachella Valley Plan (ECVP) of the County of Riverside's General Plan. The General Plan and ECVP designate the site for Light Industrial (LI) land uses. The Light Industrial land use designation allows for a wide variety of industrial and related uses, including assembly and light manufacturing, repair and other service facilities, warehousing, distribution centers, and supporting retail uses. Building intensity ranges from 0.25 to 0.6 FAR. Light Industrial uses will be permitted based on their compatibility with surrounding land uses.

Land Use Designations	Light Industrial (LI)
Area Plan	Eastern Coachella Valley
General Plan Policy Areas	Not in
General Plan Policy Overlay	No In
Airport Influence Areas	Jacqueline Cochran
Airport Compatibility Zones	Jacqueline Cochran, Zone D

2. Agricultural:

The project proposes land uses and land use intensities which are consistent with the adopted General Plan. The project could contribute to the cumulative loss of farmland in the County. The Board of Supervisors found that there were no feasible mitigation measures or alternatives that could have satisfied the loss of prime Farmland designated for statewide importance. Therefore, the Board of Supervisors adopted the findings of overriding considerations on October 7, 2003:

Comprehensive General Plan Amendment No. 618 (GPA00618)*
Environmental Assessment (EA) No. 38614
Environmental Impact Report (EIR) No. 441
State Clearinghouse No. 2002051143

The project will not cause additional impacts to agricultural resources which have not been previously analyzed. Based upon the above actions, impacts to agricultural lands would be reduced to less than significant levels with mitigation incorporated.

3. Circulation: Scenic Corridors

IN OR PARTIALLY WITHIN A CIRCULATION ELEMENT RIGHT-OF-WAY

*Document is available at County of Riverside Administrative Center located at 4080 Lemon Street, Riverside, CA 92501 12th Floor
The proposed Project was reviewed for conformance with Riverside County Ordinance No. 461, "Road Improved Standards and Specifications" by the Riverside County Transportation Department. Adequate circulation facilities exist and are proposed to serve the proposed Project. The proposed Project meets all applicable circulation policies of the General Plan.

4. Multipurpose Open Space:

No natural open space land is required to be preserved within the boundaries of this Project, as the entire site is farmed with date trees. The Project would be consistent with or otherwise would not conflict with the Coachella Valley Multiple Species Habitat Conservation Plan (MSHCP). Additionally, no riparian or other sensitive vegetation is located on the site and the site is not a wildlife corridor and is not located in a floodway or floodway fringe area. The site also does contain Prime Farmland agricultural resources, along with Farmland of Local Importance. No mineral resources, or any known of significant cultural resources are located on the site, however, it is within an area with High Sensitivity for Paleontological Resources. The Project would not be a water-intensive use and the Project's landscaping plan complies with County Ordinance No. 859.3, "Water Efficient Landscape Requirements".

5. Safety:

The proposed Project allows for the provision of emergency response services to the existing and future users of the Project through the Project's design. The proposed Project meets other applicable Safety Element policies, including not being located in a seismic fault rupture area or area subject to landslides or seiches. The Project site does have a high potential for liquefaction which is mitigated by geotechnical mitigation provisions required by the site specific soils study. The site is also not located in a flood hazard area or wildfire hazard area. The Project site is located within "Compatibility Zone D" of the Jacqueline Cochran Regional Airport Master Plan (JCRA) Influence area and is therefore subject to the JCRA Land Use Compatibility Plan (ALUCP). Within Compatibility Zone D, there is no limitation of intensity per acre of non-residential development. Further, the Riverside County Airport Land Use Commission (ALUC) will review the Project for air hazard safety and Project consistency with the Jacqueline Cochran Airport Land Use Compatibility Plan subject to conditions of approval which the County will impose as conditions of approval.

6. Noise:

The proposed Project meets all applicable Noise Element policies and would not exceed Riverside County noise standards as concluded by the analysis contained herein. Compliance with Riverside County Ordinance No. 847 (regulating noise) will assure that any that potential impacts related to outdoor operations on the site would be less than significant. The Project's construction and operational activities are required to comply with the Riverside County Noise Ordinance found in County Code Section 9.52.020.

7. Housing:

No housing is proposed by this Project. The Project would not displace any existing housing. There are no significant adverse impacts to housing as a direct result of this Project.

8. Air Quality:

The proposed Project will be conditioned by Riverside County to control any fugitive dust during construction activities in accordance with the SCAQMD Rule 403. As concluded by the analysis contained herein, the proposed Project would not exceed the SCAQMD's regional emission significance threshold for any criteria pollutant during its operation; would not exceed the SCAQMD's significance thresholds for cancer and non-cancer health risks beyond thresholds of significance established by the SCAQMD; and would not create objectionable odors that affect sensitive receptors. The proposed Project is consistent with or otherwise would not conflict with all applicable Air Quality Element policies.

9. Healthy Communities:

The proposed Project would not result in any significant localized air quality impacts affecting nearby sensitive receptors (i.e., residential uses). The Project accommodates sidewalk connections which would encourage walking and other physical activity. The Project is designed to retain 32,085 square feet of existing palm trees as a detention basin in the south portion of the site and also includes a large area of existing palm trees in the center of the site as a "Product and Sculpture Garden." The Project site is not subject to severe natural hazards. The Project also would provide local jobs, which would assist the County in reducing the substantial out-of-county job commutes.

10. Environmental Justice: Thermal-Oasis Environmental Justice Community

The QCP site is located within the Thermal Environmental Justice (EJ) Community. The applicant will complete the EJ checklist and propose various site improvements to mitigate aesthetic and air quality impacts to meet this standard. Those measures are as follows:

1. Uphold the South Coast Air Quality Management District standard for AQMD permits.
2. Utilize low emission diesel fuel equipment in the ongoing operations.
3. Install an evaporative cooler system to reduce energy usage and hydrofluorocarbon emissions.
4. Generate a majority of the power needs for the facility by solar power.
5. Utilize existing palm trees on the site to help blend the facility into the surrounding environment.
6. Employ approximately 100 people from the local area.

The applicant also intends to voluntarily provide in excess of $100,000.00 in proposed site amenities in support of the proposed Desert Recreation District Thermal Community Park.

B. General Plan Area Plan(s): Eastern Coachella Valley

C. Foundation Component(s): Thermal

D. Land Use Designation(s): Light Industrial

E. Overlay(s), if any: None

F. Policy Area(s), if any: None

G. Adjacent and Surrounding:

1. General Plan Area Plan(s): Eastern Coachella Valley

2. Foundation Component(s): Community Development

3. Land Use Designation(s):

North-54th Avenue and City Residential

South-LI
East-LI
West-LI

4. **Overlay(s), if any:** None

5. **Policy Area(s), if any:** None

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: M-SC (Manufacturing Service Commercial)

J. Proposed Zoning, if any: None

K. Adjacent and Surrounding Zoning:

North-54th Avenue and City R-1
South-M-SC
East-M-SC
West-M-SC

IV. 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	

V. 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

4/22/26
Date

Jose Merlan
Printed Name

For: John Earle Hildebrand III
TLMA Planning Director

CEQ / EA No.

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 or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

Source(s): Project Application Materials; California Department of Transportation (Caltrans) Scenic Highways and Designated and Eligible Routes (Caltrans, 2020); Caltrans California Scenic Highway Mapping System (Caltrans, n.d.); Riverside County General Plan Figure C-8 "Scenic Highways" (Riverside County, 2015a); Southern California Association of Governments (SCAG), U.S. Census Urbanized Areas - SCAG Region (SCAG, 2024); Riverside County Ordinance No. 348: Providing for Land Use Planning and Zoning Regulations and Related Functions of the County of Riverside (Riverside County, 2019b)

Findings of Fact:

a) **Less Than Significant Impact.** The Project site is zoned M-SC (Manufacturing Service Commercial) ad designated LI (Light Industrial) on the Riverside County General Plan Land Use Map. According to the General Plan Figure C-8, "Scenic Highways," the Project site is located approximately 3.8 miles south of a Scenic Highway Corridor as designated on a "County Eligible Scenic Highway," (I-10) and approximately 2.0 miles west of a Scenic Highway Corridor as designated "Non Designated" (Hwy 86). From the subject property, scenic views of the San Jacinto Mountains to the west, San Bernardino Mountains to the north and east, and views of the Santa Rosa Mountains to the south and west. The site is located on the valley floor and views of the lower elevations of the mountains are still mostly visible in all directions. Also, full views of the middle and upper elevations of the mountains are visible in all directions.

The Project site is a currently a planted date grove and is bounded by a roadway on the north with a residential subdivision beyond (City of Coachella), vacant land on the south and, east and a residence on the west. The Project proposes to develop a single-story QCP Fabrication Facility that will be placed back 150 feet from the roadway on the site with building elevations showing a roofline of 31 feet and maximum features of 35 feet. The Project building would be sited near the east-central portion of the property where it would not affect existing structures in the vicinity. The Project building also would not be taller than existing agricultural structures in the Project vicinity. All views of the San Jacinto, San Bernardino Mountains and Santa Rosa Mountains will remain.

A PM10 Dust Mitigation Plan required during Project grading would also improve aesthetics during Project grading. The design of this proposed Project development will be compatible with the existing environmental and surrounding setting. Project implementation is not expected to result in adverse effects on the local scenic setting. With the construction of the proposed Project, views of surrounding mountains will remain, and impacts to scenic highway corridors will be less than significant.

b) **Less Than Significant Impact.** The Project site does not contain or is located near any scenic resources, such as trees, rock outcroppings, historic buildings or other features that could be damaged by Project implementation. Accordingly, the proposed development will not involve any form of structural demolition. As shown on Site Aerial Map and Photographs, under existing conditions, the Project site is graded and planted with date trees.

The Project site is zoned M-SC (Manufacturing Service Commercial). According to the Riverside County General Plan Figure C-8, "Scenic Highways," the Project site is located approximately 3.8 miles south of a Scenic Highway Corridor as designated on a "County Eligible Scenic Highway," (I-10) and approximately 2.0 miles west of a Scenic Highway Corridor as designated "Non Designated (Hwy 86).

The Project buildings' potential obstructions to mountain views would be negligible. Buildings are placed toward the east-central portion of the Project site, adjacent to vacant land and 150 feet south of 54th Avenue with the long access parallel with the long-rectangle shaped parcel. No Project building would be taller than the structures in the Project vicinity Accordingly, the Project would not obstruct any mountain views in the corridor. All views of the San Jacinto, San Bernardino Mountains and Santa Rosa Mountains will remain. Impacts would be less than significant.

The Project would be constructed over a period of approximately 16 months. Heavy equipment would be used, which would be visible to the immediate surrounding areas during the temporary construction period. Construction activities are a common occurrence in the developing Coachella Valley region of southern California and are not considered to result in the creation of an aesthetically offensive site open to public view. Furthermore, except for the short-term use of cranes during building construction, the construction equipment is expected to be low in height and not substantially visible to the surrounding area. All construction activities would be temporary in nature and all construction equipment would be removed from the Project site following completion of construction activities. For these reasons, temporary aesthetic effects during the Project's construction period would be less than significant.

The orientation of the main building with the long access in conformance with the parcel's long rectangular shape, and presenting a minimal frontage to 54th Avenue, softens the visual prominence of the building from public viewing areas, further removed behind a landscaped parking lot. Therefore, due to the lack of public viewing locations on the Project site and the prominence of buildings in the surrounding area, as well as the main building's location on the Project site, the Project would not substantially damage scenic resources or 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. Impacts would be less than significant.

c) **Less Than Significant Impact.** According to mapping information provided from the SCAG, which is based on U.S. Census data for urbanized areas, the Project site is located within a "non-urbanized area" (SCAG, 2024). The Project site is zoned M-SC (Manufacturing Service Commercial). All views of the San Jacinto, San Bernardino Mountains and Santa Rosa Mountains will remain. Therefore, with compliance with the zoning development standards and regulations, the Project's potential to result in a conflict with applicable zoning and other regulations governing scenic quality would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
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 Ordinance No. 655 (Regulating Light Pollution) (Riverside County, 1988); Riverside County General Plan Draft EIR No. 521 Section 4.4 "Aesthetics and Visual Resources" (Riverside County, 2015b)

Findings of Fact:

According to the Riverside County General Plan Draft EIR No. 521, the Project site is located within Zone B of the Mt. Palomar Nighttime Lighting Policy Area (Riverside County, 2015b, Figure 4.4.1). All developments within Zone B of the Mt. Palomar Nighttime Lighting Policy Area, including the Project, are required to adhere to the requirements of Riverside County Ordinance No. 655, which controls artificial lighting sources to protect the observatory. The Project's Conditions of Approval imposed by Riverside County require compliance with all such mandatory requirements and the County of Riverside would be obligated to review subsequent building permits to ensure compliance. Therefore, because the Project would be required to comply with Ordinance No. 655, the Project's potential to interfere with the nighttime use of the Mt. Palomar observatory would be less than significant.

Applicable Regulatory Requirement:

- The Project is required to comply with Riverside County Ordinance No. 655, which is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp sources and shielding of light emissions for outdoor fixtures to reduce "skyglow" or light pollution that affects day or nighttime views from Mt. Palomar Observatory (located approximately 44 miles southwest of the Project site in northern San Diego County).

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): On-site Inspection, Project Application Materials; Riverside County Ordinance No. 655 (Riverside County, 1988); Riverside County Ordinance No. 915 (Riverside County, 2012)

Findings of Fact:

a) **Less than Significant Impact.** The site is located in a rural environment that includes existing sources of light and glare associated with nearby land uses. Nearby sources of light include exterior lighting on commercial, agricultural and residential buildings, street lighting on the adjacent 54th Avenue, passing vehicle headlights, and outdoor lighting on surface parking lots and buildings. Currently, there are no existing sources of light on the immediate Project site.

Short-Term (Construction-Related) Impacts
During the construction phase, there would be no need to add security lighting for construction areas or construction staging areas, because nighttime construction is not anticipated. Therefore, impacts related to new sources of light and glare during construction would be less than significant.

Long-Term (Operations-Related) Impacts
At Project buildout, the site can be expected to generate increased levels of light and glare from interior and exterior building lighting, safety and security lighting, landscape lighting, and vehicles accessing the site during the day, however, it would not require use of high intensity lighting. Glare can also be expected from building windows during the day. However, lighting and glare levels are not expected to exceed typical levels within the surrounding urban environment with little or no light escaping upward from the site. The Proposed Project will be designed in accordance with the County's Public Works Engineering Standards, Street Light Nonresidential Area and will properly shield light fixtures to minimize spillage onto adjacent properties. The Zoning Ordinance design standards will be incorporated as conditions of approval to assure that the proposed Project's light and glare impacts will be less than significant.

b) **Less than Significant Impact.** Refer to response 3.a) above. There nearest sensitive receptors in the vicinity of the Project are the residence adjacent west and the residential subdivision north of 54th Avenue (in the City of Coachella). The Project will be required to comply with Riverside County Ordinance No. 915 (Outdoor Lighting), which generally would preclude significant lighting impacts to surrounding properties, including existing single-family homes. Mandatory compliance with the County's lighting requirements would ensure that the Project would not expose residents or residential properties to unacceptable light levels, and a less-than-significant impact would occur.

Applicable Regulatory Requirement

- The Project is required to comply with Riverside County Ordinance No. 915, which is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life.

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): Project Application Materials; Riverside County General Plan Figure OS-2 "Agricultural Resources" (Riverside County, 2015a); Riverside County GIS Database (RCIT, 2020); California Department of Conservation California Important Farmland Finder (CDC, 2016); Ordinance No. 625: An Ordinance of the County of Riverside Amending Ordinance No. 625 Providing A Nuisance Defense for Certain Agricultural Activities, Operations, And Facilities And Providing Public Notification Thereof (Riverside County, 1994); California Department of Conservation Land Evaluation & Site Assessment Model (LESA) (CDC, 1997); United States Department of Agriculture "Soil Survey of the Coachella Valley Area (1980); University of California, Davis California Resource Lab (UC Davis California Soil Resource Lab, 2020); University of California Division of Agriculture and Natural Resources, A Revised Storie Index for Use with Digital Soils Information (UCANR, 2008). EIR No.441 State Clearinghouse No. 2002051143.

Findings of Fact:

a) **Less Than Significant Impact.** The entire Project site is classified as "Indio Series Fine Sandy Loam, wet" by the United States Department of Agriculture "Soil Survey of the Coachella Valley Area." According to the Farmland Mapping & Monitoring Program (FMMP) California Important Farmland Finder and as reported by Riverside County GIS database and the Riverside County General Plan, the Project site contains lands defined by the FMMP as "Prime Farmland," (approximately 19.01 acres) and "Urban Built- Up Land" (CDC, 2016; RCIT, 2020; Riverside County, 2015a, Figure OS-2). Also, there are areas surrounding the Project site that contain designated Farmland. The Project site has been farmed with date trees for approximately 15 years, however, farming operations have ceased on the site. However, while there is some active farming occurring in the general area, aside from the adjacent northwest residence date garden there is no active farming adjacent to the Project site.

The Project will convert approximately 19.01 acres of "Prime Farmland," to a nonagricultural use. The impacts of converting properties from agricultural to manufacturing uses are included in a Certified Environmental Impact Report previously prepared for the 2003 Riverside County Integrated Project. The General Plan determined that the loss of prime, unique, and farmland of statewide importance remains a significant unavoidable impact of implementing the adopted General Plan. The project proposes land uses and land use intensities which are consistent with the adopted General Plan. The project could contribute to the cumulative loss of farmland in the County. The Board of Supervisors

found that there were no feasible mitigation measures or alternatives that could have satisfied the loss of prime Farmland designated for statewide importance. Therefore, the Board of Supervisors adopted the findings of overriding considerations on October 7, 2003:

Comprehensive General Plan Amendment No. 618 (GPA00618)
Environmental Assessment (EA) No. 38614
Environmental Impact Report (EIR) No. 441
State Clearinghouse No. 2002051143

The project will not cause additional impacts to agricultural resources which have not been previously analyzed. Based upon the above actions, impacts to agricultural lands would be reduced to less than significant levels with mitigation incorporated.

b) **Less than Significant Impact**. The Project site is zoned M-SC (Manufacturing Service Commercial) which allows for agricultural use. The Project site is also not subject to a Williamson Act contract. Under existing conditions, the Project site though currently planted with date palms. As shown on Riverside County GIS, the Project site is not a part of an agricultural preserve and there are no lands identified as agricultural preserves on any lands surrounding the Project site (RCIT, 2020). Therefore, because the Project would not conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve impacts will be less than significant as a result of development of the proposed Project.

c) **Less than Significant Impact**. The Project site is bound on the north by 54th Avenue. North beyond 54th the property is in the City of Coachella and zoned R-1. The existing land uses of surrounding properties were previously described in Section II-K. The Riverside County General Plan and EVAP designate all surrounding properties to the south, east and west as M-SC. The nearest property containing agriculturally zoned land is located approximately 4,930 feet southwest of project site west of Harrison Street. Therefore, because the Project site is not located within 300 feet of agriculturally zoned property, the proposed Project has no potential to cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 “Right-to-Farm”). Therefore, impacts will be less than significant.

d) **Less than Significant Impact**. “Farmland” is defined in Section II.a of Appendix G to the State CEQA Guidelines to mean Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As described under Threshold 4(a), above, the Project site has been designated “Light Industrial” by the Riverside County General Plan Riverside County General Plan Figure OS-2 “Agricultural Resources”. The Project site is zoned M-SC (Manufacturing Service Commercial). Additionally, all immediately adjacent property has been designated and zoned for urban density development. And above under Threshold 4(c), lands adjacent to the Project site are not designated Farmland by the FMMP. As such, because there are no components of the proposed Project that would result in changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use, therefore, impacts will be less than significant as a result of development of the proposed 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
5. Forest a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?	☐	☐	☐	☒
b) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	☐	☐	☐	☒

Source(s): Project Application Materials; Riverside County General Plan Figure OS-3a "Forestry Resources Western Riverside County Parks, Forests, and Recreation Areas" (Riverside County, 2015a); Riverside County GIS (RCIT, 2020); Google Earth Pro (Google Earth Pro, 2020)

Findings of Fact:

a) **No Impact.** The Project site is not zoned as forest land and there are no lands within the Project site's vicinity that are zoned for forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Code § 4526), or Timberland Production (as defined by Government Code § 51104(g)). Due to the lack of forest land in the Project area, the Project would not conflict with zoning of forest land or result in the loss of forest land or the conversion of forest land to non-forest use. No impact would occur.

b) **No Impact.** As previously discussed in Threshold 5.a), the Project site is not zoned for forest land and does not contain any forest land. Additionally, because there are no forest lands in the Project vicinity, the Project would not have the potential to involve other changes to the existing environment which, due to their location or nature, could indirectly result in the conversion of forest land to non-forest use. (Riverside County, 2015a, Figure OS-3a; RCIT, 2020; Google Earth Pro, 2020) No impact to forest land would occur as a result of development of the proposed Project.

c) **No Impact.** Implementation of the Project would not develop or disturb any lands that contain forest land and, as such, there would be no potential for the Project to cause the loss of forest land or the conversion of forest land to non-forest use. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

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

Source(s): Riverside County General Plan, Riverside County Climate Action Plan ("CAP"), SCAQMD CEQA Air Quality Handbook, Trip Generation & Vehicle Miles Traveled Screening Analysis for the proposed QCP Fabrication Facility Plot Plan, Air Quality Impact Analysis, Urban Crossroads, (January, 2025).

The project is located within the community of Thermal and is within the Salton Sea Air Basin (SSAB) within the jurisdiction of the Southern California Air Quality Management District (SCAQMD). The SSAB (also referred to herein as "the Basin") is aligned in a north-west-southwest orientation stretching from Banning Pass to the Mexican border. The regional climate, as well as the temperature, wind, humidity, precipitation, and amount of sunshine significantly influence the air quality in the Basin. The SCAQMD is responsible for the development of the regional Air Quality Management Plan and efforts to regulate pollutant emissions from a variety of sources.

The climate of the Coachella Valley is a continental, desert-type climate, with hot summers, mild winters, and very little annual rainfall. Precipitation is less than six inches annually and occurs mostly in the winter months from active frontal systems and in the late summer months from thunderstorms. Almost all of the annual rainfall comes from the fringes of mid-latitude storms from late November to early April with summers often being completely dry. Temperatures exceed 100 degrees Fahrenheit (°F), on the average, for four months each year, with daily highs near 110 °F during July and August. Summer nights are cooler with minimum temperatures in the mid-70s. During the winter season, daytime highs are quite mild, but the dry air is conducive to nocturnal radiational cooling, with early morning lows around 40 °F.

The Coachella Valley and adjacent areas are exposed to frequent gusty winds. The flat terrain of the valley and strong temperature differentials, created by intense solar heating, produce moderate winds and deep thermal convection. Wind speeds exceeding 31 miles per hour (mph) occur most frequently in April and May. On an annual basis, strong winds (greater than 31 mph) are observed 0.6 percent of the time and speeds of less than 6.8 mph account for more than one-half of the observed winds. Prevailing winds are from the northwest through southwest, with secondary flows from the southeast. The strongest and most persistent winds typically occur immediately to the east of Banning Pass, which is noted as a wind power generation resource area. Aside from this locale, the wind conditions in the remainder of the Coachella Valley are geographically distinct. Stronger winds tend to occur closer to the foothills. Less frequently, widespread gusty winds occur over all areas of the Valley.

Portions of the SSAB experience surface inversions almost every day of the year. Inversions in the SSAB are attributed to strong surface heating, but are usually broken, allowing pollutants to disperse more easily. Weak surface inversions are caused by cooling of air in contact with the cold surface of the earth at night. In the valleys and low-lying areas, this condition is intensified by the addition of cold air flowing downslope from the hills and pooling on the valley floor. In addition, inversions in the SSAB caused by the presence of the Pacific high-pressure cell can cause the air mass aloft to sink. As the air descends, compressional heating warms the air to a temperature higher than the air below. This subsidence inversion can act as a nearly impenetrable lid to the vertical mixing of pollutants. These inversions can persist for one or more days, causing air stagnation and the buildup of pollutants. Subsidence inversions are common from November through June and are relatively absent from July through October.

Within the Project area, there is a natural sand migration process, called "Blowsand" that has direct and indirect effects on air quality. Blowsand produces particulate matter (PM10) in two ways: (1) by direct particle erosion and fragmentation as natural PM10, and (2) by secondary effects, as sand deposits on road surfaces. Also, where water has already receded around the Salton Sea, the surface areas contain a salty mix of sediments that can change from a hardened salt crust to a fluffy soft layer of dust depending upon the season. Exposed sediments could elevate PM10 levels throughout the region. Almost 120,000 acres of Salton Sea lakebed could be exposed as inflows to the Sea decrease in future years. Local communities may be affected by 60,000 potentially dust-blowing acres, which will cause PM10 levels to rise.

Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. Monitoring stations are located in Indio, Palm Springs and Mecca. To maintain compliance with the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), SCAQMD has adopted a series of Air Quality Management Plans (AQMPs). 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.

a) Less Than Significant Impact. The Project site is located within the SSAB and is subject to SCAQMD's 2022 AQMP and the 2003 CV PM10 SIP. 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 was previously 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, these state and federal air quality standards are exceeded in most parts of the SCAB. 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.

In December 2022, the SCAQMD released the Final 2022 AQMP (2022 AQMP). The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the CAAQS, 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 (23). Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 RTP/SCS, a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements (24). The Project's consistency with the AQMP will be determined using the 2022 AQMP as discussed below.

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.

Construction Impacts – Consistency Criterion 1

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if localized or regional significance thresholds were exceeded. As evaluated, the Project's localized and regional construction-source emissions would not exceed applicable regional significance threshold and LST thresholds. As such, a less than significant impact is expected.

Operational Impacts – Consistency Criterion 1

As evaluated, the Project's localized and regional operation-source emissions would not exceed applicable regional significance threshold or LST thresholds. As such, a less than significant impact is expected.
On the basis of the preceding discussion, the Project is determined to be consistent with the first criterion.

CONSISTENCY CRITERION NO. 2

The Project will not exceed the assumptions in the AQMP based on the years of Project buildout phase.

The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the Riverside County General Plan is considered to be consistent with the AQMP.

Construction Impacts – Consistency Criterion 2

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, when considering that no emissions thresholds will be exceeded, a less than significant impact would result.

Operational Impacts – Consistency Criterion 2

The Project site is currently zoned as Manufacturing Service Commercial (M-SC), which generally allows for light industrial uses.

The Project's proposed uses are consistent with the site's land use designation. As such, the Project is determined to be consistent with the second criterion.

AQMP CONSISTENCY CONCLUSION

The Project would not have the potential to result in or cause NAAQS or CAAQS violations. The Project's proposed uses are consistent with the General Plan land use designation and the Project would not exceed the regional or localized construction and operational thresholds. As such, the Project is considered to be consistent with the AQMP and less than significant impacts are anticipated.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) Less Than Significant Impact. A project is considered to have significant impacts if there is a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. As previously stated, the SSAB is currently a non-attainment area for PM10 and ozone. Therefore, if the project's construction and/or operational emissions exceed SCAQMD thresholds for PM10 and ozone precursors, which include carbon monoxide (CO), nitrous oxides (NOx), and volatile/reactive organic compounds (VOC or ROG), then impacts would be cumulatively considerable and significant.

The air quality impact analysis quantifies air quality emissions generated by construction and operation of the Project and addresses whether the Project conflicts with implementation of the SCAQMD's AQMP. The analysis of Project-generated air emissions determines whether the Project would result in a cumulatively considerable net increase of any criteria pollutant for which the SCAB is in nonattainment under an applicable NAAQS and CAAQS. Additionally, the Project has been evaluated to determine whether it would expose sensitive receptors to substantial pollutant concentrations and the impacts of odors.

The SCAQMD has also developed regional and localized significance thresholds for other regulated pollutants. SCAQMD's CEQA Air Quality Significance Thresholds (March 2023) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

CONSTRUCTION EMISSIONS

Construction activities associated with the Project would result in emissions of VOCs, NOX, SOX, CO, PM10, and PM2.5. Construction-related emissions are expected from the following construction activities:

- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

ON-ROAD TRIPS

Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul trucks commuting to and from the site. The number of worker, vendor, and hauling trips are presented below in Table 1. Worker trips are based on CalEEMod defaults.

Table 1 Construction Trip Assumptions

Construction Activity	Worker Trips Per Day	Vendor Trips Per Day	Hauling Trips Per Day
Site Preparation	18	1	0

Grading	25	6	0
Building Construction	40	7	0
Paving	15	3	0
Architectural Coating	8	0	0

CONSTRUCTION DURATION

Construction is expected to begin in August 2025 and conclude in November 2026, lasting approximately fifteen months. The construction schedule utilized in the analysis, shown in Table 2 represents a "conservative" analysis scenario should construction occur any time after the respective days since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines.

Table 2 Construction Duration

Construction Activity	**Start Date**	**End Date**	**Days**
Site Preparation	8/1/2025	8/21/2025	15
Grading	8/22/2025	3/9/2026	142
Building Construction	3/10/2026	11/30/2026	190
Paving	8/25/2026	11/30/2026	70
Architectural Coating	8/25/2026	11/30/2026	70

CONSTRUCTION EQUIPMENT

Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 3 is assumed to operate up to a total of eight (8) hours per day (except as noted below), or more than two-thirds of the period during which construction activities are allowed pursuant to the City code. It should be noted that the Project Applicant has confirmed that the equipment list is reasonable for the Project's construction.

Table 3 Construction Equipment Assumptions

Activity	Equipment	Number	Hours per Day
Site Preparation	Crawler Tractor	3	8
	Tractors/Loaders/Backhoes	4	8
Grading	Crawler Tractors	2	8
	Excavators	3	8
	Graders	2	2
	Rubber Tired Dozers	1	8
	Scrapers	2	8

Building Construction	Cranes	1	8
	Forklifts	4	8
	Generator Sets	3	8
	Tractors/Loaders/Backhoes	3	8
	Welders	1	8
	Pavers	2	8
Paving	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

CONSTRUCTION EMISSIONS SUMMARY

IMPACTS WITHOUT MITIGATION

The estimated maximum daily construction emissions without mitigation are summarized in Table 4. Detailed construction model outputs are presented in the Air Quality Impact Analysis Appendix 4.1. Under the assumed scenarios, emissions resulting from the Project construction would not exceed thresholds established by the SCAQMD for emissions of any criteria pollutant. As such, construction impacts would be considered less-than-significant.

Table 4 OVERALL CONSTRUCTION EMISSIONS SUMMARY – WITHOUT MITIGATION

Pollutant Emissions (Pounds per Day) Activity	**VOC**	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Summer						
2025	4.14	37.59	34.11	0.06	7.83	4.52
2026	10.24	21.81	33.30	0.05	1.77	1.01
Winter						
2025	3.59	32.25	30.07	0.06	4.44	2.41
2026	10.19	29.76	30.89	0.06	4.31	2.29
Maximum Daily Emissions	**10.24**	**37.59**	**34.11**	**0.06**	**7.83**	**4.52**
SCQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

OPERATIONAL EMISSIONS

Operational activities associated with the Project would result in emissions of VOCs, NOX, SOX, CO, PM10, and PM2.5. Operational emissions are expected from the following primary sources:

- Mobile Source Emissions
- Area Source Emissions
- Energy Source Emissions
- Operational Equipment Source Emissions

OPERATIONAL EMISSIONS SUMMARY

CalEEMod utilizes summer and winter EMFAC2021 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. As such, operational activities for summer and winter scenarios are presented in Table 5. Detailed operational model outputs are presented in the Air Quality Impact Analysis Appendix 4.1. Project operational activities would not exceed the numerical thresholds of significance established by the SCAQMD for emissions of any criteria pollutant. As such, operational impacts would be considered less-than-significant.

TABLE 5: SUMMARY OF PEAK OPERATIONAL EMISSIONS

Pollutant Emissions (Pounds per Day) Activity	**VOC**	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Summer						
Mobile Source Emissions	2.07	3.01	25.09	20.07	5.35	1.40
Area Source Emissions	3.00	0.03	4.12	0.00	0.01	0.01
Energy Source Emissions	0.00	0.00	0.00	0.00	0.00	0.00
Operational Equipment Source Emissions	0.95	14.31	55.03	0.01	0.50	0.46
Total Maximum Daily Emissions	6.03	17.36	84.25	0.08	5.86	1.87
Existing Facility	-6.16	-19.25	-84.50	-0.09	-6.50	-2.10
Net New Total (Proposed - Existing)	**-0.14**	**-1.89**	**-0.26**	**-0.01**	**-0.64 -**	**-0.24**
SCQMD Thresholds	55	55	550	150	150	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**
Winter						
Mobile Source Emissions	1.73	3.27	16.77	0.06	5.35	1.40
Area Source Emissions	2.32	0.00	0.00	0.00	0.00	0.00
Energy Source Emissions	0.00	0.00	0.00	0.00	0.00	0.00
Operational Equipment Source Emissions	0.95	14.31	55.03	0.01	0.50	0.46
Total Maximum Daily Emissions	5.01	17.58	71.80	0.08	5.85	1.86
Existing Facility	-0.38	-1.88	-4.53	-0.01	-0.64	-0.24
Net New Total (Proposed - Existing)	**-0.38**	**-1.88**	**-4.53**	**-0.01**	**-0.64**	**-0.24**
SCQMD Thresholds	55	55	550	150	150	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

CUMULATIVE AIR QUALITY IMPACTS

There are a number of cumulative projects in the project area that have not yet been built or are currently under construction. Since the timing or sequencing of the cumulative projects is unknown, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. Further, cumulative projects include local development as

well as general growth within the project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered would cover an even larger area. The SCAQMD recommends using two different methodologies: (1) that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality; and (2) that a project's consistency with the current AQMP be used to determine its potential cumulative impacts.

Project Specific Impacts

The project area is out of attainment for ozone and in 2018 was out of attainment for PM10. Construction and operation of cumulative projects will further degrade the local air quality, as well as the air quality of the Salton Sea portion of the South Coast Air Basin. The greatest cumulative impact on the quality of regional air cell will be the incremental addition of pollutants mainly from increased traffic volumes from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of these projects. Air quality will be temporarily degraded during construction activities that occur separately or simultaneously. However, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant.

Project operations would generate emissions of VOC, NOx, ROG, CO, PM10, and PM2.5, which would not exceed the SCAQMD regional or local thresholds and would not be expected to result in ground level concentrations that exceed the NAAQS or CAAQS. Since the project would not introduce any substantial stationary sources of emissions, CO (Carbon Monoxide) is the benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. As indicated in the Air Quality Impact Analysis, no violations of the state and federal CO standards are projected to occur for the project, based on the magnitude of traffic the project is anticipated to create. Therefore, operation of the project would not result in a cumulatively considerable net increase for nonattainment of criteria pollutants or ozone precursors. As a result, the project would result in a less than significant cumulative impact for operational emissions.

Air Quality Compliance

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

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

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

policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

(1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

(2) Whether the project will exceed the assumptions in the AQMP in 2016 or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

Criteria 1 – Increase in the Frequency or Severity of Violations

Based on the air quality modeling analysis contained in the Air Quality Impact Analysis, short-term construction impacts will not result in significant impacts based on the SCAQMD regional and local thresholds of significance. The Air Quality Impact Analysis also found that long-term operations impacts will not result in significant impacts based on the SCAQMD local and regional thresholds of significance.

Therefore, the proposed project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP for the first criterion.

Criteria 2 – Exceed Assumptions in the AQMP?

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 2016-2040 Regional Transportation/Sustainable Communities Strategy prepared by SCAG (2016) includes chapters on: the challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These chapters currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA. For this project, the City Land Use Plan defines the assumptions that are represented in the AQMP.

The project site is currently designated as “Light Industrial ” on the County’s Land use map in the General Plan. The project proposes to develop the site with a “QCP Fabrication Facility.” Therefore, the proposed project would not result in an inconsistency with the current land use designation in the County’s General Plan. Therefore, 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. Based on the above, the proposed project will not result in a cumulative considerable net increase of any criteria pollutant. Therefore, a less than significant impact will occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) Less Than Significant Impact. The primary materials utilized in the QCP fabrication process includes cement and sand. Cement causes emissions, through two main factors: high-energy fuel combustion (roughly 1,400°C) and the chemical decomposition of limestone. Here are the key ways cement production causes air pollution:

- **Chemical Reaction :** During a process called calcination, raw limestone is heated to create lime, releasing carbon dioxide directly into the atmosphere, accounting for 50% of the industry's emissions.
- **Fossil Fuel Combustion :** (Not Applicable to Proposed Project).
- **Particulate Matter (Dust):** The mining, grinding, and handling of raw materials (limestone, shale) and the final product creates dust, which releases fine particles into the air.
- **Transportation and Processing:** The use of heavy machinery for moving materials and the operation of clinker coolers also contribute to greenhouse gases and other harmful emissions.

Key sources of pollution include dust emissions; greenhouse gases, particularly carbon dioxide; and the release of toxic substances such as heavy metals and particulate matter. These pollutants contribute to air, water, and soil degradation and are linked to severe health conditions in nearby populations, including respiratory disorders, cardiovascular diseases, and increased mortality rates.

The nearest sensitive receptors to the project site include the existing residential dwelling located beginning approximately 40 feet west and the existing residential subdivision located approximately 191 feet north of the Project site (within the City of Coachella).

R1: Location R1 represents the private residence at 85186 Corte del Roble (City of Coachella), approximately 191 feet north of the Project site. R1 is placed in the residence's outdoor living area (backyard) facing the Project site.

R2: Location R2 represents the private residence at 85467 54th Avenue, approximately 391 feet east of the Project site. Receiver R2 is placed at the façade facing the Project site.

R3: Location R3 represents the private residence at 54540 Shady Lane, approximately 720 feet east of the Project site. Receiver R3 is placed at the façade facing the Project site.

R4: Location R4 represents the existing noise sensitive residence at 85300 55th Avenue facing the Project site.

R5: Location R5 represents the existing noise sensitive residence at 54684 Harrison Street, approximately 621 feet southwest of the Project site. Receiver R5 is placed in the outdoor living area (backyard) facing the Project site.

R6: Location R6 represents the existing noise sensitive residence at 85265 54th Avenue, approximately 40 feet west of the Project site. Receiver R6 is placed in the outdoor living area (backyard) facing the Project site.

RECEIVER LOCATIONS



Subject Property Details Map

Vacant Lot
Southside of Avenue 54, east of Harrison Street
Thermal, California 92274
Project#: V24-4021

Nova Group

The Proposed 19.01 acre Project exceeds the five (5) acre limit that enable uses of the mass rate Localized Significance Threshold (LST) Look-Up Table. To determine if the Proposed Project has the potential to generate significant adverse localized air quality impacts, the Air Quality Impact Analysis modeled a maximum potential impact scenario that included all on-site Project-related stationary (area) sources and on-site Project-related mobile emissions. In order to account for on-site mobile emissions, under both options a trip length of 0.25 miles was used for both trucks and passenger cars to account for vehicle travel while on the Project site.

As shown below in Table 6, emissions would not exceed SCAQMD's localized significance thresholds at the maximally exposed receptors as a result of operational activities. was used. Based on the Project's size and proximity to existing housing, overall, the impacts will be less than significant.

Table 6 LOCALIZED SIGNIFICANCE SUMMARY PEAK OPERATIONS

Peak Operation	**CO**		**NO_2**	**PM10**	**PM2.5**
Averaging Time	1-Hour	8-Hour	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	3.28 E-02	2.26E-02	4.72E-03	0.17	0.14
Background Concentration A	1.1	0.08	0.38	n/a	n/a
Total Concentration	**1.13**	**0.82**	**0.004**	**0.17**	**0.14**
SCAQMD Localized Significance Threshold	20	9	0.18	2.5	2.5
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**

A Highest concentration from the last three years of available data.
Notes: PM10 and PM2.5 concentrations are expressed in µg/m3. All others are expressed in ppm.
Based on SCAQMD's LST Methodology, background concentrations are considered only for CO and NO2.

Health Impacts

As shown in Tables 3,4 and 5, construction and operation of the proposed Project will result in criteria emissions that are below the SCAQMD significance thresholds, and neither would violate any air quality standard or contribute substantially to an existing or projected air quality violation.

With today's technology, it is not scientifically possible to calculate the degree to which exposure to various levels of criteria pollutant emissions will impact an individual's health. There are several factors that make predicting a Project-specific numerical impact difficult:

- Not all individuals will be affected equally due to medical history. Some may have medical pre-dispositions and diet and exercise levels tend to vary across a population.
- Due to the dispersing nature of pollutants it is difficult to locate and identify which group of Individuals will be impacted, either directly or indirectly.
- There are currently no approved methodologies or studies to base assumptions on, such as baseline health levels or emission level-to-health risk ratios.

The potential impact of Project-generated air pollutant emissions at sensitive receptors has also been considered. Results of the LST analysis indicate that the Project will not exceed the SCAQMD

localized significance thresholds during construction. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations during Project construction. Additionally, the Project will not exceed the SCAQMD localized significance thresholds during operational activity. Further Project traffic would not create or result in a CO "hotspot." Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of Project operations.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

d) Less Than Significant Impact. The potential for the Project to generate objectionable odors has also been considered. Land uses generally associated with odor complaints include:

- Agricultural uses (livestock and farming);
- Wastewater treatment plants; • Food processing plants;
- Chemical plants; • Composting operations;
- Refineries;
- Landfills;
- Dairies; and
- Fiberglass molding facilities.

The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors and other emissions) associated with construction and operations activities of the proposed Project would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

CUMULATIVE IMPACTS

The Air Quality Impact Analysis shows that the CAAQS designates the Project site as nonattainment for O3 PM10, and PM2.5 while the NAAQS designates the Project site as nonattainment for O3 and PM2.5. 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. The analysis assumed that individual projects that do not generate operational or construction emissions exceeding the SCAQMD's thresholds would also not cause a cumulatively considerable increase in emissions for those pollutants for which SCAB 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 would be considered cumulatively considerable.

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

CONSTRUCTION IMPACTS

The Project-specific evaluation of emissions presented in the preceding analysis demonstrates that proposed Project construction-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, proposed Project construction-source emissions would be considered less than significant on a project-specific and cumulative basis.

OPERATIONAL IMPACTS

The Project-specific evaluation of emissions presented in the preceding analysis demonstrates that proposed Project operational-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, proposed Project operational-source emissions would be considered less than significant on a project-specific and cumulative basis.

BIOLOGICAL RESOURCES Would the project:				
7. Wildlife & Vegetation a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?	☐	☐	☒	☐
b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?	☐	☐	☒	☐
c) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	☐	☐	☐	☒
f) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

Source(s): GIS database, WRCMSHCP and/or CVMSHCP, On-site Inspection, Biological Resources Assessment Memorandum and Coachella Valley Multiple Species Habitat Conservation Plan Analysis

for the QCP Fabrication Facility Plot Plan Thermal, Riverside County, California, Biological Resources Technical Report, CADRE Environmental, October, 2024.

Findings of Fact:

a) Less Than Significant Impact. A biological resources technical report was prepared by CADRE Environmental, October, 2024 describes a detailed assessment of potential sensitive natural resources located within and/or immediately adjacent to the QCP Fabrication Facility project site (Project Site). The report has been prepared to support compliance with the Coachella Valley Multiple Species Habitat Conservation Plan and Natural Communities Conservation Plan(CVMSHCP) and California Environmental Quality Act (CEQA) including the environmental review process conducted by the County of Riverside Environmental Programs Division (EPD). As discussed below, the assessment included a thorough literature review, site reconnaissance characterizing existing conditions (including floral, faunal and dominant vegetation communities), impact analysis, and development of proposed mitigation & conservation measures to reduce impacts to a level of less than significant, as warranted.

The Project Site is located within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) planning boundary/fee area and outside of a designated conservation area, biological corridor or linkage area. The project applicant shall pay a local development mitigation fee established by the County of Riverside TLMA . The Project will have less than significant impacts.

Table 7 Project Site Vegetation Community Impacts

Vegetative Type	Total Acres	Permanent/Temporary Impact Acres
Agricultural	14.85	14.85
Disturbed	3.72	3.72
Ornamental	0.44	0.44
TOTALS	**19.01**	**19.01**

b) Less Than Significant Impact. The proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any plant or wildlife species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS). No native undisturbed suitable habitat or sensitive plant/wildlife species observations were documented within the Project Site. The Project Site is characterized as 19.01 -acres of fully disturbed agricultural land that has been planted with dates since the late 2000's. The project applicant shall pay CVMSHCP Local Development Mitigation fees as established and implemented by the County of Riverside TLMA . Impacts to sensitive species will be less than significant and no additional mitigation is required or proposed. Impacts to sensitive species will be less than significant and no additional mitigation is required or proposed.

c) Less Than Significant Impact. The proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any plant or wildlife species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS). No native undisturbed suitable habitat or sensitive plant/wildlife species observations were

documented within the Project Site. The Project Site is characterized as 19.01 -acres of fully disturbed agricultural land that has been planted with dates since the late 2000's. The project applicant shall pay CVMSHCP Local Development Mitigation fees as established and implemented by the County of Riverside TLMA . Impacts to sensitive species will be less than significant and no additional mitigation is required or proposed.

d) Less Than Significant Impact. The Project Site is not located within or adjacent to a CVMSHCP designated conservation area, biological corridor or linkage area. The Project Site does not represent a wildlife movement corridor or route between extensive open space habitats.

The Project Site possess vegetation expected to potentially provide nesting habitat for migratory birds protected under the CDFG Codes. Measures for potential direct/indirect impacts to bird nesting activity will require compliance with the CDFG Code Section 3503. Potential impacts nesting birds or raptors habitat would be avoided with compliance with the CDFG Code Section 3503.

e) No Impact. No riparian, sensitive or undisturbed native habitats were documented within the Project Site as outlined in Table 5, Project Site Vegetation Community Impacts. The Project Site is characterized as 19.01-acres of fully disturbed agricultural land that has been planted with dates since the late 2000's. Therefore, the proposed Project would not cause impacts on any riparian habitat or other sensitive natural community. No impacts would occur.

f) No Impact. No wetlands or jurisdictional resources regulated by the USACE or CDFW. According to the Biological Resources Assessment Memorandum and Coachella Valley Multiple Species Habitat Conservation Plan Analysis prepared for the Project site by CADRE Environmental, "no potentially jurisdictional drainage features are present on the project site" and "No riparian vegetation, water channels, or ponding water was observed during the reconnaissance survey". Therefore the proposed Project would have no impact on wetlands.

g) No Impact. Other than the ECVP MSHCP, which is addressed above, the only local policies or ordinances protecting biological resources within the Project area are Riverside County Ordinance No. 559 (Regulating the Removal of Trees) and the County's Oak Tree Management Guidelines. The Project site does not contain any trees aside from the agricultural date palms. Thus, because the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, no impact would occur as a result of implementation of the Project as proposed on the Project site.

INDIRECT IMPACTS

Potential indirect impacts include hydrological modification, discharges, lighting, and construction noise. Compliance with all the following land use adjacency guidelines will ensure that the proposed project will not result in significant indirect impacts to habitats and associated floral and faunal species adjacent to the Project Site.

The project site is not located in or adjacent to a designated CVMSHCP Conservation Area, Biological Corridor, or Linkage. Therefore, the CVMSHCP Land Use Adjacency Guidelines for indirect impacts do not apply to this project. Impacts to water quality would be less than significant during compliance with both construction and operation NPDES permit requirements.

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

Source(s): On-Site Inspection, Project Application Materials, (Phase I Cultural Resource Study), Brian F. Smith & Associates, December, 2024).

Findings of Fact:

a) Less Than Significant Impact. Based on the Riverside County General Plan, the Project site is not located in a Historic Preservation District. These sources did not indicate the presence of historic resources within the project. Based upon historic aerial photographs, the property was historically vacant and repeatedly cleared. Although no structures are visible within the property, the aerial photographs from 1953 to 1984 do illustrate that the northwest corner of the property contained trees and possibly a yard associated with a residence and ranch complex on the adjacent property to the west. Structures associated with this adjacent complex are first visible on the 1943 Coachella USGS Quadrangle. Subsequent photographs show the repeated clearing of the project property between 2006 and 2009 when agricultural rows are visible. By 2011, small palm trees are visible along the rows and subsequent photographs show the steady growth of the trees. Although a review of the maps and aerial photographs does not indicate the presence of any historic resources within the subject property, the absence of positive results does not necessarily indicate the absence of historic resources. When available, the records search results may still indicate the presence of recorded sites in the vicinity of the project or within the project itself. Less than significant impacts related to Historic Resources are anticipated.

b) **Less Than Significant Impact.** As discussed above in (Threshold 8.a), no historic resources are located on the Project site or have the potential to be impacted by the Project. Less than significant impacts related to Historic Resources are anticipated.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation	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): On-Site Inspection, Project Application Materials, (Phase I Cultural Resource Study), Brian F. Smith & Associates, December, 2024).

Findings of Fact:

a) Less Than Significant Impact with Mitigation Incorporated. The project site has been disturbed by grading and farming beginning in the 1950's. Historical Topographic Maps and Aerial Photographs indicated that there was a rural residential structure on the Project site from the 1930's to the early 1980's. A Cultural Resource Survey was prepared by Brian F. Smith & Associates in January, 2025 that included the project site. The survey did not identify any prehistoric cultural resources or isolates within the project area. The project site has been highly disturbed by agricultural

activities that have left virtually none of the ground surface undisturbed. Overall, the current study and previous research suggest the project area is highly disturbed with little likelihood for intact buried cultural resources.

However, because it remains unclear whether or not cultural resources have ever existed on the project site and due to the frequency of recorded cultural resources located near the project site, the

potential exists that previously undiscovered archaeological resources may exist within the area that may be exposed during the Project's ground-disturbing construction activities. Implementation of Mitigation Measure CUL-1 MM would reduce impacts to less than significant levels should inadvertent resources be discovered during construction ground disturbance activities. Mitigation Measure CUL-2 MM would create a monitoring program with sufficient detail, including onsite monitors, staff training, and procedures/processes for any inadvertent resources that may be discovered at the Project site. Thus, impacts would be reduced to less than significant levels with mitigation incorporated.

(b) Less Than Significant Impact with Mitigation Incorporated. As discussed above in Threshold 9.a), the potential exists that previously undiscovered archaeological resources may exist within the area that may be exposed during the Project's ground-disturbing construction activities. Implementation of Mitigation Measure CUL-1 MM and CUL-2 MM would reduce impacts to less than significant levels should inadvertent resources be discovered during construction ground disturbance activities. Thus, impacts would be reduced to less than significant levels with mitigation incorporated.

c) Less Than Significant Impact. The Project site does not contain any known human remains. The Project's mass grading and excavation activities would disturb the entire site and there is a remote potential that human remains may be unearthed during the Project's ground-disturbing construction activities. This same potential for the discovery of human remains occurs on nearly every construction site that disturbs an undeveloped ground surface. If human remains are found on the site, the developer/permit holder or any successor in interest is required by law to comply with State Health and Safety Code Section 7050.5. Compliance with State Health and Safety Code Section 7050.5, as required by law, would reduce impacts to human remains to less than significant levels. Nonetheless, Mitigation Measure CUL-2 MM is provided to further ensure compliance with the mandatory regulatory requirements.

Mitigation:

CUL-1 MM: Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A Cultural Resource Monitoring Plan shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.

CUL-2 MM: If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5. 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.

Monitoring:

CUL MM-A: In the event that previously unidentified cultural resources are discovered, the County Archaeologist shall review and approve the Research Design and Data Recovery Program.

CUL MM-B: Monitoring: Monitoring shall be required if human remains are found pursuant to California Public Resources Code Section 5097.98.

Level of Significance After Mitigation

Implementation of Mitigation Measures CUL-1 MM and CUL-2 MM would reduce all potential significant unavoidable impacts on cultural resources below a level of significance.

	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"), Project Application Materials, Vehicle Miles Traveled Analysis (VMT) & Energy Analyses prepared by Urban Crossroads (January, 2025).

Findings of Fact:

a) Less Than Significant Impact. The proposed Project will utilize energy resources during both construction and operational activities. Construction related energy demand comes from the operation of construction equipment and the manufacturing of construction materials. Operational energy demand primarily comes from building/site lighting, HVAC systems, and use of electricity and natural gas for commercial activities.

All development will be constructed in accordance with the Building Code, California Green Building Code, and Energy Code in effect at the time that development occurs, to ensure the most efficient construction/building technologies are used, which will benefit overall building operations, ensure energy efficiency and reduce wasteful and unnecessary consumption of energy resources. These requirements of law assure that future buildings on the site will not waste energy.

Construction: Electricity demand will be temporary, nominal, and will cease upon the completion of construction. Electricity will be supplied through existing power lines near the project site. Construction activities will require limited energy consumption and are not expected to have an adverse impact on available energy supplies and infrastructure. Natural gas typically is not consumed during construction.

CONSTRUCTION EQUIPMENT ELECTRICITY USAGE ESTIMATES

Electricity would be provided to the Project by Imperial Irrigation District (IID). IID's general service rate schedule was used to determine the Project's electrical usage. As of October 1, 2024, IID's general service rate is $0.12 per kilowatt hours (kWh) of electricity for commercial services (2). As shown on Table 8, the total electricity usage from on-site Project construction related activities is estimated to be approximately 31,504 kWh.

Table 8 PROJECT CONSTRUCTION ELECTRICITY USAGE

Land Use	Cost per kWh	Project Construction Electricity Usage
Manufacturing	$0.12	31,504 kWh
	CONSTRUCTION ELECTRICITY USAGE	**31,504**

CONSTRUCTION EQUIPMENT FUEL ESTIMATES

The aggregate fuel consumption rate for all equipment is estimated at 18.5 hp-hr-gal., obtained from California Air Resources Board (CARB) 2018 Emissions Factors Tables and cited fuel consumption rate factors presented in Table D-24 of the Moyer guidelines (3). For the purposes of this analysis, the calculations are based on all construction equipment being diesel-powered which is standard practice consistent with industry standards. Diesel fuel would be supplied by existing commercial fuel providers serving the City and region. Project construction activities would consume an estimated 75,917 gallons of diesel fuel.

CONSTRUCTION WORKER FUEL ESTIMATES

It is assumed that 50% of all construction worker trips are from light-duty-auto vehicles (LDA), 25% are from light-duty-trucks (LDT11), and 25% are from light-duty-trucks (LDT22). Data regarding Project related construction worker trips were based on CalEEMod 2022 model defaults utilized within the AQIA. Vehicle fuel efficiencies for LDAs were estimated using information generated within the 2021 version of the EMFAC developed by the CARB. It is estimated that 8,773 gallons of fuel (gasoline) will be consumed related to construction worker trips over the course of the Project construction period.

CONSTRUCTION VENDOR/HAULING FUEL ESTIMATES

It is assumed that 50% of all vendor trips are from Medium-Heavy-Duty-Trucks (MHDT), 50% are from Heavy-Heavy-Duty Trucks (HHDT), and 100% of hauling trips are HHDT. These assumptions are consistent with the CalEEMod 2022 defaults utilized within the within the AQIA. Vehicle fuel efficiencies for MHDTs and HHDTs were estimated using information generated within EMFAC2021. The energy analysis estimated fuel economy of MHDTs and HHDTs accessing the Project site. Based on fuel consumption, construction trips will total approximately 3,893 gallons of fuel (diesel) over the course of the Project construction period.

TRANSPORTATION ENERGY DEMANDS

Energy that would be consumed by Project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the Project site. Table 9 presents the estimated annual fuel consumption from project-generated traffic.

Table 9 PROJECT-GENERATED TRAFFIC ANNUAL FUEL CONSUMPTION

	Annual VMT	Estimated Annual Fuel Consumption (gallons)
TOTAL (ALL VEHICLES)	**1,423,186**	**66,950**
EXISTING	*1,830,675*	*84,274*
NET TOTAL (ALL VEHICLES)	***-407,489***	***-17,324***

The proposed project would have a less than significant impact directly, indirectly, or cumulatively related to electricity, natural gas, or transportation energy supply and infrastructure capacity energy resources during construction. No mitigation is required.

Operation:

OPERATIONAL EQUIPMENT ENERGY DEMANDS

Based on data provided by the Project applicant, in order to support operational activities at the facility, it is estimated that seven diesel forklifts and three propane forklifts would be utilized. It should be noted that this equipment is in use at the current existing facility and would be utilized at the proposed facility as well. As such, the implementation of the proposed Project would not result in a net increase in fuel consumption from operational equipment.

FACILITY ENERGY DEMANDS

Project building operations and Project site maintenance activities would result in the consumption of electricity. Based on information provided by the Project applicant, the proposed Project will utilize on-site renewable energy to satisfy 100% of the Project's electrical demand. Additionally, the proposed Project would not utilize natural gas for the building envelope. Table 9 presents the electricity demand associated with the proposed Project as well as the existing facility, which was estimated based on CalEEMod defaults. As shown in Table 10, implementation of the proposed Project would be expected to result in a net reduction of approximately 909,669 kWh per year.

Table 10 ANNUAL OPERATIONAL ENERGY DEMAND SUMMARY

Land Use	Natural Gas Demand (kBTU/year)	Electricity Demand (kWh/year)
Project	0	0
TOTAL PROJECT ENERGY DEMAND	0	0
EXISTING	*0*	*906,669*
TOTAL PROJECT ENERGY DEMAND	**0**	***-909,669***

It should be noted that the proposed project must comply with all Federal, State, and County requirements related to the consumption of electricity, including California Code of Regulations Title 24, Part 6 & 11 energy efficiency standards for commercial/industrial buildings. These standards require energy efficiency measures to be incorporated into the proposed buildings to include photovoltaic solar panels on the roofs. It is anticipated the proposed project will be designed and built to minimize electricity use, and that existing and planned electricity supplies would be sufficient to

support the projected electricity demand. The proposed project would have a less than significant impact directly, indirectly, or cumulatively related to Electricity, natural gas, or transportation energy supply and infrastructure capacity energy resources during operation. No mitigation is required.

As established by the County of Riverside, the Proposed Project is considered to be a "small project" that may be presumed to result in a less than significant VMT impact. According to a Vehicle Miles Traveled Analysis (VMT) prepared by Urban Crossroads (December, 2024), the proposed project is forecast to generate approximately 210 daily trips, including 15 trips during the AM peak hour and 9 trips during the PM peak hour. The proposed project is forecast to generate fewer than 50 trips during the weekday AM and PM peak hours. Therefore, further Level of Service analysis does not appear to be warranted based on the County's TA Guidelines. The proposed QCP Fabrication Facility is forecast to generate approximately 24 daily peak hour trips, which satisfies the small project screening criteria for projects. Therefore, it is reasonable to presume the proposed project would result in a less than significant VMT impact based on the State-recommended screening criteria guidance established by the County of Riverside.

The Imperial Irrigation District (IID) has indicated that they have existing facilities at the site. All work would occur in existing disturbed locations on site, and would not impact energy facilities in the area. Therefore the proposed Project will have a less than significant impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) No Impact. The applicable renewable energy or energy efficiency plan for the project site is the Riverside County Climate Action Plan ("CAP"). The proposed project would comply with the Riverside County Climate Action Plan ("CAP"), through installation of photovoltaic solar panels, which is also a regulatory requirement detailed in the Title 24 Part 6 energy efficiency standards for office, commercial and warehouse buildings. The proposed project would not conflict with any state or local plan for renewable energy or energy efficiency based on the information provided above. Adherence to the applicable state standards enforced by IID and the Gas Company will ensure the development of the Project is consistent with current energy standards and conservation goals, The proposed project would have no impact directly, indirectly, or cumulatively related to any state or local plan for renewable energy or energy efficiency. No mitigation is required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Riverside County General Plan Figure S-2 "Earthquake Fault Study Zones," GIS database, Geologist Comments, Geotechnical Investigation, Proposed QCP Facility, Sladden Engineering (January, 2025).

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

Findings of Fact:

a) Less Than Significant Impact. The subject site is located in an active seismic zone and will likely experience strong seismic shaking during the design life of the proposed project. In general, the intensity of ground shaking will depend on several factors including; the distance to the earthquake focus, the earthquake magnitude, the response characteristics of the underlying materials, and the quality and type of construction. There are no known active or potentially active faults on or trending toward the Project site and the Project site is not located within a mapped Alquist-Priolo Earthquake Fault Zone (RCIT, 2020; Riverside County, 2015a, Figure S-2).

According to the Geotechnical Investigation, Surface rupture is expected to occur along preexisting, known active fault traces. However, surface rupture could potentially splay or step from known active faults or rupture along unidentified traces. Based on the investigation's review of Rogers (1965), Jennings (1994), and CDOC (2024) known active faults are not mapped on the site. In addition, no signs of active surface faulting were observed during the investigation's review of non-stereo digitized photographs of the site and site vicinity (Google Earth, 2024). Finally, no signs of active surface fault rupture or secondary seismic effects (lateral spreading, lurching etc.) were identified during the investigation. Therefore, it is the investigation's opinion that risks associated with primary surface ground rupture should be considered "low" as no signs of active surface faulting was observed and no signs of active surface fault rupture or secondary seismic effects were observed. Because the Project site is not located on a known fault and no known faults are trending towards the Project site, there is a less than significant impact for the Project to directly or indirectly expose people or structures to substantial adverse effects related to ground rupture of a known earthquake fault.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Riverside County General Plan Figure S-3 "Generalized Liquefaction," Geotechnical Investigation, Proposed QCP Facility, Sladden Engineering (January, 2025).

Findings of Fact:

(a) Less Than Significant Impact with Mitigation Incorporated. Liquefaction is the process in which loose, saturated granular soil loses strength as a result of cyclic loading. The strength loss is a result of a decrease in granular sand volume and a positive increase in pore pressures. Generally, liquefaction can occur if all of the following conditions apply; liquefaction-susceptible soil, groundwater within a depth of 50 feet or less, and strong seismic shaking.

Riverside County has delineated areas of known and suspected liquefaction hazard. In general, the valley floor of the alluvial fans on the valley's eastern margin are susceptible to liquefaction hazard. The County's General Plan Figure S-3, 4, "Generalized Liquefaction," shows that the project site is within an area that has a high potential for liquefaction. In addition, the Riverside County Land Information System website shows that the project site is in an area with a high potential for liquefaction.

The Geotechnical Investigation by Sladden Engineering performed seismic settlement calculations utilizing a magnitude of 7.45 (USGS, 2023) and a site-specific peak ground acceleration of 0.792g (PGAM). The anticipated high groundwater depth was estimated to be approximately 10 feet bgs. Screening of liquefaction susceptible fine-grained soil was completed in accordance with Bray and Sancio (2006). A review of the seismically induced settlement in the top 50 feet of the soil profile for BH-1 and BH-3 revealed total settlements of approximately 4.70 inches for BH-1 and a composite bore of BH-3 below 40 feet and #1 of 4.40 inches. Based on the current depth to groundwater and the generally uniform soil conditions underlying the site, differential seismic settlements are expected to be less than 2 inches over a horizontal distance of approximately 100 feet.

As discussed in Threshold 11(a), there are no known or potentially active faults trending toward or through the site and the potential for damage due to direct fault rupture is considered low. The site is located in an area of high regional seismicity and the San Andreas Fault is located 3.6 miles north of the site (Google Earth Pro, 2021; RCIT, 2021). Ground shaking originating from earthquakes along other active faults in the region is expected to induce lower accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. The design and construction of the Project will be in conformance with the latest Building Code provisions for earthquake design is expected to provide adequate attenuation of any ground-shaking hazards, including, liquefaction hazards that are typical to southern California. Impacts to seismic related ground failure would be less than significant with GEO-1 MM incorporated, including recommendations summarized in Table 11 (below).

Mitigation:

GEO-1 MM All earthwork including excavation, backfill, and preparation of the primary foundation and/or slab bearing soil should be performed in accordance with the geotechnical recommendations presented in the Sladden Engineering report and portions of the local regulatory requirements, as applicable. All earthwork shall be performed under the observation and testing of a qualified soil engineer. The following geotechnical engineering recommendations for the proposed project are based on observations from the field investigation program, laboratory testing, and geotechnical engineering analyses.

Table 11 Summary of Recommendations

Remedial Grading	Over-excavation and re-compaction within the building envelope and extending laterally for 5 feet beyond the building limits where possible and to a minimum of 5 feet below existing grade or 4 feet below the bottom of the footings, whichever is deeper.
Native Import Engineered Fill	Place in thin lifts not exceeding 6 inches in a loose condition, at near optimum moisture content and compact to a minimum of 90 percent relative compaction.
Asphalt Concrete Sections	Compact the top 12 inches to at least 95 percent compaction at near optimum moisture content.

GEO-2 MM. In addition to GEO-1 MM (above), including specific project requirements including Stripping, Preparation of the Building Areas, Compaction and Shrinkage and Subsidence, the project shall be required to comply with standard grading conditions. Also, prior to placement of fill, existing undocumented fill, soil, colluviums, and loose fan deposits shall be over excavated to firm, moist, fan materials or un-weathered bedrock. Oversized material shall be placed in conformance with the

Uniform Building Code. Earthwork shall be performed under the observation and testing of a qualified soil engineer. This includes the following:

- The Project is required by law to comply with the California Building Standards Code which addresses construction standards including those related to geologic and soil conditions.

- As a standard condition of Project approval, the Project shall be required to comply with the site-specific recommendations contained in the geotechnical investigation prepared for the Project site. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics.

Monitoring:

GEO-MM A: The design and construction of the Project will be in monitored by the Project Geotechnical consultant and Riverside County TLMA (Building and Safety Division).

GEOL-MM B: The grading and placement of fill during construction of the Project will be monitored by the Riverside County TLMA (Building and Safety Division).

Level of Significance After Mitigation

Implementation of Mitigation Measures GEO-1 MM and GEO-2 MM would reduce all potential significant unavoidable impacts on geology and soils below a level of significance.

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

Source(s): Riverside County General Plan Figure S-4 "Earthquake-Induced Slope Instability Map," and Figures S-13 through S-21 (showing General Ground Shaking Risk), Geotechnical Investigation, Proposed QCP Fabrication Facility, Sladden Engineering (January, 2025).
Findings of Fact:

a) Less Than Significant Impact. The site has been subjected to past ground shaking by faults that traverse through the region. Strong seismic shaking from nearby active faults is expected to produce strong seismic shaking during the design life of the proposed project. As discussed in Threshold 11(a), there are no known or potentially active faults trending toward or through the site and the potential for damage due to direct fault rupture is considered low. The site is located in an area of high regional seismicity and the San Jacinto fault is located approximately 3.6 miles north of the site (Google Earth Pro, 2021; RCIT, 2021). Ground shaking originating from earthquakes along other active faults in the region is expected to induce lower accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. The design of the proposed construction of the Project will be in conformance with the latest California Building Code provisions for earthquake design as well as recommendations summarized in Table 6 (GEO-1 MM), subject to County review. Impacts to seismic related ground shaking 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
14. Landslide Risk a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?	☐	☐	☐	☒

Source(s): On-site Inspection, Riverside County General Plan Figure S-5 "Regions Underlain by Steep Slope," Geotechnical Investigation, Proposed QCP Fabrication Facility, Sladden Engineering (January, 2025).

Findings of Fact:

a) No Impact. The Project site is located on the Coachella Valley floor. It predominantly consists of sand and is surrounded by relatively flat terrain. The nearest hillsides slope of the Santa Rosa Mountains are approximately 5.25 miles southwest of the subject property. Slope instability in the form of landslides and rock falls were not observed at or near the subject site. The site is situated on relatively flat ground and is not located immediately adjacent to any slopes. As such, risks associated with slope instability (landslides, mass wasting, and rock falls) are considered "negligible". Due to distance from the nearest hillside, no impacts associated with landslides will occur.

Mitigation: No mitigation is required.
Monitoring: No monitoring is required.

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

Source(s): Riverside County General Plan Figure S-7 "Documented Subsidence Areas Map," Geotechnical Investigation, Proposed QCP Fabrication Facility, Sladden Engineering (January, 2025).
Findings of Fact:

a) Less Than Significant Impact with Mitigation Incorporated. Land subsidence can occur in valleys where aquifer systems have been subjected to extensive groundwater pumping, such that groundwater pumping exceeds groundwater recharge. Generally, pore water reduction can result in a rearrangement of skeletal grains and could result in elastic (recoverable) or inelastic (unrecoverable) deformation of an aquifer system. The General Plan shows that the site is located in an area of active subsidence. As with seismic-related ground failure, including liquefaction described above under 12, the design and construction of the Project will be in conformance with the latest Building Code provisions for earthquake design is expected to provide adequate attenuation of any ground failure hazards. Impacts to seismic related ground failure would be less than significant with GEO-1 MM and GEO-2 MM incorporated.

Mitigation:

GEO-1 MM and GEO-2 MM.

Monitoring:

GEO-MM A and GEO-MM B.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
16. Other Geologic Hazards a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?	☐	☐	☐	☒

Source(s): On-site Inspection, Project Application Materials, Geotechnical Investigation, Proposed QCP Facility, Sladden Engineering (January, 2025).

Findings of Fact:

a) No Impact. Because the site is situated at an inland location and is not immediately adjacent to any impounded bodies of water, risks associated with tsunamis and seiches are considered "negligible". With respect to seiches, the nearest body of water to the Project site is the Salton Sea, located approximately 9.8 miles southeast of the Project site (Google Earth Pro, 2021). No steep hillsides subject to mudflow and no volcanoes are located on or near the Project site (Riverside County, 2015a, Figure S-5; Riverside County, 2016a, Figures 14 and 15).. Therefore, there is no potential for the Project to be subject to hazards associated with seiches, mudflows, and/or volcanic hazards. No impacts would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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): Riv. Co. 800-Scale Slope Maps, Project Application Materials, Slope Stability Report, Geotechnical Investigation, Proposed QCP Facility, Sladden Engineering (January, 2025).

Findings of Fact:

a) Less Than Significant Impact. The Project site is extremely level with topography descending gradually from northwest to southeast at an elevations of approximately -90 feet. Grading would occur over the entire Project site and after grading, elevations would vary across the site between -88 to -86 feet Average Mean Sea Level (AMSL). Impacts resulting in topographic changes would be less than significant.

b) Less Than Significant Impact. The Project site is extremely level with topography descending gradually from northwest to southeast at an elevations of approximately -90 feet. Approximately three (3) feet slopes will be created on the Projects southern border for the retention basin. The slopes would be engineered for long-term stability and would be required to be constructed in accordance with the site-specific recommendations of the Project's geotechnical investigation. The proposed grading plan and the creation of manufactured slopes on the Project site would result in less-than-significant impacts to geology and soils because the slopes would be stable and not lead to any geologic or soil hazard. As a standard condition of Project approval, the Project would be required to comply with the site-specific recommendations contained in the geotechnical investigation for the Project site, including recommendations related to site preparation, soil compaction, and

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

manufactured slope design that would minimize potential hazards associated with manufactured slope failure. As such, the Project would not create a substantial adverse effect associated with changes in topography nor create cut or fill slopes greater than 2:1 or higher than 10 feet. Impacts would be less than significant.

c) No Impact. The Project site does not contain any operational subsurface sewage disposal systems under existing conditions. The Project site does not serve as a leach field for any off-site properties and has no potential to affect or negate operating subsurface sewage disposal systems. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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, Project Application Materials, On-site Inspection, Geotechnical Investigation, Proposed QCP Facility, Sladden Engineering (January, 2025).

Findings of Fact:

a) Less Than Significant Impact. No signs of flooding or erosion were observed during the Geotechnical Investigation. Development of the Project site has the potential to result in the erosion of soils during site preparation, grading, and building construction. However, the applicant will be required to adhere to erosion control measures imposed by the County of Riverside through grading and building permit regulations, including adherence to SCAQMD Rule 403.1, that requires a fugitive dust control plan. All grading activities would require grading permits from the TLMA Building Division and would be required to comply with the standards imposed by the County to limit potential erosion impacts. At buildout, there would be a low potential for soil erosion due to the predominantly level topography and the construction of buildings, impervious parking lots and stabilized landscaped areas. Impacts would less than significant.

b) Less Than Significant Impact. Expansive soils typically contain large amounts of clay that expand when water is absorbed and shrink when they dry. Generally, the near-surface soil consists of silty sand (SM). Based on the Geotechnical Investigation's results of laboratory testing (EI=0), the materials underlying the site are considered to have a "negligible" expansion potential. The recommended remedial grading will result in substantial mixing and blending of the surface soil. The expansion potential of the subsurface soil should be reevaluated after grading. Therefore, less than significant impacts associated with expansive soils will occur.

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

c) No Impact. Currently, the site is farmed and located in an area served by existing sewage infrastructure (existing 12-inch line in 54th Avenue). Additionally, Sladden Engineering (Sladden) undertook a field exploration and percolation test to determine the Project site's capacity for onsite wastewater disposal. Based on the field exploration and testing, it is Sladden's opinion that leach lines may be designed using an intermediate application rate of 55 square feet per 100 gallons of septic tank capacity. It is recommended that a representative of Sladden Engineering be allowed to observe the leach line trenches to verify that the leach lines extend into more permeable sandy soil layers. Based on the data presented in the report and using the recommendations set forth, it is the judgment of the engineer that there should be sufficient area for the new structures and individual sewage disposal systems that will meet the current codes and standards of the health department.

In any case, the Project's wastewater demand would be accommodated by connections to existing wastewater infrastructure. As such, the project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Riverside County General Plan Figure S-8 "Wind Erosion Susceptibility Map," Ord. No. 460, Article XV & Ord. No. 484

Findings of Fact:

a) Less Than Significant Impact. According to the Riverside County General Plan, the Project site is located in an area with a "High" susceptibility to wind erosion (Riverside County, 2015a, Figure S-8). However, as the Project site is graded flat and compacted, during construction there would be no existing vegetative cover would be removed from the subject property. Soils would be exposed, and the potential for wind-induced erosion and blowsand would increase as compared to existing conditions. The Project would be required to comply with SCAQMD Rule 403 that requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth-moving, grading, and construction equipment travel on unpaved roads. Following development of the Project, soils on the Project site would be covered with impervious surfaces and landscaping and no longer be as exposed to wind as it is under existing conditions; therefore, wind erosion and loss of topsoil under long-term conditions would be substantially reduced as compared to existing conditions. With mandatory compliance to Rule 403 regulatory requirements, the potential for the Project to result in an increase in wind erosion and blowsand, either on- or off-site, would be less than significant.

Applicable Regulatory Requirements

- The Project is required to comply with the provisions of the SCAQMD Rule 403 "Fugitive Dust." Rule 403 requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth moving, grading, and construction equipment travel on unpaved roads. To comply with Rule 403, and prior to grading permit issuance, the County of Riverside shall verify that

notes are specified on the Project's grading plans requiring Rule 403 compliance. Project construction contractors would be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. To comply with Rule 403:

- In order to limit fugitive dust emissions, all clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines.
- The construction contractor(s) shall ensure that all disturbed unpaved roads and disturbed areas within the Project site are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three (3) times a day, preferably in the mid-morning, afternoon, and after work is done for the day.
- The construction contractor(s) shall ensure that traffic speeds on unpaved roads and the Project site area are reduced to 15 miles per hour or less.

- As a standard condition of Project approval, the Project will be required to comply with the site-specific recommendations contained in the geotechnical investigation prepared for the Project site by Sladden Engineering dated January 2, 2025 which are included within the Sladden report. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Riverside County General Plan, Riverside County Climate Action Plan ("CAP"), Project California Emissions Estimator Model (CalEEMod), Greenhouse Gas Analysis, Urban Crossroads, (January, 2025).

Project Requirements

The proposed Project would be required to comply with regulations imposed by the State of California, the South Coast Air Quality Management District (SCAQMD), and the County of Riverside aimed at the reduction of air pollutant emissions. Those that are directly and indirectly applicable to the Project and that would assist in the reduction of GHG emissions include:

- Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32).
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (Senate Bill [SB] 375).
- Pavley Fuel Efficiency Standards (AB 1493). Establishes fuel efficiency ratings for new

vehicles.
- California Building Code (Title 24 California Code of Regulations [CCR]). Establishes energy efficiency requirements for new construction.
- Appliance Energy Efficiency Standards (Title 20 CCR). Establishes energy efficiency Requirements for appliances).
- Low Carbon Fuel Standard (LCFS). Requires carbon content of fuel sold in California to be 10 percent (%) less by 2020.
- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions.
- Renewable Portfolio Standards (RPS). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20% by 2010 and 33% by 2020. SB 350 mandated a 50% RPS by 2030. SB 100 increased the RPS requirements to 60% by 2030 with new interim targets of 44% by 2024 and 52% by 2027.
- California Global Warming Solutions Act of 2006 (SB 32). Requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15.

Promulgated regulations that would affect the Project's emissions are accounted for in the proposed Project's GHG calculations provided in Greenhouse Gas Analysis prepared Urban Crossroads. In particular, AB 1493, LCFS, and RPS are accounted for in the Project's emission calculations.

GHG Thresholds

On December 5, 2008, the SCAQMD formally adopted a greenhouse gas significance threshold of 10,000 MTCO2e/yr that only applies to industrial uses' stationary sources where SCAQMD is the lead agency (SCAQMD Resolution No. 08-35). This threshold was adopted based upon an October 2008 staff report and draft interim guidance document that also recommended a threshold for all projects using a tiered approach.

It was recommended by SCAQMD staff that a project's greenhouse gas emissions would be considered significant if it could not comply with at least one of the following "tiered" tests:

- Tier 1: Is there an applicable exemption?
- Tier 2: Is the project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32?
- Tier 3: Is the project below an absolute threshold (10,000 MTCO2e/year for industrial projects; 3,000 MTCO2e/year for residential and commercial projects)?
- Tier 4: Is the project below a (yet to be set) performance threshold?
- Tier 5: Would the project achieve a screening level with off-site mitigation?

Findings of Fact:

a) Less Than Significant Impact. CalEEMod was used to quantify GHG emissions associated with the project. The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available at the time of this report has been utilized in this analysis. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures . Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity are provided in Appendix 4.1 of the Greenhouse Gas Analysis

prepared by Urban Crossroads. CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water, and refrigerants.

Construction Emissions

Project construction activities would generate CO2 and CH4 emissions. The QCP Manufacturing Facility Air Quality Impact Analysis (AQIA) report contains detailed information regarding Project construction activities. As discussed in the AQIA, construction-related emissions are expected from the following activities:

- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

CONSTRUCTION DURATION

Construction is expected to begin in August 2025 and conclude in November 2026, lasting approximately fifteen months. The construction schedule utilized in the analysis, shown in Table 12 represents a "conservative" analysis scenario should construction occur any time after the respective days since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines.

Table 12 Construction Duration

Construction Activity	Start Date	End Date	Days
Site Preparation	8/1/2025	8/21/2025	15
Grading	8/22/2025	3/9/2026	142
Building Construction	3/10/2026	11/30/2026	190
Paving	8/25/2026	11/30/2026	70
Architectural Coating	8/25/2026	11/30/2026	70

CONSTRUCTION EQUIPMENT

Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 13 is assumed to operate up to a total of eight (8) hours per day (except as noted below), or more than two-thirds of the period during which construction activities are allowed pursuant to the City code. It should be noted that the Project Applicant has confirmed that the equipment list is reasonable for the Project's construction.

Table 13 Construction Equipment Assumptions

Activity	Equipment	Number	Hours per Day

Site Preparation	Crawler Tractor Tractors/Loaders/Backhoes	3 4	8 8
Grading	Crawler Tractors Excavators Graders Rubber Tired Dozers Scrapers	2 3 2 1 2	8 8 2 8 8
Building Construction	Cranes Forklifts Generator Sets Tractors/Loaders/Backhoes Welders Pavers	1 4 3 3 1 2	8 8 8 8 8 8
Paving	Paving Equipment Rollers	2 2	8 8
Architectural Coating	Air Compressors	1	8

CONSTRUCTION EMISSIONS SUMMARY

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 10.

Construction activities will result in short-term GHG emissions associated with operation of construction equipment, employee commute, material hauling, and other ground disturbing activities. As shown in Table 14, the Project will generate 892.43 metric tons of CO2e during the 15-month construction period. There are currently no construction related GHG emission thresholds for projects of this nature. To determine if construction emissions will result in a cumulative considerable impact, buildout GHG emissions were amortized over a 30-year period and added to annual operational emissions to be compared to applicable GHG thresholds (see Table 13, below).

Table 14 AMORTIZED ANNUAL CONSTRUCTION EMISSIONS

Emissions (Metric Tons Per Year)	**CO2**	**CH4**	**N2O**	**Refrigerants**	**Total CO2e**
Year					
2025	343.10	0.01	0.00	0.04	344.75
2026	544.24	0.02	0.01	0.12	547.67
Total GHG Emissions	887.34	0.03	0.01	0.16	892.43
Amortized Construction Emissions	**29.58**	**0.00**	**0.00**	**0 0.01**	**29.75**

OPERATIONAL EMISSIONS

Operational activities associated with the Project would result in emissions of CO2, CH4, N2O, and Refrigerant emissions from the following primary sources:

- Mobile Source Emissions
- Area Source Emissions
- Energy Source Emissions
- Water Supply, Treatment, and Distribution
- Solid Waste

Mobile Sources: GHG emissions will also result from mobile sources associated with the project, which include the typical daily operation of motor vehicles by employees and visitors. Project mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the project on peak hour traffic volumes and traffic operations in the local vicinity.

Area Sources: Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the developed site.

Energy Sources: GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions.

Water Supply, Treatment and Distribution: Indirect GHG emissions result from the production of electricity used to convey, treat and distribute water and wastewater. The amount of electricity required to convey, treat and distribute water depends on the volume of water as well as the sources of the water.

Solid Wastes: The proposed land uses will result in the generation and disposal of solid waste. A large percentage of this waste will be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed project were calculated by the CalEEMod model using default parameters

EMISSIONS SUMMARY

EXISTING PROJECT SITE GREENHOUSE GAS EMISSIONS

As noted previously, the Project proposes to relocate the existing manufacturing facility from the City of Norco to the unincorporated community of Thermal, and it is anticipated that operations would not differ significantly at the new facility. The estimated operation-source emissions from the existing facility are summarized on Table 15. Detailed operation model outputs are presented in Appendix 3.1. of the Greenhouse Gas Analysis prepared by Urban Crossroads.

TABLE 15: GHG EMISSIONS FROM EXISTING DEVELOPMENT

Emissions (Metric Tons Per Year)	**CO2**	**CH4**	**N2O**	**Refrigerants**	**Total CO2e**
Emissions Source					
Mobile Source	29.58	0.00	0.00	0.01	29.75
Area Source	599.03	0.01	0.04	0.93	611.51
Energy Source	1.38	0.00	0.00	0	1.39
Water Usage	21.73	0.00	0.00	0	0.00
Waste	21.73	0.71	0.02	0	44.71
Refrigeration	10.48	1.05	0	0	36.68
On-Site Equipment	0	0	0	0	1.47
Total CO2e (All Sources)					**1,018.61**

The estimated Project-related GHG emissions from the proposed Project are summarized in Table 15. Detailed operation model outputs for the Project are presented in Appendix 4.1 of the Greenhouse Gas Analysis prepared by Urban Crossroad. As shown in Table 16, construction and operation of the Project would result in a reduction of approximately 492.43 MTCO2e/yr.

TABLE 16: PROJECT GHG EMISSIONS

Emissions (Metric Tons Per Year)	**CO2**	**CH4**	**N2O**	**Refrigerants**	**Total CO2e**
Annual construction-related emissions amortized over 30 years	29.58	0.00	0.00	0 0.01	29.75
Mobile Source	599.03	0.01	0.04	0.93	611.51
Area Source	1.38	0.00	0.00	0	1.39
Energy Source	0	0.00	0.00	0	0.00
Water Usage	21.73	0.71	0.02	0	44.71
Waste	10.48	1.05	0	0	36.68
Refrigeration	0	0	0	147	147
On-Site Equipment	292	0	0	0.00	293.11
Total CO2e (All Sources)					**1,018.61**

Existing					-1,511.04
Net Emissions (Proposed – Existing)					**-492.43**

SMALL PROJECTS SCREENING

The County Guidelines list two types of screening criteria that may apply to "small projects." The first is a vehicle trip threshold of 110 trips per day. Based on the Quick Crete Products (QCP) Trip Generation Assessment (Urban Crossroads, December 2024), the Project is estimated to generate 210 vehicle trip-ends per day, which exceeds the 110 daily trip threshold.

Additionally, County Guidelines identifies that land use projects estimated to generate greenhouse gas (GHG) emissions below 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO2e) per year are also anticipated to result in a less than significant VMT impact.

Consistent with the QCP Manufacturing Facility Greenhouse Gas Analysis (Urban Crossroads, January 2025), the Project is forecast to generate a net reduction of 492.43 MTCO2e per year, which would not exceed the 3,000 MTCO2e threshold. Results of the Greenhouse Gas Analysis can be found in Table 12. Thus, Small Projects screening criteria is met and a less than significant impact with respect to GHG emissions applies. No mitigation is required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) Less Than Significant Impact: As previously stated, pursuant to Section 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the Project's consistency with the 2022 Scoping Plan is discussed below. It should be noted that the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary since both of these plans have been superseded by the 2022 Scoping Plan. For reasons outlined herein, the proposed Project would result in a less than significant impact with respect to GHG emissions conflicting with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

2022 SCOPING PLAN CONSISTENCY

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, Off-Road Zero-Emission Targeted Manufacturer Rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. As such, the Project would be consistent with the 2022 Scoping Plan.

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

RIVERSIDE COUNTY CLIMATE ACTION PLAN

The County of Riverside has prepared and adopted Climate Action Plan (CAP) as a roadmap for achieving community-wide greenhouse gas emissions reductions. The CAP quantifies emissions from the build-out of the proposed plan and includes additional policies and implementation actions to help Coachella further reduce emissions. It also includes strategies to protect public health and make the community more resilient to climate change. Riverside County's CAP is designed to provide clear policy guidance to the staff and decision-makers on how to reduce greenhouse gas emissions. It identifies a pathway to reduce emissions within a range of voluntary, state-level emissions reduction targets. This path includes strategies for improving connectivity and land use patterns, transportation modes and systems, incorporating energy efficiency standards, increasing the County's renewable energy supply, and reducing waste and consumption. By providing an emissions inventory, emissions targets, and strategies for reducing greenhouse gas emissions, the County of Riverside has established a framework evaluating and mitigating greenhouse gas emissions. Part of these emissions reductions will need to be achieved through better environmental performance of new development.

At Project buildout, the Project's total annual GHG emissions would not potentially exceed the Riverside County CAP's annual GHG emissions threshold of 10,000 MTCO2e. With implementation of Project design features, mitigation and adherence to applicable regulations, the Project would not cause a significant impact due to a conflict with the County's CAP and impacts related to GHG emissions would not be cumulatively considerable basis. Project impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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, Phase I ESA, Nova Group, (May, 2024) Phase II PEA, QCP Facility Plot Plan, Coachella Valley Engineers, (January, 2025).

Findings of Fact:

a) Less Than Significant Impact. During Project construction, heavy equipment (e.g., dozers, excavators, tractors) would be operated on the subject property during the construction phases of the Project. The heavy equipment would likely be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, 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 can 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 the proposed Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the Environmental Protection Agency (EPA), California Department of Toxic Substances Control (DTSC), SCAQMD, and Santa Ana RWQCB. With mandatory compliance with applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase, and impacts would be less than significant.

Pertaining to long-term operations, the Proposed Project includes development of fabrication facility, warehouse, office, batch plant and open storage space which would involve use of limited quantities of chemicals such as cleaning and degreasing solvents, paints, varnishes and similar materials. These chemicals will be transported and stored within the Project site. These will occur in limited quantities and will not require a hazardous material handling/storage permit. None of these chemicals will be used in sufficient quantities

The Proposed Project would not result in a significant risk of explosion or accidental release of hazardous substances, because the cleaners and household chemicals used are not explosive and will not be stored in large quantities. The use and handling of hazardous materials during construction activities and long-term operation of the proposed Project would occur in accordance with applicable Federal, State, and local laws including California Occupational Health and Safety Administration (CalOSHA) requirements. Impacts would be less than significant.

b) Less Than Significant Impact. A Phase I Environmental Site Assessment (ESA) was prepared for the Project site by Nova Group (May, 2024). Based on reviewed historical aerial photographs and topographic maps related to the Project site, Nova Group, has performed a Phase I ESA in conformance with the scope and limitations of ASTM E1527-21 of the Vacant Lot property located at Southside of Avenue 54, east of Harrison Street, Thermal, California. Based on review of historical information, prior uses of the Subject Property such that are expected to have resulted in a REC in connection with the Subject Property were not identified. The assessment revealed no evidence of *RECs, CRECs and/or significant data gaps* in connection with the Subject Property. Based on the information available during the course of this assessment, Nova did not recommend further assessment of the Subject Property.

The Phase I ESA prepared for this site determined that "Further Environmental Investigation is not necessary." However, as the Subject Property had been farmed in decades past, including current farming in place for at least 15 years, and in reviewing Department of Toxic Substance Control (DTSC) policies and guidelines pertaining to use of farmlands, it was determined that additional

investigation in the form of soil sampling was needed to assure that the Project would not expose people or the environment to a significant hazard.

A Phase II Soil Sampling and Preliminary Endangerment Assessment (PEA) was prepared for the Project site conducted in accordance with "Interim Guidance for Sampling Agricultural Properties," California Department of Toxic Substances Control (DTSC). The Phase II Investigation sampled and evaluated the Project site for Pesticides via EPA 8081A, Arsenic via EPA 6010B and Metals Acid Digestion EPA 3050B.

Current and Prior Agricultural Activity

All fourteen (14) samples tested above reporting limits for DDE, albeit at low levels. DDE is a degraded compound of DDT and can exist for decades. It is not considered to be "immediately dangerous to life of heath" (IDLH) in these low-level soil concentrations. This is a common occurrence in the southern Coachella Valley farming area where DDT was used up until banned in 1972. The highest concentrations of DDT, (and degraded compounds DDD and DDE) have been encountered on farmlands that have been abandoned the longest since the 1970's when DDT was last legally used. This is reflected on the Subject Property which was farmed for row crops from the early 1950's up to the late 1970's/early 1980's, and then left abandoned up to the degraded any remaining DDT,DDD and DDE into the low levels encountered during this current sampling process.

Additionally, it has been found that the construction process will further dissipate the concentration of DDE in the soil. When the project area is watered, rough graded and left in the sun, watered again, over excavated (as required in the Coachella Valley by geotechnical reports), left in the sun and then finish graded, any remaining levels of DDE (as well as DDD and DDT in the soil will have been greatly dissipated. As an abundance of caution, after finish grading is completed soil samples can be taken from the center of building pads. However, this would appear to be not necessary for the low levels encountered the proposed industrial Project on the Subject Property.

Further action required: No further investigation is necessary.

Arsenic

All samples tested showed Arsenic at levels <1.0 mg/kg. This is less than often naturally occurring concentrations of Arsenic in Coachella Valley farming areas typically ranging from **0.1 to 40 mg/kg**.

Further action required: No further investigation is necessary.

Results of the Phase II Soil Sampling and Preliminary Endangerment Assessment (PEA) determined that residues of arsenic, pesticides, or metals found on the Project Site were not at levels considered to be "immediately dangerous to life of heath" (IDLH). Furthermore, it has been found that the construction process further dissipates the low level soil concentrations of remnant contaminants found across farmlands in the Coachella Valley. When the project area is watered, rough graded and left in the sun, watered again, over excavated (as required in the Coachella Valley by geotechnical reports), left in the sun and then finish graded, the levels of any remaining contaminants in the soil has greatly dissipated. As an abundance of caution, after finish grading soil samples can be taken from the center of representative building pads. Implementation of these recommendations will assure that any that potential impacts related to prior farming on the site would be reduced to less than significant.

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

c) No Impact. The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. Under long-term operational conditions, the proposed Project would be required to maintain adequate emergency access for emergency vehicles on-site as required by the County. Furthermore, the Project would not result in a substantial alteration to the design or capacity of any existing public road that would impair or interfere with the implementation of evacuation procedures. Because the Project would not interfere with an adopted emergency response or evacuation plan, no impact would occur.

d) No Impact. The nearest school site facility to the Project site is the Coachella Valley High School located roughly 7,175 feet southwest of the Project site. As discussed in Threshold 21(a) and (b), as with any business, the transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations to preclude substantial public safety hazards. Accordingly, there would be no potential for existing or proposed schools to be exposed to substantial safety hazards associated with the routine transport of hazardous substances or materials to and from the Project site. The Proposed Project will result in the development of commercial office, classroom and warehouse space, which is not expected to emit any hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste to jeopardize schools. No impact is expected.

e) No Impact. The Project site is currently vacant. The Project site is not listed on the Hazardous Waste and Substances Sites List produced by the DTSC, which is referred to as "EnviroStar" (DTSC, 2021). As part of the Phase I ESA, Nova reviewed regulatory databases and available agency files and records for the site. To determine whether the Project site is identified as a hazardous materials site pursuant to Government Code Section 65962.5, an American Society for Testing and Materials (ASTM) radius search was performed by Environmental Data Resources (EDR) regulatory database record search, which obtains updated environmental database information from Standard Federal, State, and Tribal Environmental Record Sources. The EDR regulatory database record search determined that there are no hazardous materials or waste sites located on or near the site, and the site is not included on a list compiled pursuant to Government Code Section 65962.5. The Proposed Project will not create a significant hazard to the public or environment. No impact is anticipated.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required

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," GIS database

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

Findings of Fact:

a) Less Than Significant Impact. The Project site is located within "Compatibility Zone D" of the Jacqueline Cochran Regional Airport Master Plan (JCRA) Influence area and is therefore subject to the JCRA Land Use Compatibility Plan (ALUCP). Within Compatibility Zone D, there is no limitation of intensity per acre of non-residential development. Although no explicit upper limit on usage intensity is defined for Zone D, land uses that attract very high concentrations of people in confined areas—are discouraged in locations below or near the principal arrival and departure flight tracks. The proposed Project is consistent with this limitation. The Project does not entail any uses prohibited or discouraged in Compatibility Zone E. Therefore, impacts are less than significant.

b/c) Less Than Significant Impact. The Project is subject to review by the Airport Land Use Commission (ALUC) to determine consistency with the JCRA ALUCP. As described in (22.a. above), the proposed Project does not entail any uses prohibited or discouraged in Compatibility Zone D and would not create a hazard. Therefore, impacts are less than significant.

d) No Impact. There are no private airport facilities or heliports within the vicinity of the Project site (Google Earth Pro, 2021). As such, the Project would not result in a safety hazard for people residing or working in the Project area associated with private airports or heliports, and no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Source(s): Riverside County General Plan Figure S-9 "Special Flood Hazard Areas," Figure S-10 "Dam Failure Inundation Zone," Riverside County Flood Control District Flood Hazard Report/ Condition, GIS database

Findings of Fact:

a) Less Than Significant Impact. The Proposed Project site is located in the Whitewater River watershed which drains into the Salton Sea and is part of the larger Colorado River Watershed. All water providers in the watershed are required to comply with Regional Water Quality Control Board (RWQCB) standards for the protection of water quality, including the preparation of site-specific Water Quality Management Plans for surface waters. The Proposed Project will generate demand for domestic water and wastewater, which will be governed by the Coachella Water Authority (CWA) standard requirements. Construction of on-site connections will be subject to all CWA requirements. The Proposed Project will not violate water quality standards or waste discharge requirements.

Pursuant to the County's National Pollutant Discharge Elimination System (NPDES) permit and in accordance with the Riverside County Code Section 13.12.060(C), the Project is required to prepare and implement a site-specific Preliminary Water Quality Management Plan (WQMP). The WQMP is a site-specific, post-construction water quality management program designed to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters, under long-term conditions via Best Management Practices (BMPs).

The Quick Crete Products (QCP) Manufacturing Facility, totaling approximately 19.2 acres,will consist of a single building of 88,400 SF housing space for administrative, manufacturing, and warehouse. The site will also contain exterior areas for parking, concrete batch plant for manufacturing purposes, finished product storage area (~36,963 SF),concrete mold storage area(~96,100 SF),and retention basins. The surfacing for all non-landscaped areas, except for the retained date palm groves as noted on the project exhibits, will be either asphalt concrete (drive aisles and parking area) or concrete, except for the concrete mold storage area which will be aggregate surface consisting of crushed miscellaneous base (CMB) materials.

The WQMP prepared for QCP Project covered the full site development, excluding two areas that are being deemed as self-retaining and non-improved, as no expansion is currently being anticipated for the non-improved areas. The two non-improved areas of the site area located along the west side of the site at the north end (approximately 4.53 acres to be retained as a date grove) and along the southern property line (outside of the two retention basins, an area approximately 8.24 acres, also be retained as a date grove).The project has been designed to direct stormwater runoff to either of the two proposed retention basins.

The Site Plan prepared for the project WQMP depicts the following project features:

- Location and identification of all structural BMPs, including Source Control, LID/Site Design And Treatment Control BMPs.
- Landscaped areas.
- Paved areas and intended uses (i.e., parking, outdoor work area, outdoor material Storage area, sidewalks, patios, tennis courts, etc.).
- Number and type of structures and intended uses (i.e., buildings, tenant spaces, dwelling

units, community facilities such as pools, recreation facilities, tot lots, etc.).
- Infrastructure (i.e., streets, storm drains, etc.) that will revert to public agency ownership and operation.
- Location of existing and proposed public and private storm drainage facilities (i.e., stormdrains, channels, basins, etc.), including catch basins and other inlets/outlet structures. Existing and proposed drainage facilities should be clearly differentiated.
- Location(s) of Receiving Waters to which the project directly or indirectly discharges.
- Location of points where onsite (or tributary offsite) flows exit the property/project site.
- Delineation of proposed drainage area boundaries, including tributary offsite areas, for each location where flows exit the project site and existing site (where existing site flows are required to be addressed). Each tributary area should be clearly denoted.
- Pre-and post-project topography

The gross area of the subject property is approximately 19.01 acres. The proposed site plan proposes to drain all stormwater runoff to one of two retention basins located just north of the south property line. As previously noted, the site will have two areas that will remain undeveloped, which total approximately 5.75 acres. The proposed site plan includes approximately 7.66 acres of impervious area and approximately 11.35 acres of pervious area, which includes the undeveloped areas. Stormwater runoff will be conveyed to either the east or west retention basin via storm drain system or sheet flow. Since the basins are located on the southern portion of the site, and with the existing ground predominately sloping from northwest to southeast, the historical flow patterns will be retained without significant interruption. The onsite retention basins have been sized in accordance with County Standards to retain the worst case 100-year event, plus a one-foot freeboard. In general, the western half of the site will drain to the western retention basin, and the eastern half to the east basin, except for 54th Avenue stormwater runoff, that runoff will all be routed to the eastern basin.

Implementation of the WQMP ensures on-going, long-term protection of the watershed basin. The final approved WQMP will include a complete copy of the final Conditions of Approval from the County. Because compliance with an applicable WQMP is a required condition of approval for all development proposals and long-term maintenance of on-site water quality features would be required by the County to ensure their long-term effectiveness, compliance with the site specific WQMP would ensure that water quality impacts associated with post-development at the Project site and long-term operation of the Project would be less than significant. Therefore, both during construction and the long-term use of the Project site as a QCP Fabrication Facility would not violate any water quality standards or waste discharge requirements and impacts would be less than significant.

b) Less Than Significant Impact. The Project would not install any water wells; therefore, the Project would not directly extract groundwater from the Coachella Valley Groundwater Basin. Notwithstanding, the Project would install impervious surfaces on the site and the increase the impervious surface cover of the site, which could reduce the amount of water percolating down into the groundwater basin that underlies the Project area. However, approximately 60% of the Project site will remain as open space and pervious, not covered with impervious surfaces. This includes existing date palms, grass, landscaping and detention basin which provides for filtering stormwater as it percolates into the ground, eliminating potential adverse effects related to groundwater recharge. Therefore, with buildout of the Project, the local groundwater levels would not be adversely affected and impacts to groundwater supplies and recharge would be less than significant.

c) Less Than Significant Impact. As described under (a) above, the Preliminary Grading Plan for the QCP Project shows that offsite drainage will be directed through the project to the proposed

eastern retention basin, while onsite drainage will be directed to one of two (2) onsite retention basins, contained within a bermed existing permeable date grove.

Existing Drainage

The Proposed Project site is relatively flat and contains no rivers or streams. The Project site consist of planted date trees with existing site drainage that is conveyed as surface flow in the south easterly direction. Development of the proposed Project will increase impermeable surfaces on-site, and therefore increase on-site storm flows.

Proposed Drainage System

Per the County of Riverside requirements, the project shall retain all surface runoff in an on-site retention basin. "The basin shall be designed to retain the runoff from the worst case of the 1hr, 3hr, 6hr or 24hr duration, 100-year storm" and "There shall be no standing water in the retention basin after 72 hours of any storm event." The project proposes an on-site stormwater retention basin located in the southern portion of the site, adjacent vacant lands. A final hydrologic analysis dated January 13, 2025 demonstrated that the Project meets the County's standards. These standard requirements will assure that impacts associated with storm water retention remain less than significant.

Summary

The Proposed Project will be required to comply with the County's storm water retention requirements, including the approval of a project-specific final hydrology study and water quality management plan prior to the issuance of building permits. Implementation of these and other applicable requirements will assure that the project will not create or contribute water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

The Project's Plot Plan application materials, which include a Conceptual Grading Plan and that are on file with the County of Riverside Planning Department are hereby incorporated by reference pursuant to CEQA Guidelines § 15150; these plans show the details of the Project's storm water and water quality infrastructure system. (CVE, 2021) Because the Project would not substantially alter the existing drainage pattern of the site or area, impacts would be less than significant.

d) Less Than Significant Impact. Implementation of the Project has the potential to result in soil erosion and/or siltation on -or offsite. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and under long-term operation of the Project.

Temporary Construction-Related Activities

Grading and construction activities on the Project site would expose underlying soils and disturb surficial soils on the Project site. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water. Pursuant to the requirements of the State Water Resources Control Board, the Project Applicant is required to obtain a NPDES permit for construction activities, including proposed grading. 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. The County's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Project-specific SWPPP. The SWPPP will identify a combination of erosion control and sediment control measures (i.e., BMPs) to reduce or eliminate sediment discharge to surface water from stormwater and non-storm water discharges during construction. In addition, proposed construction activities would be required to comply with SCAQMD

Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion. Rule 403 requires that certain construction practices be followed that limit dust and dirt from leaving the construction site. For example, no dust is allowed to be visible in the air beyond the property line of the construction site, and no dirt is allowed to be tracked out of the site by more than 25 feet. With mandatory compliance to the requirements noted in the Project's SWPPP, as well as mandatory compliance to applicable regulatory requirements including but not limited to SCAQMD Rule 403, the potential for water and/or wind erosion impacts during Project construction would be less than significant and mitigation is not required.

Long-Term Operational Activities Following construction, wind and water erosion on the Project site would be minimal because the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, the County's MS4 NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a WQMP (Riverside County Ordinance No. 754). The WQMP is required to identify an effective combination of erosion control and sediment control measures (i.e., BMPs to reduce or eliminate sediment discharge to surface water from stormwater and non-storm water discharges). The WQMP for the Project is required to incorporate BMPs, which are effective at removing silt and sediment from stormwater runoff. WQMPs also require post-construction maintenance and operational measures to ensure ongoing erosion protection. Compliance with the Project-Specific WQMP for the Project would be required as a condition of Project approval as would the long-term maintenance of water quality features. With compliance of the Project-specific WQMP, implementation of the proposed Project would not result in substantial erosion or siltation on-site or off-site. Therefore, because the Project would not result in substantial erosion or siltation on-site or off-site, impacts would be less than significant.

e) Less Than Significant Impact. See the analysis under Thresholds 23 (a) (c) and (d) that describes the potential for stormwater runoff and the proposed storm drain system and retention basin.

The Project's onsite drainage design concept will provide flood protection to the proposed building pad, the proposed basins will adequately treat onsite flows, and the detention basins will mitigate for increased runoff. The offsite drainage improvements will adequately protect the Project site from offsite flow and prevent offsite flows from commingling with onsite flows, and the proposed Project will not impact flooding conditions to upstream or downstream properties. Therefore, because the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site, impacts would be less than significant.

f) Less Than Significant Impact. The Project's stormwater plan is described in Thresholds 23 (a) (c) and (d). Adequate capacity exists in the existing and planned stormwater drainage system to service the Project. Therefore, because the Project would not create runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, impacts would be less than significant.

g) Less Than Significant Impact. As discussed in Thresholds 23 (a) (c) and (d), the Project's onsite drainage design concept will provide flood protection to the proposed building pad, the proposed basins will adequately treat onsite flows, and the detention basin will mitigate for increased runoff, the offsite drainage improvements will adequately protect the Project site from offsite flow and prevent offsite flows from commingling with onsite flows, and the proposed Project will not impact flooding conditions to upstream or downstream properties. Therefore, because the Project would not impede or redirect flows, impacts would be less than significant.

h) Less Than Significant Impact. According to TLMA, the Project site is located outside of a flood plain and flood plain review is not required. Additionally, as discussed in Thresholds 23 (a) (c) and (d), the Project's onsite drainage design concept will provide flood protection to the proposed building pad, the proposed basins will adequately treat onsite flows, and the detention basin will mitigate for

increased runoff, the offsite drainage improvements will adequately protect the Project site from offsite flow and prevent offsite flows from commingling with onsite flows, and the proposed Project will not impact flooding conditions to upstream or downstream properties.

The nearest large body of surface water to the Project site is the Salton Sea located approximately 9.2 miles southeast of the Project site (Google Earth Pro, 2020). According to MVAP Figure 11, Special Flood Hazards Areas, the Project site is not located within any dam inundation areas or special flood hazard areas. As discussed in Thresholds 23 (a) (c) and (d), the Project's onsite drainage design concept will provide flood protection to the proposed building pad, the proposed basins will adequately treat onsite flows , and the detention basin will mitigate for increased runoff, the offsite drainage improvements will adequately protect the Project site from offsite flow and prevent offsite flows from commingling with onsite flows, and the proposed Project will not impact flooding conditions to upstream or downstream properties. The Project's Plot Plan application materials, which include a Conceptual Grading Plan and that are on file with the County of Riverside Planning Department are hereby incorporated by reference pursuant to CEQA Guidelines § 15150; these plans show the details of the Project's storm water and water quality infrastructure system. Because the Project would not result in the release of pollutants due to Project inundation from a flood hazard, tsunami, or seiche zone, impacts would be less than significant.

i) Less Than Significant Impact. The California Porter-Cologne Water Quality Control Act (California Water Code §§ 13000), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Colorado River RWQCB. Water quality information for the Colorado River watershed is contained in the Colorado River Region Basin Plan. This document is herein incorporated by reference and is available for public review at the Santa Ana RWQCB office in Palm Desert.

CWA Section 402 is applicable to the Project, which authorizes the NPDES permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites one acre or larger to prepare a SWPPP and obtain authorization to discharge stormwater under an NPDES construction stormwater permit.

Long-Term Operational Water Quality

Receiving waters and impaired waters are noted above. The Project's pollutants of concern include bacterial indicators, nutrients, toxic organic compounds, trash and debris, and oil and grease. The County's MS4 NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Water Quality Management Plan (WQMP) (Riverside County, 2019a, Chapter 5.72). The Project-Specific Preliminary WQMP identifies an effective combination of water quality control measures (i.e., Best Management Practices (BMPs) to reduce or eliminate water pollutants before they reach the groundwater table). The Preliminary WQMP for the Project, prepared by CVE, incorporates BMPs that would remove waterborne pollutants from stormwater flows. The WQMP requires post-construction maintenance and operational measures to ensure ongoing effectiveness. Compliance with the WQMP would be required as a condition of Project approval. Therefore, the proposed Project's operation would not obstruct implementation of the Colorado River Basin Plan. The Project Applicant, successors in interest, and construction contractors would be required to comply with the Project specific WQMP as a condition of approval.

Groundwater Management Plan and Sustainability Plan

The Project site is located within the Whitewater Groundwater Management Area, and is therefore subject to the CWA's "Groundwater Management Plan – Whitewater Groundwater Basin". The Groundwater Management Plan (GMP) is intended to manage the Whitewater Groundwater Basin in a manner that would supplement CWA's water supplies.

The Project would not directly extract groundwater; however, with addition of the proposed Project, an increase in impervious surface cover of the site, which would reduce the amount of water directly percolating into the groundwater table on the Project site.

Project Site Design BMP Concepts:

The site will convey stormwater runoff to one of two retention basins located on the southern portion of the property. Stormwater will enter either of the retention basins via sheet flow (from adjacent aggregate surfaced storage area), storm drain from the proposed four site catch basins, or channel flow which connects to the end of the proposed curb and gutter and from the trench drain located immediately west of the proposed building. All BMP elements will be constructed with the overall site development and maintained by the owner.

The BMPs that are incorporated into the site design to fully address all management areas would minimize potential adverse effects related to groundwater recharge. After implementation of the Project, the Project's proposed stormwater drainage system would convey water runoff into the public storm drain system which flows to downstream water bodies where percolation into the groundwater table occurs. Therefore, the proposed Project would not conflict or obstruct implementation of a groundwater management plan or implementation of a groundwater sustainability plan. Therefore, impacts would be less than significant.

Applicable Regulatory Requirements

- Prior to issuance of a grading permit, the Project Applicant is required to obtain coverage under a NPDES permit from the State Water Resources Control Board. Evidence that a NPDES permit has been issued shall be provided to the County of Riverside prior to issuance of a grading permit.
- Prior to issuance of a grading permit, the Project Applicant is required to prepare a SWPPP. Project contractors shall be required to ensure compliance with the SWPPP and shall permit periodic inspection of the construction site by the County of Riverside staff or its designee to confirm compliance.
- Prior to issuance of a grading permit, the Project Applicant is required to prepare and the County of Riverside shall approve a Final WQMP. The Project Applicant or its property manager shall be required to ensure compliance with the Final WQMP and shall permit periodic inspection of the Project site by County of Riverside staff or its designee to confirm compliance.
- The site is located within the bounds of the Coachella Valley Area Master Drainage Plan (CVMDP) for which drainage fees and mitigation fees have been established by the Board of Supervisors. Applicable ADP mitigation fees will be due (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) prior to permits for this Project. The drainage fee is required to be paid prior to the issuance of the grading permits.

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

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

Findings of Fact:

a) No Impact. The subject site is designated as LI (Light Industrial) and M-SC (Manufacturing Service Commercial) in the County's GIS database and on the General Plan Land Use and Zoning Maps, respectively. Both designations allow for the project's proposed commercial use. The Proposed Project is consistent with existing zoning and land use plans with regard to use, size and scale. Therefore, the proposed Project will be consistent with adopted plans and programs and no impacts to land use policy are expected.

a) No Impact. Implementation of the Project would not disrupt or divide the physical arrangement of an established community. The Project site is bounded by 54th Avenue on the north with a residential subdivision beyond (within the City of Coachella). Land immediately to the south and east is vacant with the land to the west mostly vacant a residence in the northwest area. Because the Project site is not surrounded or within the vicinity of a residential community, the proposed Project would have no potential to disrupt or divide the physical arrangement of any established community. No impact would occur.

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"

Findings of Fact:

a) No Impact. Riverside County General Plan Figure OS-6 shows that the Project site and surrounding area is located within Mineral Resource Zone 3 (MRZ-3), meaning the significance of mineral deposits is undetermined and the site is not located within an area designated by the State

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

Mining and Geology Board as being of regional or Statewide significance (Riverside County, 2015a, Figure OS-6). Because the site is not located within an area known for mineral resources that are of value to the region and the residents of the State, no impact would occur.

b) No Impact. The Project site has a General Plan land use designation as LI (Light Industrial) and Zoning designation as M-SC (Manufacturing Service Commercial) and does not have a designation or zoning for mining. As discussed above in Threshold 25(a), the Project site is not located within an area designated by the State Mining and Geology Board as being of regional or Statewide significance (Riverside County, 2015a, Figure OS-6). Therefore, there is no potential for the Project to 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) No Impact. As discussed above in Thresholds 25(a) and (b), the site is not located in a State designated sector of valuable resources and there are no known quarries or mines in the immediate vicinity of the Project site. Therefore, no impact 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?	☐	☐	☒	☐
b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Source(s): Riverside County General Plan Figure S-20 "Airport Locations," County of Riverside Airport Facilities Map, QCP Facility Noise Impact Analysis, Urban Crossroads, (January, 2025).

Findings of Fact:

a) Less Than Significant Impact. The Jacqueline Cochran Regional Airport (JCRA) is located approximately 1.15 miles to the south of the Project site. The Project is within Zone D of the Riverside County ALUCP (Airport Land Use Compatibility Plan) zones. The ALUCP stipulates that so long as the density of the Project is restricted to 100 people/acre the potential conflict can be abated for non-residential uses within the zone. As shown in Exhibit 7-A, the Project lies outside of the 55 dBA CNEL contour for JCRA. This is below the compatibility standards of 55 dBA CNEL, as shown on the significance criteria matrix in Table 4-1. Therefore, impacts due to aircraft noise would be less than significant. Further, there are no uses are prohibited in this area except hazards to flight. As such, the Project would not expose people residing or working on the Project area to excessive noise levels. Impacts would be less than significant.

b) No Impact. There are no private airfields or airstrips in the vicinity of the Project site (Google Earth Pro, 2020). Therefore, the Project would not expose people to excessive noise levels associated with operations at a private airstrip. No impact would occur.

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

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s) : Riverside County General Plan, Table N-1 ("Land Use Compatibility for Community Noise Exposure"), Federal Interagency Committee on Noise (FICON), Project Application Materials, QCP Facility Noise Impact Analysis, Urban Crossroads, (January, 2025).

Findings of Fact:

a) Less Than Significant Impact. The Project is located south of Avenue 54 and east of Harrison Street in the unincorporated community of Thermal. The nearest residential land uses are located to the north across Avenue 54 (in the City of Coachella) and west of the Project site. The properties immediately to the east and south are undeveloped. The closest major roadway is Highway 111, located approximately 1.24 miles east of the Project site, and the closest airport is the Jacqueline Cochran Regional Airport, located 1.15 miles south of the Project site.

Although the County of Riverside General Plan Noise Element and County Code do not identify any noise level increase thresholds, the County of Riverside General Plan EIR No. 521 outlines incremental noise impact criteria for noise sensitive uses in Table 4.15-H. This significance criteria derived from the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual are used to evaluate the incremental transportation noise level impacts and establishes a method for comparing future project noise with existing noise. In effect, the amount to which a given noise level increase is considered acceptable is reduced based on existing ambient noise conditions.

The Project consists of a concrete landscape manufacturing facility with an 88,400-square-foot (SF) building that includes 83,700 square feet for manufacturing and warehouse, 1,900 square feet for administrative office and 2,800 for employee support/break area and a 106-space parking lot. These uses are within the normally acceptable community noise exposure level. The noise level increases used to determine significant impacts for non-noise-sensitive land uses rely on the Federal Interagency Committee on Noise (FICON) Community Noise Equivalent Level (CNEL) of normally acceptable 60 dBA CNEL exterior noise level criteria. Also, the County of Riverside General Plan Noise Element, Table N-1, Land Use Compatibility for Community Noise Exposure was used to establish the satisfactory noise levels of significance for non-noise- sensitive land uses in the Project study area. The normally acceptable exterior noise levels for noise-sensitive land uses is 70 dBA CNEL. Noise levels greater than 70 dBA CNEL are considered conditionally acceptable per Noise Element Table N-1.

To describe the potential off-site Project noise levels, six receiver locations in the vicinity of the Project site were identified. The selection of receiver locations is based on FHWA guidelines and is consistent with additional guidance provided by Caltrans and the FTA, as previously described in Section 5.2. Other sensitive land uses in the Project study area that are located at greater distances than those

identified in this noise study will experience lower noise levels than those presented in this report due to the additional attenuation from distance and the shielding of intervening structures. Distance is measured in a straight line from the Project boundary to each receiver location.

RECEIVER LOCATIONS



Subject Property Details Map

Vacant Lot
Southside of Avenue 54, east of Harrison Street
Thermal, California 92274
Project#: V24-4021

Nova Group

R1: Location R1 represents the private residence at 85186 Corte del Roble (City of Coachella), approximately 191 feet north of the Project site. R1 is placed in the residence's outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

R2: Location R2 represents the private residence at 85467 54th Avenue, approximately 391 feet east of the Project site. Receiver R2 is placed at the façade facing the Project site. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

R3: Location R3 represents the private residence at 54540 Shady Lane, approximately 720 feet east of the Project site. Receiver R3 is placed at the façade facing the Project site. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

R4: Location R4 represents the existing noise sensitive residence at 85300 55th Avenue, approximately 698 feet south of the Project site. Receiver R4 is placed at the façade facing the Project site. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

R5: Location R5 represents the existing noise sensitive residence at 54684 Harrison Street, approximately 621 feet southwest of the Project site. Receiver R5 is placed in the outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

R6: Location R6 represents the existing noise sensitive residence at 85265 54th Avenue, approximately 40 feet west of the Project site. Receiver R6 is placed in the outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was taken near this location to describe the existing ambient noise environment.

OPERATIONAL NOISE IMPACTS

The QCP Fabrication Facility Noise Impact Study analyzed potential impacts resulting from the activities associated with the operation of the Project. The operational noise analysis described noise level impacts associated with the expected typical daytime and nighttime activities at the Project site.

Table 17 indicates that the hourly noise levels associated with the roof top air conditioners, a compressor, mixer, sandblaster air filters, trash enclosures, parking lot vehicle movements and a truck staging/loading area are expected to range from 26.6 to 45.1 dBA Leq at the nearby sensitive receiver locations for the daytime. Table 18 indicates a range of 22.5 to 37.1 dBA Leq for the nighttime. Following are the results of the operational analysis.

Table 17 DAYTIME PROJECT STATIONARY/AREA-SOURCE NOISE LEVELS (DBA LEQ)

Noise Source	R-1	R-2	R-3	R-4	R-5	R-6
Roof-Top Air Conditioning Units	39.5	33.9	24.9	25.9	28.0	39.2
Compressor	32.3	22.5	21.7	38.3	39.0	43.8
Mixer	27.0	34.3	29.6	18.0	10.8	15.7
Sandblaster Air Filter	41.5	49.2	43.4	27.3	21.4	29.1

Trash Enclosure	20.4	12.7	22.7	22.1	22.4	22.6
Parking Vehicle Movements	28.0	21.9	10.8	10.8	13.5	30.9
Staging/Loading Activities	42.9	35.5	38.9	41.2	42.7	46.1
Total All Noise Sources	**40.3**	**34.2**	**26.6**	**38.5**	**39.3**	**45.1**

TABLE 18: NIGHTTIME PROJECT STATIONARY/AREA-SOURCE NOISE LEVEL (DBA LEQ)

Noise Source	**R-1**	**R-2**	**R-3**	**R-4**	**R-5**	**R-6**
Roof-Top Air Conditioning Units	37.1	31.5	22.5	23.5	25.6	36.8
Compressor	0.0	0.0	0.0	0.0	0.0	0.0
Mixer	0.0	0.0	0.0	0.0	0.0	0.0
Sandblaster Air Filter	0.0	0.0	0.0	0.0	0.0	0.0
Trash Enclosure	19.4	11.7	21.7	21.2	21.5	21.7
Parking Vehicle Movements	0.0	0.0	0.0	0.0	0.0	0.0
Staging/Loading Activities	0.0	0.0	0.0	0.0	0.0	0.0
Total All Noise Sources	**37.1**	**31.5**	**22.5**	**23.5**	**25.6**	**36.8**

OPERATIONAL NOISE LEVEL COMPLIANCE

As stated above, the County of Riverside General Plan Noise Element and County Code do not identify any noise level increase thresholds, the County of Riverside General Plan EIR No. 521 outlines incremental noise impact criteria for noise sensitive uses in Table 4.15-H. The Urban Crossroads Noise Analysis evaluated the potential operational noise levels against the (more specific) City of Coachella Municipal Code exterior noise standards at the closest noise-sensitive receiver locations, (R-1 is within the City of Coachella). Table 19 shows that the Project-related operational noise levels at the closest sensitive receiver locations will range from 22.5 to 45.1 dBA Leq and will satisfy the residential daytime 55 dBA Leq and nighttime 45 dBA Leq noise level standards of the City of Coachella Municipal Code.

TABLE 19: OPERATIONAL NOISE LEVEL COMPLIANCE

Receiver Location	**Project Operational Noise Levels (dBA Leq)**		**Noise Level Standards (dBA Leq)**		**Threshold Exceeded?**	
	Day	**Night**	**Day**	**Night**	**Day**	**Night**
R-1	**40.3**	**37.1**	**55**	**45**	**No**	**No**
R-2	**34.2**	**31.5**	**55**	**45**	**No**	**No**
R-3	**26.6**	**22.5**	**55**	**45**	**No**	**No**
R-4	**38.5**	**23.5**	**55**	**45**	**No**	**No**
R-5	**39.3**	**25.6**	**55**	**45**	**No**	**No**
R-6	**45.1**	**36.8**	**55**	**45**	**No**	**No**

CONSTRUCTION NOISE IMPACTS

The QCP Fabrication Facility Noise Impact Study analyzed potential impacts resulting from the activities associated with the construction of the Project. The construction noise analysis described noise level impacts associated with the expected typical daytime construction activities at the Project site. Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts at the nearby sensitive receiver locations were completed. To assess the worst-case construction noise levels, the Project construction noise

analysis relies on the highest noise level impacts when the equipment with the highest reference noise level is operating at the closest point from the edge of primary construction activity (Project site boundary) to each receiver location.

TABLE 20: CONSTRUCTION EQUIPMENT NOISE SUMMARY

Receiver Location	Construction Noise Levels dBA Leq)					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels
R-1	58.2	59.2	52.2	53.2	51.2	59.2
R-2	55.2	56.2	49.2	50.2	48.2	56.2
R-3	52.3	53.3	46.3	47.3	45.3	53.3
R-4	52.2	53.2	46.2	47.2	45.2	53.2
R-5	52.6	53.6	46.6	47.6	45.6	53.6
R-6	62.7	63.7	56.7	57.7	55.7	63.7

CONSTRUCTION NOISE LEVEL COMPLIANCE

To evaluate whether the Project will generate potentially significant short-term noise levels at the nearest receiver locations, a construction-related daytime noise level threshold of 80 dBA Leq is used as a reasonable threshold to assess the daytime construction noise level impacts. The construction noise analysis shows that the nearest receiver locations will satisfy the reasonable daytime 80 dBA Leq significance threshold during Project construction activities, as shown in Table 21. Therefore, the noise impacts due to Project construction noise are considered less than significant at all receiver locations.

TABLE 21: CONSTRUCTION NOISE LEVEL COMPLIANCE

Receiver Location	Construction Noise Levels (dBA Leq)		
	Highest Construction Noise Levels2	Threshold	Threshold Exceeded?
R-1	59.2	80	No
R-2	56.2	80	No
R-3	53.3	80	No
R-4	53.2	80	No
R-5	53.6	80	No
R-6	63.7	80	No

The Project's proposed use of a QCP Fabrication Facility and parking lot are not considered to be a significant operational source of noise. Because the Project-related operational noise increases do not result in an exceedance of the significance threshold, the Project would not contribute to a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project and stationary noise impacts would be less than significant. Compliance with Riverside County Ordinance No. 847 (regulating noise) will assure that any that potential impacts related to outdoor operations on the site would be less than significant.

It is assumed that construction would not occur during the noise-sensitive nighttime hours. To control noise impacts associated with the construction of the proposed Project, as with any other construction

project in the County, the Project would be required to comply with the County's Noise Ordinance contained as Riverside County Code Section 9.52.020. Section 9.52.020 requires that noise from any private construction activity located within one-quarter of a mile from an inhabited dwelling be restricted to between the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May.

In addition, the following measures are recommended to reduce construction noise and vibrations, emanating from the proposed project:

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

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

3. Equipment shall be shut off and not left to idle when not in use.

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

5. Jackhammers, pneumatic equipment and all other portable stationary noise sources shall be shielded and noise shall be directed away from sensitive receptors.

6. The project proponent shall mandate that the construction contractor prohibit the use of music or sound amplification on the project site during construction.

7. The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment.

Therefore, with adherence with County Code Section 9.52.020 and the abo cited measures, the Project would not cause a substantial construction related temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, and impacts would be less than significant.

b) Less Than Significant Impact. Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential for human response (annoyance) and building damage using a vibration assessment method defined by Caltrans.

QCP Facility Noise Impact Analysis prepared by Urban Crossroads analyzed the expected Project-related vibration levels at the nearby receiver building façade locations. At distances ranging from 40 to 720 feet from the building façade to the Project construction activities, construction vibration velocity levels are estimated to range from less than 0.01 up to 0.10 (in/sec). Based on the maximum acceptable continuous vibration threshold of 0.30 PPV (in/sec), the typical Project construction vibration levels will fall below the building damage thresholds at all noise-sensitive receiver locations. Moreover, the vibration levels reported at the sensitive receiver locations are unlikely to be sustained during the entire construction period but will occur rather only during the times that heavy construction

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

equipment is operating adjacent to the Project site perimeter. Therefore, the Project-related vibration impacts are considered less than significant during typical construction activities at the Project site.

Mitigation:

None.

Monitoring:

None.

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

Source(s): Riverside County General Plan Figure OS-8 "Paleontological Sensitivity," Paleontological Assessment for the QCP Fabrication Facility Project, Brian F. Smith & Associates, (December, 2024).

Findings of Fact:

a) Less Than Significant Impact with Mitigation Incorporated. The presence of fossiliferous Holocene fluvial and lacustrine deposits of ancient Lake Cahuilla mapped across the project; the known occurrence of fossils from the surface and at shallow depths from these sediments across the Salton Basin; and the "High" paleontological sensitivity rating assigned to deposits of ancient Lake Cahuilla for yielding paleontological resources all support the recommendation that full-time paleontological monitoring from the surface be required during mass grading and excavation activities in undisturbed sediments in order to mitigate any adverse impacts (loss or destruction) to potential, non-renewable paleontological resources. Monitoring of artificial fill or disturbed soils is not warranted.

The submittal and approval of a Paleontological Resource Impact Mitigation Program (PRIMP) is required prior to issuance of grading permits, when requested by the Riverside County Planning Department. The recommendation of a PRIMP is based on the conclusions stated above. The specific guidelines contained within a PRIMP are listed below, which are consistent with the provisions of CEQA, the County of Riverside, and the guidelines of the Society of Vertebrate Paleontology (2010) for any mass grading and excavation-related activities, including utility trenching, during construction within the project. Paleontological monitoring may be reduced based upon the observations and recommendations of the County-approved project paleontologist. The following list provides the required items typically expanded upon in PRIMPs submitted to the County of Riverside:

1. Description of the proposed site and planned grading operations.
2. Description of the level of monitoring required for all earthmoving activities in the project area.
3. Identifications and qualifications of the qualified paleontological monitor to be employed for grading operations monitoring.
4. Identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for the recovery of large specimens.
5. Direction for any fossil discoveries to be immediately reported to the property owner, who in turn, will immediately notify the County of Riverside of the discovery.
6. Means and methods to be employed by the paleontological monitor to quickly salvage fossils as they are unearthed to avoid construction delays.

7. Sampling of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates.
8. Procedures and protocol for collecting and processing samples and specimens.
9. Fossil identification and curation procedures to be employed.
10. Identification of the permanent repository to receive any recovered fossil material.
11. All pertinent exhibits, maps, and references.
12. Procedures for reporting finding.
13. Identification and acknowledgement of the developer for the content of the PRIMP, as well as acceptance of financial responsibility for monitoring, reporting, and curation fees.
14. All reports shall be signed by the project paleontologist

Implementation of PALEO MM-1 would ensure the proper identification and subsequent treatment of any significant paleontological resource, site, or unique geologic feature that may be encountered during ground-disturbing activities associated with Project excavation activities on the Project site. With implementation of PALEO MM-1, the Project's potential to impact paleontological resources on the Project site would be reduced to less than significant.

Mitigation:

PALEO-1 MM: The project paleontologist retained shall review the approved development plan and grading plan and shall conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the project paleontologist in Paleontological Resource Impact Mitigation Program (PRIMP]. This PRIMP shall be submitted to the County Geologist for review and approval prior to issuance of a Grading Permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standard and Society of Vertebrate Paleontology standards, are as follows:

1. Description of the proposed site and planned grading operations.
2. Description of the level of monitoring required for all earth-moving activities in the project area.
3. Identification and qualifications of the qualified paleontological monitor to be employed for grading operations monitoring.
4. Identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for recovery of large specimens.
5. Direction for any fossil discoveries to be immediately reported to the property owner who in turn will immediately notify the County Geologist of the discovery.
6. Means and methods to be employed by the paleontological monitor to quickly salvage fossils as they are unearthed to avoid construction delays.
7. Sampling of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates.
8. Procedures and protocol for collecting and processing of samples and specimens.
9. Fossil identification and curation procedures to be employed.
10. Identification of the permanent repository to receive any recovered fossil material. The County of Riverside must be consulted on the repository/museum to receive the fossil material and a written agreement between the property owner/developer and the repository must be in place prior to site grading.
11. All pertinent exhibits, maps and references.
12. Procedures for reporting of findings.
13. Identification and acknowledgement of the developer for the content of the PRIMP as well as acceptance of financial responsibility for monitoring, reporting and curation fees.

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

All reports shall be signed by the project paleontologist and all other professionals responsible for the report's content (e.g., Professional Geologist), as appropriate. Two wet-signed original copies of the report(s) shall be submitted to the office of the County Geologist along with a copy of this condition and the grading plan for appropriate case processing and tracking. These documents should not be submitted to the project Planner, the Plan Check staff, the Land Use Counter or any other County office. In addition, the applicant shall submit proof of hiring (i.e. copy of executed contract, retainer agreement, etc.) a project paleontologist for the in-grading implementation of the PRIMP.

Monitoring:

PALEO MM-A: Monitoring, if necessary, will be in accordance with the approved PRIMP.

Level of Significance After Mitigation

Implementation of Mitigation Measure PALEO-1 MM would reduce all potential significant unavoidable impacts on biological resources below a level of significance.

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

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

Findings of Fact:

a) No Impact. Under existing conditions, the Project site is comprised of agricultural land with planted date trees and with no residential structures. Therefore, development of the Project would not displace any housing or displace any people and thus would not necessitate the construction of replacement housing elsewhere. No impact would occur.

b) No Impact. The Project entails the proposed development of a QCP Fabrication Facility including 100 employees. It is anticipated that the employment base for both the construction and operational phases of the proposed Project would come from the existing population in Riverside County. According to the Bureau of Labor Statistics, in October 2024, the Riverside-San Bernardino-Ontario region's civilian labor force was 2,185,800 persons with 2,065,800 persons employed and 120,000 persons unemployed, for an unemployment rate of 5.5 percent (USBLS, 2024). The anticipated jobs generated as part of the Project could be filled from the local area, as the surrounding area contains an ample supply of potential employees. Therefore, it is not anticipated that the labor demand caused by the proposed Project would result in the addition of residents within Riverside County or surrounding jurisdictions, or trigger the need for affordable housing. Therefore, the Project is not

expected to be a catalyst for any population growth and no impact associated with population projections or affordable housing needs would occur.

c) No Impact. As discussed above in Threshold 29(b), the Project entails the proposed development of a QCP Fabrication Facility including 100 employees . The Project site would not directly generate a residential population. It is anticipated that the employment base for both the construction and operational phases of the proposed Project would come from the existing population in Riverside County. According to the Bureau of Labor Statistics, in October 2024, the Riverside-San Bernardino-Ontario region's civilian labor force was 2,185,800 persons with 2,065,800 persons employed and 120,000 persons unemployed, for an unemployment rate of 5.5 percent (USBLS, 2024). The anticipated jobs generated as part of the Project could be filled from the local area, as the surrounding area contains an ample supply of potential employees. Therefore, it is not anticipated that the labor demand caused by the proposed Project would result in the addition of residents within Riverside County or surrounding jurisdictions, or trigger the need for affordable housing. Therefore, the Project is not expected to be a catalyst for any population growth and no impact associated with population projections or affordable housing needs would occur.

The on-site employment generation would not induce substantial growth in the area because it is anticipated that the Project's future employees would already be living in the Riverside County area. The Project does not propose the construction of any new homes or dwelling units that would directly result in the introduction of new residents to the area. Indirect population growth has the potential to occur when infrastructure improvements are proposed. Increased road access and availability of utility connections are a byproduct of the proposed Project. However, the proposed improvements are specific to the Project and Project-related improvements would not extend beyond the Project site's frontage. The Project would not improve any roadways beyond what was already planned by the County of Riverside. Surrounding property that would have access to or benefit from such improvements have a General Plan land use designation of LI and M-SC Zoning. Riverside County has planned for residential uses in this area and future inhabitants would most likely come from within the County for the same reasons as those discussed for this Project. Accordingly, the proposed Project would have no impact related to directly or indirectly inducing substantial population growth in the area.

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	☐	☐	☒	☐

Source(s): Riverside County General Plan Safety Element

Findings of Fact:

a) Less Than Significant Impact. The Project site receives fire protection services from the Riverside County Fire Department (RCFD). Development of the Project site with a QCP Fabrication

Facility has the potential to increase the frequency of fire protection calls to the site. RCFD Station 79 is the closet fire station to the Project site located at 1377 6th St, Coachella, CA 92236, is approximately 1.45 miles north of the Project site. The next nearest station is RCFD Station 39 located approximately 3.25 miles to the southeast of the site at 86911 58th Ave, Thermal, CA 92274 (RCFD, n.d.; Google Earth Pro, 2021). To ensure adequate fire protection for all residents of Riverside County, the Riverside County Department of Building and Safety and the RCFD enforce fire standards as they review building plans and conduct building inspection and review structures for compliance with the California Code, including Public Resources Code Sections 4290-4299 and California Government Code Section 51178 that address fire safety and Riverside County Ordinance No. 787 (Fire Code Standards) (Riverside County, 2017d, p. 4.17-23).

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

Applicable Regulatory Requirements

- Prior to building permit inspection, the Project Applicant is required to comply with the County's DIF Ordinance (Riverside County Ordinance No. 659), which requires payment of a development mitigation fee to assist in providing revenue that the County can use to improve public facilities and/or equipment, to offset the incremental increase in the demand for public services, including the need for fire protection services that would be created by the Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

31. Sheriff Services	☐	☐	☒	☐

Source(s): Riverside County General Plan

Findings of Fact:

a) Less Than Significant Impact. The Project site receives police protection services from the Riverside County Sherriff Department (RCSD). Development of the Project site with a QCP Fabrication Facility has the potential to increase the frequency of sheriff calls to the site due to the addition of structures, traffic, and workers. The RCSD Perris Station, located at 86625 Airport Blvd, Thermal, CA 92274 (2.88 miles southeast of the Project site) would provide sheriff services to the Project site and vicinity of the site. As discussed in Riverside County General Plan Update, Draft EIR No 521, in terms of changes to existing levels of service, localized development increases would incrementally create demand for additional law enforcement personnel and services in specific areas; however, none of the increases would trigger the need for new or improved facilities in order to meet the demand. The additional personnel (officers, supervisors, and support staff), equipment and vehicles necessary could readily be accommodated by existing facilities. In addition, the Project would comply with the existing regulatory policies and General Plan policies that would further reduce any

impacts to law enforcement services associated with the Project to less than significant levels. (Riverside County, 2015b, pp. 4.17-34-35).

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

32. Schools ☐ ☐ ☒ ☐

Source(s): School District correspondence, GIS database

Findings of Fact:

a) Less Than Significant Impact. Because the subject property would be developed with non-residential uses that would not directly generate any school-aged children requiring public education, development of the subject property with a QCP Fabrication Facility would not create a direct demand for public school services, nor would it indirectly draw a substantial number of students to the area for the reasons discussed above. In summary, jobs and housing data presented in Appendix F-1 to Riverside County General Plan Update (GPA No. 960) demonstrates that future employees of the Project would primarily consist of existing County residents; as such, the Project would not affect the existing or projected housing supply, and thus it would not generate a school-aged population in the County (Riverside County, 2015a, Appendix F-1, pp. 8-9). As such, the proposed Project would not directly cause, physically alter or contribute to a need to construct new public school facilities. Therefore potential impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

33. Libraries ☐ ☐ ☒ ☐

Source(s): Riverside County General Plan

Findings of Fact:

a) Less Than Significant Impact. Development of the Project site with a QCP Fabrication Facility and associated site improvements would not directly create a demand for public library facilities and would not directly result in the need to modify existing or construct new library buildings. Demand placed on libraries is based on the generation of a resident population associated with a person's place of residence, and not typically their place of employment. As discussed above, based on the County wide jobs and housing data presented in Appendix F-1 to Riverside County General Plan Update (GPA No. 960), the Project would not result in an increase in the County's population and would therefore not directly result in an increased demand for library facilities (Riverside County, 2015a, Appendix F-1, pp. 8-9). Accordingly, Project-related impacts to library facilities would be less than significant. There are no other public services for which Project-related service demands would have the potential to physically impact public facilities. The Project Applicant would be required to comply with the County's DIF Ordinance (Riverside County Ordinance No. 659) which requires a fee payment by developers for the funding of public facilities, including public libraries and other public facilities (Riverside County, 2015d).Impacts would be less than significant.

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

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

34. Health Services	☐	☐	☒	☐

Source(s): Riverside County General Plan

Findings of Fact:

a) Less Than Significant Impact. As indicated above, based on the jobs and housing data presented in Appendix F-1 to Riverside County General Plan Update (GPA No. 960), implementation of the proposed Project is not anticipated to result in an increase in the County's population because Riverside County as a whole has an abundance of housing relative to jobs (Riverside County, 2015a, Appendix F-1, pp. 8-9). As such, it is not anticipated that the proposed Project would result in a substantial increase in demand for public and/or private health care facilities. Moreover, the provision of private health care, which serves a majority of County residents, is largely based on economic factors and demand and is beyond the scope of analysis required for this MND. Nonetheless, the Project could result in an incremental increase in demand for health services associated with the Project's addition of employees in the area. Existing public health facilities would accommodate nominal increases in demand, such as demand from the Project. Project implementation would not result in or require the physical construction, expansion, or alteration of public health facilities; therefore, impacts would be less than significant. The Project Applicant would be required to comply with the County's DIF Ordinance (Riverside County Ordinance No. 659), which requires a fee payment by developers for the funding of public facilities, including public health facilities (Riverside County, 2015d)

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

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

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

Findings of Fact:

a) No Impact. The Project does not propose to construct any recreational facilities; therefore, no impacts from proposed recreational facilities would result from the Project.

b) No Impact. The Project proposes a QCP Fabrication Facility land use that would not directly result in an increase in the County's population. Although the jobs generated by the Project have the potential to result in some new residents within the County, it is expected that a majority of the jobs created would be filled by existing County residents. As such, the Project would not result in a substantial increase in demand for the construction or expansion of recreational facilities, and no impact would occur.

c) No Impact. The Project is not located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees) therefore, no impacts would result from the Project.

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

Findings of Fact:

a) No Impact. There are no planned recreation trails in proximity to the Project site (Riverside County, 2016b, Figure C-6; Google Earth Pro, 2021). No trail system nor recreational facilities are proposed as part of the Project. Thus, the Project would not result in the use of existing recreational trails that could have a significant environmental effect. 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)?	☐	☐	☒	☐
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, Quick Crete Products (QCP) Trip Generation Assessment for the proposed QCP Fabrication Facility Plot Plan, Urban Crossroads, (December, 2025).

Findings of Fact:

a/b) Less Than Significant Impact. In accordance with Senate Bill (SB) 743, the California Natural Resources Agency (CNRA) adopted changes to the CEQA Guidelines in December 2018, which identify that starting on July 1, 2020, vehicle miles traveled (VMT) is the appropriate metric to evaluate a project's transportation impacts. As of December 2018, when the revised CEQA Guidelines were adopted, automobile delay, as measured by "level of service" (LOS) and other similar metrics, no longer constitutes a significant environmental effect under CEQA. Lead agencies in California are required to use VMT to evaluate project-related transportation impacts. Nonetheless, The Project site is currently vacant and generates no traffic.

The Project is designed to accommodate pedestrians via sidewalk improvements along its frontage on 54th Avenue. The Project will provide access to Avenue 54 via two proposed gated entrances. The west gate will be restricted to right in-right out access only, whereas the east gate will allow westbound left turns into the site for both passenger car and truck access. All Project driveway exits are designed to be stop-sign controlled and sight distances at each Project driveway will be reviewed by the County of Riverside at the time improvement plans are submitted as part of the building permit stage of Project implementation in order to ensure that sight distance meets minimum County safety standards.

The Project site is served by the Sunline Transit Agency (STA), a public transit agency serving the Coachella Valley region. STA Route 8 traverses directly along the Project site's frontage. Because there are existing public transit facilities along the Project site frontage, and existing bus stops are within walking distance to the Project site, the Project has no potential to conflict with a transit service program. A less than significant impact would occur.

CEQA Guidelines section 15064.3 sets forth guidelines for implementing Senate Bill 743 (SB 743). SB 743 requires amendments to the CEQA Guidelines (pre-2020) to provide an alternative to LOS for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (Public Resources Code Section 21099 (b)(1).) Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

As specified in Appendix B of the County's Transportation Analysis Guidelines, certain types of development proposals are generally exempt from the requirement to prepare a Level of Service transportation impact analysis, including the following:

> *10. Any use which can demonstrate, based on the most recent edition of the Trip Generation Report published by the Institute of Transportation Engineers (ITE) or other approved trip generation data, trip generation of less than 50 vehicle trips during the peak hours.*

These exemptions will apply in most cases, however, the Transportation Department reserves the right to require a traffic analysis for any development regardless of size and/or type.

Table 22 Project Trip Generation

Land Use	ITE LU Code	Quantity	AM Peak Hour	PM Peak Hour	Peak Hour Total	Daily
Manufacturing (Processing) & Administration	140	100 Employees	15	9	24	210
Total	___	_____	15	9	**24**	**210**

A Quick Crete Products (QCP) Trip Generation Assessment for the proposed QCP Fabrication Facility Plot Plan was prepared by Urban Crossroads. That analysis forecast the project to generate approximately 210 daily trips, including 24 peak hour trips. The County Guidelines indicate that any development project that is expected to generate more than 50 peak hour trips would likely require the preparation of a localized transportation assessment. The proposed Project is anticipated to generate fewer than 50 net new peak hour trips during the morning and evening peak hours (with 15 AM peak hour trips and 9 PM peak hour trips). As such, additional peak hour traffic operations analyses are not necessary based on the County Guidelines and the findings summarized in the Trip Generation Assessment for the proposed QCP Fabrication Facility Plot Plan. Therefore the Proposed Project would have a less than significant impact.

c) Less Than Significant Impact. The Project site is located in a portion of Riverside County in Thermal that is developing as an employment center, containing tourist commercial, residential and light industrial land uses. As described in Section 2.0, the Project site is bound on the north by 54th Avenue. The Riverside County General Plan and EVAP designate surrounding properties west, south and east of the Project site as LI (Light Industrial). North of 54th Avenue is (City of Coachella) designated as R-1. According to County Ordinance No. 625, these uses do not meet the definition of agricultural activity. Also, the Project is not incompatible with surrounding uses.

As described in Section 3.0, the Project Applicant would be required to construct AC pavement, driveway, sidewalk, curb and gutter along its frontage with 54th Avenue. All Project driveways are designed to be stop-sign controlled and sight distances at each Project driveway will be reviewed by the County of Riverside at the building permit stage of Project implementation at the time the roadway improvement plans are submitted in order to ensure that sight distance meets minimum County safety standards.

The types of traffic generated by the Project (i.e., mostly passenger cars and trucks with some commercial truck activity) would be compatible with the type of existing traffic on Project area roadways. In addition, proposed roadway improvements along the Project site frontage would occur within the existing and planned public rights-of-way and be installed following County design standards. The County of Riverside Transportation Department will review the Project's Plot Plan application materials and determine that no hazardous transportation design features would be introduced by the Project. All improvements planned as part of the Project would be in conformance with applicable Riverside County roadway standards, and would not result in any hazards due to a design feature and would not result in inadequate emergency access. Therefore, impacts would be less than significant.

d) Less Than Significant Impact. As described in Section 2.0, the proposed Project would make improvements to the public street along the Project site's frontage on 54th Avenue. This improved roadway would require routine, intermittent maintenance; however, maintenance of public streets along the Project's frontage on 54th Avenue would not result in any significant impacts to the

environment. The Project would contribute traffic to off-site public roadways; however, public roads require periodic maintenance as part of their inherent operational activities, and such maintenance would not result in substantial impacts to the environment. Public roadway maintenance would be funded through the Project Proponent's payment of DIF (Development Impact Fee Program) and the Project site owner(s) future payment of property taxes. Maintenance of roads would not result in any new impacts to the environment beyond that which is already disclosed and mitigated by this MND. Therefore, the Project's potential to cause an effect upon, or a need for new or altered maintenance of roads, would be less than significant

e) Less Than Significant Impact. During the construction phase of the Project, traffic to and from the Project site would be generated by activities such as construction employee trips, delivery of construction materials, and use of heavy equipment. Vehicular traffic associated with construction employees would be substantially less than daily and peak hour traffic volumes generated during Project operational activities, especially because construction activities typically begin and end outside of the peak hour; therefore, a majority of the construction employees would not be driving to or from the Project site during hours of peak congestion. Traffic volumes from construction workers is not expected to result in a substantial adverse effect to the local roadway system because most trips would occur during non-peak hours. Deliveries of construction materials to the Project site would also have a nominal effect to the local roadway network because most trips would occur during non-peak hours.

Construction materials would be delivered to the site throughout the construction phase based on need and would not occur on an everyday basis. Heavy equipment would be utilized on the Project site during the construction phase. Because most heavy equipment is not authorized to be driven on public roadways, most equipment would be delivered and removed from the site via flatbed trucks. As with the delivery of construction materials, the delivery of heavy equipment to the Project site would not occur on a daily basis, but would occur periodically throughout the construction phase on need. 54th Avenue would remain open with no reasonably foreseeable lane closures. Therefore, the Project's potential to cause an effect upon circulation during the Project's construction would be less than significant.

f) Less Than Significant Impact. The Project site does not provide access to any abutting parcels or nearby uses. Therefore, there is no potential for the Project to result in inadequate emergency access or access to nearby uses. During the course of the County of Riverside's review of the proposed Project, the County will evaluate the Project's design, including but not limited to, the layout of the Project's proposed QCP Fabrication Facility buildings, drive aisles, and parking lots to ensure that the Project would provide adequate emergency access and access to nearby uses at Project buildout. Furthermore, as described above, the Project would provide adequate emergency access along the abutting roadway during temporary construction activities within the public right-of-way. In addition, the proposed Project would be required to comply with Riverside County Ordinance No. 461.11 which regulates access road provisions. With required adherence to County requirements for emergency access, impacts would be less than significant.

Project Design Requirements

- Prior to issuance of building permits, the Project Applicant would be required to pay appropriate Development Impact Fee Program (DIF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 659.
- Prior to final building inspection, the Project Applicant would be required to pay appropriate Coachella Valley Association of Governments (CVAG) Transportation

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

Uniform Mitigation Fee Program Ordinance (TUMF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 673.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): Riverside County General Plan

Findings of Fact:

a) Less Than Significant Impact. The Project is proposing to construct site adjacent roadway improvements on the southern side of 54th Avenue, including sidewalk and bicycle lanes. However, impacts associated with the roadway improvement is inherent to the Project's construction phase, and such impacts have been evaluated throughout this EIS. Where significant impacts have been identified, feasible mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no impacts associated with the bike lane installation not already addressed herein. As such, impacts would be less than significant.

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): Native American Consultation, BFSA Environmental Services.

Findings of Fact:

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.

a) Less Than Significant Impact. An archaeological records search for the project and the surrounding area within a one-mile radius was requested from the SCIC at SDSU on October 22, 2024. However, according to the SCIC response, "Riverside records search requests are not being processed at this time. Processing Riverside requests will resume once the SCIC receives the Riverside archive (date currently unknown)" (see Appendix B).Therefore, no record search data is available at the time of the completion of this report. An updated report will be provided to the County of Riverside once the data is available. BFSA reviewed the following sources to help facilitate a better understanding of the historic use of the property:

- The NRHP Index
- BLMGLO records
- 1904 Indio, California USGS map (30-minute)
- 1943 and 1956 Coachella, California USGS maps (15-minute)
- 1956 Indio, California USGS map (7.5-minute)
- Aerial photographs (1953 through 2024)

These sources did not indicate the presence of historic resources within the project. Based upon historic aerial photographs, the property was historically vacant and repeatedly cleared. Although no structures are visible within the property, the aerial photographs from 1953 to1984 do illustrate that the northwest corner of the property contained trees and possibly a yard associated with a residence and ranch complex on the adjacent property to the west. Structures associated with this adjacent complex are first visible on the 1943 Coachella USGS Quadrangle. Subsequent photographs show the repeated clearing of the project property between 2006 and2009 when agricultural rows are visible. By 2011,small palm trees are visible along the rows and subsequent photographs show the steady growth of the trees. Although a review of the maps and aerial photographs does not indicate the presence of any historic resources within the subject property, the absence of positive results does not necessarily indicate the absence of historic resources. When available, the records search results may still indicate the presence of recorded sites in the vicinity of the project or within the project itself. The records search request and SCIC response letter are provided in Appendix B of the BFSA report. Impacts are anticipated to be less than significant.

In compliance with Assembly Bill 52 (AB52), a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the Project site. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites notices regarding this project were mailed to all requesting tribes on November 8, 2024. No response was received from any of the groups, these include: the Agua Caliente Band of Cahuilla Indians, the Augustine Band of Cahuilla Indians, the Pechanga Band of Luiseno Indians, Rincon Band of Luiseno Indians, Soboba Band of Indians, Cahuilla Band of Indians, Ramona Band, Morongo Band, San Manuel Band, the Torres-Martinez Band of Cahuilla Indians Twenty-Nine Palms Band, Cabazon Band, Colorado River Indian Tribes, the Quechan Nation or the Pala Band of Mission Indians.

No consultation regarding this project was requested and no tribal cultural resources were identified. Because there are no Tribal Cultural Resources present, there will be no impacts in this regard. Overall, impacts are anticipated to be less than significant.

b) Less Than Significant Impact with Mitigation Incorporated. The Phase I cultural resources study for the QCP Fabrication Facility Project did not identify any cultural resources within the subject property. However, the property has been impacted by clearing and agricultural use. This characterization of the property as superficially disturbed is relevant to the consideration of cultural resources being present within the project. When parcels are cleared, disked, or otherwise disturbed, evidence of surface artifact scatters is lost. As such, the current state of the area appears to have affected the potential to discover any surface scatters of artifacts. Therefore, given the limited records search availability, prior impacts to the property, limited visibility at times during the field survey, and the proximity to known features exploited by the prehistoric inhabitants of the area such as Lake Cahuilla and the Whitewater River, there remains the potential for the inadvertent discovery of archaeological resources during grading. As such, it is recommended that all earthwork required for development be monitored by a qualified archaeologist and a Native American representative. With implementation of TCR-1 MM, the Project's potential to impact Tribal Cultural resources on the Project site would be reduced to less than significant.

Mitigation:

TCR-1 MM: Tribal Cultural Resource Monitor(s) for this Project will be employed for any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the requesting Tribal Historic Preservation Office (if requested), and other consulting tribal preservation offices requesting same.

Monitoring:

TCR MM-A: At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the Riverside County Planning Department documenting monitoring activities conducted by the project Archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the consulting tribes and Eastern Information Center and interested tribes.

Level of Significance After Mitigation

Implementation of Mitigation Measure TCR-1 MM would reduce all potential significant unavoidable impacts on biological resources below a level of significance.

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	☐	☐	☒	☐

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

Source(s): Project Application Materials, Coachella Water Authority (CWA).

Findings of Fact:

a) Less Than Significant Impact. The Proposed Project will be connected to the existing domestic water pipelines. Water demand associated with the proposed Project would consist of water used in the concrete process as well as interior plumbing devices (e.g., sinks, toilets, faucets) and outdoor landscape irrigation. The Project's water and sewer lines would be connected to existing lines in 54th Avenue. Stormwater would be directed to a 32,085 square foot detention basin in the south portion of the Project site. Potential impacts associated with the installation of on-site and off-site utility improvements are evaluated throughout this MND and mitigation measures are identified for construction-related effects that would reduce construction-phase impacts to the maximum feasible extent. There would be no significant impacts specifically related to the installation of water, wastewater, or storm drain infrastructure beyond the overall construction-related effects of the Project as a whole. Impacts would be less than significant

b) Less Than Significant Impact. The Coachella Water Authority (CWA) is responsible for supplying potable water to the Project site and its region. The Project would be consistent with Riverside County's General Plan land use designation (CR). According to CWA's Water System Planning & Design, commercial and industrial development have the same average day water demand rate (2,000 gpd per acre) (CWA, 2007, p. 4). As discussed in the 2015 Coachella Valley Water District (CVWD) Urban Water Management Plan, herein incorporated by reference as the "UWMP," which applies to and was adopted by the CWA, adequate water supplies are projected to be available to meet CWA's estimated water demand through 2040 under normal, historic single-dry and historic multiple-dry year conditions (CWA, 2016a, p. XV). CWA forecasts for projected water demand are based on the population projections of SCAG, which rely on the adopted land use designations contained within the general plans that cover the geographic area within CWA's service. Because the Project's water demand would be identical to the projection for the site's existing land use designation (as mentioned above), CWA would have sufficient water supplies available to serve the Project from existing entitlements/resources and no new or expanded entitlements are needed.

Pursuant to CEQA Guidelines Section 15155 (a)(1)(E), a Water Supply Analysis is not required for the proposed Project because the Project does not involve a land use that would house more than 1,000 persons, occupy more than 40 acres of land, or have more than 650,000 SF of floor area. Therefore, impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				

Source(s): Department of Environmental Health Review
Findings of Fact:

a) Less Than Significant Impact. The Project's sewer lines would be connected to existing lines in 54th Avenue. The installation of sewer lines and connections as proposed by the Project would result in physical impacts; however, these impacts are considered to be part of the Project's construction phase and are evaluated throughout this MND accordingly. In instances where significant impacts have been identified for the Project's construction phase, mitigation measures are recommended in each applicable subsection of this MND to reduce impacts to less-than-significant levels. The construction of sewer lines necessary to serve the proposed Project would not result in any significant physical effects on the environment that are not already identified and disclosed as part of this MND. Accordingly, additional mitigation measures beyond those identified throughout this MND would not be required. Impacts would be less than Significant.

b) Less Than Significant Impact. Wastewater generated by the Project would be treated by the CWA, which has a 12-inch line in 54th Avenue and operates the Wastewater Treatment Plant (WWTP) at 54th Avenue & Polk Street. In total, CWA has a current capacity of 4.5 million gallons per day (gpd). According to information available from the CVWD (which is relied upon by CWA), commercial and industrial development have the same average day water demand rate (1,700 gpd per acre) per acre of wastewater for industrial fabrication uses, so the proposed Project would generate approximately 34,000 gallons (0.034 million gallons) of wastewater per day (1,700 gpd per acre × 19.01 Project acres = 34,000 gpd). Accordingly, the CWA the existing capacity of Avenue 54 WWTP has sufficient capacity to treat wastewater generated by the Project. The Project would not create the need for any new or expanded wastewater facility (such as conveyance lines, treatment facilities, or lift stations). Because there is adequate capacity at existing treatment facilities to serve the Project's projected sewer demand, 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): Riverside County General Plan, Riverside County Waste Management District correspondence

Findings of Fact:

a) Less Than Significant Impact. Implementation of the proposed Project would generate an incremental increase in solid waste volumes requiring off-site disposal during short-term construction and long-term operational activities. The Project would be required to comply with AB 939, which requires a minimum of 50 percent of all construction waste and debris to be recycled. Additionally, the Project would be required to comply with mandatory waste reduction requirements as described below. Solid waste generated by the Project would be disposed at the Lamb Canyon Sanitary Landfill, El Sobrante Landfill and/or, the Badlands Sanitary Landfill. Existing capacities at each of these landfills is discussed below and shown on Table 23, Permitted and Remaining Capacity of Area Landfills, shows the maximum daily capacity and total remaining capacity for these landfills.

Table 23 Permitted and Remaining Capacity of Area Landfills

Landfill	Maximum Capacity (Tons/Day)	Maximum Permitted Capacity (Cubic Yards)	Remaining Capacity (Cubic Yards)
Lamb Canyon	5,000	38,935,653	19,242,9502
El Sobrante	16,054	209,910,000	143,977,1701
Badlands	4,800	34,400,000	15,748,7993

1 Remaining capacity as of April 1, 2018, which is the most recent information reported by CalRecycl. (CalRecycle, 2019a)

Construction Impacts Analysis

Solid waste requiring disposal would be generated by the construction process, primarily consisting of discarded materials and packaging. Based on the size of the Project (86,750 SF of buildings) and the United States Environmental Protection Agency's (U.S. EPA) construction waste generation factor of 4.34 pounds per square foot for non-residential uses, approximately 187.95 tons of waste is expected to be generated during the Project's construction phase (EPA, 2009, p. 10). California Assembly Bill 939 (AB 939) requires that a minimum of 50% of all solid waste be diverted from landfills (by recycling, reusing, and other waste reduction strategies). The Project's construction phase is estimated to last for up to 400 days; therefore, the Project is estimated to generate approximately 0.47 tons of solid waste per day during its construction requiring landfill disposal.

Non-recyclable construction waste generated by the Project would be disposed at the Lamb Canyon Sanitary Landfill, El Sobrante Landfill, and/or the Badlands Sanitary Landfill. As described above, these landfills receive well below their maximum permitted daily disposal volume; thus, the relatively minimal construction waste generated by the Project is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume. Furthermore, the Lamb Canyon Sanitary Landfill, El Sobrante Landfill, and/or the Badlands Sanitary Landfill are not expected to reach its total maximum permitted disposal capacities during the Project's construction period. The Lamb Canyon Sanitary Landfill, El Sobrante Landfill, and/or the Badlands Sanitary Landfill have sufficient daily capacity to accept solid waste generated by the Project's construction phase; therefore, impacts to landfill capacity associated with the Project's near-term construction activities would be less than significant.

Operational Impact Analysis

Table 24 Estimated Solid Waste Disposal at Project Buildout

Proposed Land Use	Riv Co Disposal Rates	Proposed	Solid Waste Disposal (pounds per day)	Solid Waste Disposal (tons per year)
Light Industrial	41.64/lb/employee/day	100	4,164	520.05
Total	.		(with 50% diversion)	**260.25**

Non-recyclable solid waste generated during long-term operation of the Project would be disposed at the Lamb Canyon Sanitary Landfill, El Sobrante Landfill, and/or the Badlands Sanitary Landfill. As described above, these landfills receive well below their maximum permitted daily disposal volume; thus, waste generated by the Project's operation is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume. Because the Project would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities at receiving landfills, impacts to regional landfill facilities during the Project's long-term operational activities would be less than significant.

b) Less Than Significant Impact. The California Integrated Waste Management Act (AB 939), signed into law in 1989, established an integrated waste management system that focused on source reduction, recycling, composting, and land disposal of waste. In addition, the bill established a 50 percent waste reduction requirement for cities and counties by the year 2000, along with a process to ensure environmentally safe disposal of waste that could not be diverted. Per the requirements of the Integrated Waste Management Act, the Riverside County Board of Supervisors adopted the County of Riverside Countywide Integrated Waste Management Plan (CIWMP), which outlines the goals, policies, and programs the County and its cities implement to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates. (Legislative Counsel Bureau of California, 2015).

In order to assist the County of Riverside in achieving the mandated goals of the Integrated Waste Management Act, the Project's building tenant(s) would be required to work with future refuse haulers to develop and implement feasible waste reduction programs, including source reduction, recycling, and composting. Additionally, in accordance with the California Solid Waste Reuse and Recycling Act of 1991 (Public Resources Code § 42911), the Project is required to provide adequate areas for collecting and loading recyclable materials where solid waste is collected. The collection areas are required to be shown on construction drawings and be in place before occupancy permits are issued. (Legislative Counsel Bureau of California, 2005) Additionally, in compliance with AB 341 (Mandatory Commercial Recycling Program), the future occupant(s) of the proposed Project would be required to arrange for recycling services, if the occupant generates four (4) or more cubic yards of solid waste per week (Legislative Counsel Bureau of California, 2011). The implementation of these mandatory requirements would reduce the amount of solid waste generated by the Project and diverted to landfills, which in turn will aid in the extension of the life of affected disposal sites. The Project would be required to comply with all applicable solid waste statutes and regulations; as such, impacts related to solid waste statutes and regulations 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
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 Companies

Findings of Fact:

a-f) Less Than Significant Impact. The proposed Project would include connections to existing electricity, natural gas, and communications infrastructure that already exist in the area, and all such connections would be accomplished in conformance with the rules and standards enforced by the applicable service provider. Impacts associated with the construction and operation of electricity, natural gas, communications systems, street lighting, public facilities maintenance, and other governmental services are an inherent part of the Project's construction process and operational characteristics, and the environmental effects associated with the Project's construction phase have been evaluated throughout this MND. Mitigation measures have been identified to reduce construction- and operational-related impacts to the maximum feasible extent. There are no unique conditions associated with the Project's proposed utility service connections that would result in impacts to the environment that have not already been addressed by this MND. Impacts would be less than significant. Refer to Threshold 37(d) for the analysis of the maintenance of roads.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

WILDFIRE If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:				
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	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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", GIS database, Project Application Materials

Findings of Fact:

a-e) No Impact. CAL FIRE adopted Fire Hazard Severity Zone (FHSZ) maps for State Responsibility Areas (SRAs) in November 2007. The fire hazard model considers the wildland fuels. Fuel is that part of the natural vegetation that burns during the wildfire. The model also considers topography, especially the steepness of the slopes. Fires burn faster as they burn up-slope. Weather (temperature, humidity, and wind) has a significant influence on fire behavior. The model recognizes that some areas of California have more frequent and severe wildfires than other areas. Finally, the model considers the production of burning fire brands (embers) how far they move, and how receptive the landing site is to new fires. All SRAs are rated moderate, high or very high fire hazard. (CAL FIRE, 2012a).

According to the Riverside County General Plan Update Draft EIR No. 521, as analyzed by the State Multi-Hazard Mitigation Plan (MHMP), there are three types of fires. Urban fires tend to be of limited extent such as a single building or a block, wildland fires generally occur in open lands, vegetated, and undeveloped, but can occur with some homes in them, and wildland-urban interface (WUI) fires occur in the most hazardous and risky areas where the environment extends into open areas, resulting in a complex mixture of fuels, properties, and threats. (Riverside County, 2015b, p. 4.13-38) As discussed in Section 3.0, the Project site is located in a developed area of Riverside County and is therefore not located in any of these areas that are subject to wildland fires.

According to CAL FIRE adopted FHSZ maps for SRAs, the Project site is not located within an FHSZ in an SRA (CAL FIRE, 2007a) (CAL FIRE, 2012a). Also, as shown in East Valley Area Plan Figure 13, Wildfire Susceptibility, the Project site is not located in a State Responsibility Area/Federal Responsibility Area or a Local Responsibility Area (LRA) (Riverside County, 2016a, Figure 12).

The Project site is located adjacent to land uses that do not pose a high fire risk as well as being bound by the roadway of 54th Avenue. The Project site is not located in or adjacent to a State Responsibility Area (SRA), nor is the Project site classified as a very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief (CAL FIRE, 2007a; CAL FIRE, 2012a; ALUC, 2011). Because the Project site is not located in an SRA, the Project is not subject to Wildfire Thresholds 44(a) through (e).

In addition, a number of California regulations, including Public Resources Code Sections 4290-4299 and California Government Code Section 51178, would apply to the proposed Project, as well as to every other development project in the area, and would address fire safety. In particular, these sections require minimum State-wide fire safety standards pertaining to: roads for fire equipment access; signage for identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and, fire fuel breaks. In addition, they set fire safety standards for all buildings and structures in, or adjoining, mountainous areas, or forest-, brush- or grass-covered lands or any land covered with flammable material to protect property from wildland fires. Mandatory compliance with California regulations related to fire hazards would reduce the Project's potential to expose people or structures to wildland fire hazard risks. (Riverside County, 2015b, p. 4.17-23).

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

In addition, to ensure adequate fire protection for all residents of Riverside County, the Riverside County Department of Building and Safety and the RCFD enforce fire standards as they review building plans and conduct building inspections. This includes a review for compliance with Riverside County Ordinance No. 787, which requires, among other measures, the County to review all future building plans to ensure that every building is positioned in a way that allows adequate access for emergency vehicles and has adequate fire hydrant placement and fire flows. (Riverside County, 2015b, p. 4.17- 23) No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required

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

Source(s): Staff Review, Project Application Materials

Findings of Fact:

Less Than Significant Impact With Mitigation Incorporated. All impacts to the environment, including impacts to habitat for fish and wildlife species, fish and wildlife populations, plant and animal communities, rare and endangered plants and animals, and historical and pre-historical resources were evaluated as part of this Initial Study. Throughout this Initial Study, where impacts were determined to be potentially significant, mitigation measures have been imposed to reduce those impacts to less than significant. Accordingly, with incorporation of the mitigation measures imposed throughout this Initial Study, the Project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Impacts would be reduced to less than significant levels with mitigation incorporated.

Mitigation: Mitigation is required. Refer to individual thresholds herein and the attached Mitigation, Monitoring, and Reporting Program (MMRP).

Monitoring: Monitoring is required. Refer to individual thresholds herein and the attached Mitigation, Monitoring, and Reporting Program (MMRP).

Applicable Regulatory Requirements. Applicable regulations and design requirements to which the Project is required to comply are included in this Initial Study. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are included herein for information purposes.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
46. Have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?	☐	☒	☐	☐

Source(s): Staff Review, Project Application Materials

Findings of Fact:

Less Than Significant Impact With Mitigation Incorporated. As discussed throughout this Initial Study, implementation of the proposed Project has the potential to result in effects to the environment that are individually limited, but cumulatively considerable. In all instances where the Project has the potential to contribute to a cumulatively-considerable impact to the environment, mitigation measures have been imposed to reduce potential effects to less than significant. Impacts would be reduced to less than significant levels with mitigation incorporated.

Aesthetics
New development on the Project site and in the surrounding area would change the existing character of the Project's viewshed; however, the proposed Project, as well as all development in the immediate vicinity of the Project would be required to comply with the development regulations and design standards contained in the County's Development Code, which would ensure that minimum standards related to visual character and quality are met to preclude adverse aesthetic effects (e.g., size, scale, building materials, lighting). Accordingly, the Project's aesthetic impacts would not be cumulatively-considerable.

Biological Resources
The Project Site is located within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) planning boundary/fee area and outside of a designated conservation area, biological corridor or linkage area. The project applicant shall pay a local development mitigation fee established by the County of Riverside TLMA . The Project will have less than significant impacts.

Cultural Resources
As discussed under Thresholds 8 and 9, Cultural Resources, because previously undiscovered subsurface resources that meet CEQA's definition of a significant archaeological resource have the potential to be uncovered by the Project's ground-disturbing construction activities, mitigation is required. With implementation of mitigation, which is required herein as CUL MM-1 through CUL MM-3, to properly identify and treat resources that may be uncovered during the Project's earth-moving activities, impacts would be reduced to less than significant on a direct and cumulatively considerable basis.

Energy
As discussed under Threshold 10, Energy Impacts, during construction and operation, the Project and other cumulative developments would be subject to regional, State, and federal requirements related to energy consumption, including requirements related to energy efficiency (e.g., Title 24 energy

efficiency requirements) and fuel efficiency. Moreover, energy consumed by the Project is expected be comparable to other light industrial uses of similar scale and intensity that are constructed and operating in California, because the Project does not propose uses or operations that would inherently result in excessive and wasteful energy consumption. There are no components of the warehouse uses proposed by the Project that would result in the inefficient, wasteful, or otherwise unnecessary use of energy resources on either a direct or cumulatively-considerable basis. Additionally, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As such, Project-related impacts due to energy consumption would be less-than-cumulatively considerable.

Geology and Soils

Potential effects related to geology and soils are inherently site-specific; therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact under this topic. Furthermore, all development proposals would be required to comply with applicable federal, State, and local regulations that are in place to preclude adverse geology and soils effects, including effects related to strong seismic ground shaking, fault rupture, soil erosion, and hazardous soil conditions (e.g., liquefaction, expansive soils, landslides). Additionally, the design of the proposed construction of the Project will be in conformance with the latest California Building Code provisions for earthquake design as well as recommendations summarized in Table 6 (GEO-1 MM), subject to County review. Impacts to 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 would be less than significant.

Greenhouse Gas Emissions

As discussed in Threshold 20, Greenhouse Gas Emissions, global climate change (GCC) occurs as the result of global emissions of GHGs. An individual development project does not have the potential to result in direct and significant GCC-related effects in the absence of cumulative sources of GHGs. The CEQA Guidelines also emphasize that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis (See CEQA Guidelines § 15130(f)).

At Project buildout, the Project's total annual GHG emissions would not potentially exceed the Riverside County CAP's annual GHG emissions threshold of 3,000 MTCO2e. With implementation of Project design features, mitigation and adherence to applicable regulations, the Project would not cause a significant impact due to a conflict with the County's CAP and impacts related to GHG emissions would not be cumulatively considerable basis.

Hazards and Hazardous Materials

Potential effects related to hazards and hazardous materials are inherently site-specific; therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact under this topic.

Hydrology and Water Quality

Construction and operation of the Project and other projects in the Whitewater River watershed would have the potential to result in a cumulatively considerable water quality impact, including erosion and sedimentation. However, in accordance with applicable federal, State, and local regulations, all development projects would be required to implement plans during construction and operation (e.g., SWPPP and WQMP) to minimize adverse effects to water quality, which would avoid a cumulatively considerable impact.

The Project and other projects in the Santa Ana River Basin would be required to comply with federal, State, and local regulations in order to preclude flood hazards both on- and off-site. Compliance with

federal, State, and local regulations would require on-site areas to be protected, at a minimum, from flooding during peak storm events (i.e., 100-year storm) and ensure that proposed development projects would not expose downstream properties to increased flooding risks during peak storm events. Accordingly, a cumulatively-considerable effect related to hydrology and water quality would not occur

Land Use and Planning

The Project would not physically divide an established community, or conflict with applicable land use/planning documents and the Project is consistent with the County's land use designation and zoning classifications for the Project site; therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact related to land use and planning.

Mineral Resources

The Project would have no impact on mineral resources. Therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact under this topic.

Noise

Noise levels diminish rapidly with distance; therefore, for a development project to contribute to a noise-related cumulative impact it must be located in close proximity to another development project or source of substantial noise. There are no construction projects in the immediate vicinity of the Project site that would overlap with Project-related construction activities. Accordingly, cumulatively considerable impacts related to periodic noise and construction-related vibration would not occur. Under long-term operating conditions the Project would comply with the County's Noise Ordinance and would not produce noticeable levels of vibration; therefore, cumulatively considerable impacts related to these issue areas would not occur. The analysis under Threshold 27, Noise, demonstrates that the Project would not result in a cumulatively considerable impact related to transportation noise under long-term conditions.

Paleontological Resources

No paleontological resources are identified on or near the Project site; however, grading and excavation activities on the Project site that occur deeper than 4.0 feet in depth in areas of the Project site that are composed of very old alluvial fan sediments (which are mapped by Riverside County as having "High A" paleontological sensitivity), have the potential to unearth paleontological resources that may exist below the ground surface. Similarly, cumulative development in this same geologic formation has the potential to unearth paleontological resources. With implementation of PALEO MM-1, to properly identify and treat resources that may be uncovered during the Project's earth-moving activities, the Project's potential to impact paleontological resources on the Project site would be reduced to less than significant.

Population and Housing

The Project would not implement land uses that generate new residents and would not require the construction of replacement housing. Accordingly, the County has anticipated – and planned for – the growth that would occur on the Project site and there is no potential for the Project to result in an adverse, cumulatively-considerable environmental effect related to population and housing.

Public Services

All development projects in the County of Riverside, including the Project, would be required to pay DIF, a portion of which would be used by the County for the provision of public services to offset the incremental increase in demand for public services which is caused, in part by cumulative development projects. Furthermore, future development would generate an on-going stream of property tax revenue and sales tax revenue, which would provide funds that could be used by the

County for the provision of public services. The Project would not directly result in the introduction of new residents to the County and, therefore, would have no potential to result in cumulatively considerable impacts to resident-serving public facilities such as schools, parks, libraries, and other public facilities or services.

Recreation

The Project would have no impact to recreation facilities. Therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact under this topic.

Transportation

As discussed in Threshold 37, Transportation, the Project's impacts on the transportation network would be less than significant, when taking in to account ambient growth, cumulative projects, and County guidance for VMT analysis which is based on regional transportation data. Therefore, the Project will not contribute a cumulatively considerable impact under this topic.

Tribal Cultural Resources

As discussed in Threshold 39, Tribal Cultural Resources, development activities on the Project site would not impact any known tribal cultural resources. Compliance with tribal consultation requirements required under State law is required by all projects subject to CEQA, which ensures that no cumulatively considerable impact to tribal cultural resources occurs statewide. The County has complied with tribal consultation requirements for the Project and with mitigation. As such, it is recommended that all earthwork required for development be monitored by a qualified archaeologist and a Native American representative. With implementation of TCR-MM 1, the Project's potential to impact Tribal Cultural resources on the Project site would be reduced to less than significant.

Utilities/Service Systems

The Project would require water and wastewater infrastructure, as well as solid waste disposal. Development of public utility infrastructure is part of an extensive planning process involving service providers and jurisdictions with discretionary review authority. The coordination process associated with the preparation of infrastructure plans is intended to ensure that adequate public utility services and resources are available to serve both individual development projects and cumulative growth in the region. Each individual development project is subject to review for utility capacity to avoid unanticipated interruptions in service or inadequate supplies. Coordination with the utility providers would allow for the provision of utility services to the Project and other developments. The Project and other planned projects are subject to connection and service fees to offset increased demand and assist in facility expansion and service improvements (at the time of need). Because of the utility planning and coordination activities described above, cumulatively-considerable impacts to utilities and service systems would not occur.

Wildfire

The Project site is not located in an SRA; therefore, no cumulatively considerable impacts associated with wildfire would occur as a result of development of the Project.

Mitigation:

Mitigation is required. Refer to individual thresholds herein and the attached Mitigation, Monitoring, and Reporting Program (MMRP).

Monitoring:

Monitoring is required. Refer to individual thresholds herein and the attached Mitigation, Monitoring, and Reporting Program (MMRP).

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

Applicable Regulatory Requirements. Applicable regulations and design requirements to which the Project is required to comply are included in this Initial Study. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are included herein for information purposes.

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

Source(s): Staff Review, Project Application Materials

Findings of Fact:

Less Than Significant Impact With Mitigation Incorporated. The Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this Initial Study. In instances where the Project has the potential to result in direct or indirect adverse effects to human beings (air quality and associated effects on human health from air pollutants, and construction-related noise and potential effects on hearing impairment), project design feature best practices and mitigation measures have been applied to ensure impacts do not rise above a level of significance. With required implementation of project design features and the mitigation measures identified in this Initial Study, construction and operation of the proposed Project would not involve any activities that would result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

Mitigation: Mitigation is required. Refer to individual thresholds herein and the attached Mitigation, Monitoring, and Reporting Program (MMRP).

Monitoring: Monitoring is required. Refer to individual thresholds herein and the attached Mitigation, Monitoring, and Reporting Program (MMRP).

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: N/A

Location Where Earlier Analyses, if used, are available for review:

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

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

MITIGATION MONITORING AND REPORTING PROGRAM

The following mitigation measures must be implemented for this project in order to mitigate environmental impacts to a less than significant level. The responsible party must sign and date this form where provided when each measure is completed. A fully executed form fulfills the County's monitoring requirements under Public Resources Code Section 21081.6.

Mitigation Measures	Responsible Party	Timing of Compliance	Signature and Date of Compliance
Cultural Resources **CUL-1 MM**: Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A Cultural Resource Monitoring Plan shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.	Project Applicant, Project Contractor	Prior to obtaining building permits	
CUL-2 MM: If Human Remains Found If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5. 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	Project Applicant, Project Contractor	Within 30 days of the completion of ground disturbing activities on the project site	

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Mitigation Monitoring: **CUL MM-A**: In the event that previously unidentified cultural resources are discovered, the County Archaeologist shall review and approve the Research Design and Data Recovery Program. **CUL MM-B**: Monitoring: Monitoring shall be required if human remains are found pursuant to California Public Resources Code Section 5097.98	Project Applicant, Project Contractor	During ground disturbing activities		

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Geology and Soils **GEO-1 MM**: All earthwork including excavation, backfill and preparation of the primary foundation and/or slab bearing soil should be performed in accordance with the geotechnical recommendations presented in the Sladden report and potions of the local regulations or requirements as applicable. **Table 2 Summary of Recommendations** Remedial Grading Over-excavation & re-compaction within the building envelope and extending laterally 5 feet beyond the building limits and to a minimum of 4 feet below the existing grade or 4 feet below the bottom of the footings, whichever is deeper. Native/Import Engineered Fill Place in thin lifts not exceeding 6 inches in a loose condition, at near optimum moisture content and compact to a minimum of 90 percent relative compaction. Asphalt Concrete Sections Compact the top 12 inches to at least 95 percent compaction at near optimum moisture content. All earthwork should be performed under the observation and testing of a qualified soil engineer. This includes the following: • The Project is required by law to comply with the California Building Standards Code which addresses construction standards including those related to geologic and soil conditions. • As a standard condition of Project approval, the Project will be required to comply with the site-specific recommendations contained in the geotechnical investigation prepared for the Project site. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics.	Project Geologist Riverside County TLMA (Building and Safety Division)	Prior to the issuance of a grading permit	

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
GEO-2 MM. In addition to GEO- MM 1 (above), the project will be required to comply with standard grading conditions. Also, prior to placement of fill, existing undocumented fill, soil, colluviums, and loose fan deposits should be overexcavated to firm, moist, fan materials or un-weathered bedrock. Oversized material should be placed in conformance with the Uniform Building Code. Mitigation Monitoring: **GEO MM-A**: The design and construction of the Project will be in monitored by the Riverside County TLMA (Building and Safety Division). **GEOL MM B**: The grading and placement of fill during construction of the Project will be in monitored by the Riverside County TLMA (Building and Safety Division).	Project Geologist Riverside County TLMA (Building and Safety Division)	Prior to the issuance of a grading permit	

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
PALEO-1 MM: The project paleontologist retained shall review the approved development plan and grading plan and shall conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the project paleontologist in Paleontological Resource Impact Mitigation Program (PRIMP]. This PRIMP shall be submitted to the County Geologist for review and approval prior to issuance of a Grading Permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standard and Society of Vertebrate Paleontology standards, are as follows: 1. Description of the proposed site and planned grading operations. 2. Description of the level of monitoring required for all earth-moving activities in the project area. 3. Identification and qualifications of the qualified paleontological monitor to be employed for grading operations monitoring. 4. Identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for recovery of large specimens. 5. Direction for any fossil discoveries to be immediately reported to the property owner who in turn will immediately notify the County Geologist of the discovery. 6. Means and methods to be employed by the paleontological monitor to quickly salvage fossils as they are unearthed to avoid construction delays. 7. Sampling of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. 8. Procedures and protocol for collecting and processing of samples and specimens.				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
9. Fossil identification and curation procedures to be employed. 10. Identification of the permanent repository to receive any recovered fossil material. The County of Riverside must be consulted on the repository/museum to receive the fossil material and a written agreement between the property owner/developer and the repository must be in place prior to site grading. 11. All pertinent exhibits, maps and references. 12. Procedures for reporting of findings. 13. Identification and acknowledgement of the developer for the content of the PRIMP as well as acceptance of financial responsibility for monitoring, reporting and curation fees. All reports shall be signed by the project paleontologist and all other professionals responsible for the report's content (e.g., Professional Geologist), as appropriate. Two wet-signed original copies of the report(s) shall be submitted to the office of the County Geologist along with a copy of this condition and the grading plan for appropriate case processing and tracking. These documents should not be submitted to the project Planner, the Plan Check staff, the Land Use Counter or any other County office. In addition, the applicant shall submit proof of hiring (i.e. copy of executed contract, retainer agreement, etc.) a project paleontologist for the in-grading implementation of the PRIMP. Monitoring: **PALEO MM-A**: Monitoring, if necessary, will be in accordance with the approved PRIMP.				
Tribal Resources Mitigation: **TCR-1 MM** Tribal Cultural Resource Monitor(s) for this Project will be employed for any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission	Project Applicant, Project Contractor	Within 30 days of the completion of ground disturbing activities on the project site		

to the requesting Tribal Historic Preservation Office (if requested), and other consulting tribal preservation offices requesting same. Mitigation Monitoring: **TCR MM-A**: At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the Riverside County TLMA (Building and Safety Division). documenting monitoring activities conducted by the project Archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the consulting tribes and Eastern Information Center and interested tribes.				