



**Environmental Assessment/Initial Study
Winchester U-Stor-It Project
Riverside County, California**

Prepared for
County of Riverside Planning Department
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COUNTY OF RIVERSIDE

ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Environmental Assessment (CEQ / EA) Number: CEQ210218
Project Case Type (s) and Number(s): GPA210111; CZ2100121; CUP210126
Lead Agency Name: County of Riverside Planning Department
Address: 4080 Lemon Street 12th Floor, Riverside, CA 92501
Contact Person: Cynthia Burgos
Telephone Number: (951) 955-6836
Applicant's Name: John Ly, U-Stor-It
Applicant's Address: 501 West Broadway, Suite 2020, San Diego, CA 92101

I. PROJECT INFORMATION

Project Description: The Winchester Road U-Stor-It project (project) is located at 33890 Winchester Road on Accessor Parcel Number (APN) 472-110-038 in the unincorporated community of Winchester, which is in the Southwest Area Plan (SWAP) in the county of Riverside, California. The regional location of the project site is shown in Figure 1, the project location on a U.S. Geological Survey (USGS) Map is shown in Figure 2, and an aerial photograph of the project site is shown in Figure 3. The project would develop the 11.12-acre project site with seven one-story self-storage buildings totaling 113,915 square feet and 165 recreational vehicle (RV) storage spaces. Building A would be 6,400 square feet, Building B would be 9,600 square feet, Building C would be 14,190 square feet, Building D would be 23,870 square feet, Building E would be 24,470 square feet, Building F would be 9,640 square feet, and Building G would be 25,745 square feet and include a management office.

The project would include off-site improvements to Coventry Lane that would consist of paving a 24-foot-wide roadway with 4-foot graded shoulders to connect to Keller Road. Off-site improvements would also consist of updating the storm drain connection at the Coventry Lane and Keller Road intersection to include an intermediate catch basin to collect and manage stormwater runoff that would then discharge west out of a new headwall. Further, in accordance with California Department of Transportation (Caltrans) standards and requirements, the project would install an off-site barricade with reflective signage to close access to Elmhurst Lane and Coventry Lane from Winchester Road/State Route 79 (SR-79). Construction staging would take place on the project site. Figure 4 shows the project site plan.

Site Access and Parking

Access to the project site would be provided via one ingress/egress driveway and one egress only driveway along Coventry Lane. Internal driveways would be constructed to allow for vehicular access throughout. Pursuant to Section 17.188.030 in the County of Riverside's (County's) Municipal Code, the project would require two parking spaces per three employees. The project would exceed this requirement by providing five standard parking spaces. In addition, the project would provide one Americans with Disabilities Act accessible van space in compliance with California Building Code (CBC) Section 11B-208.2 and one electric vehicle space in compliance with Section 17.188.045 of the County's Municipal Code.

Water and Sewer

As stated in the Eastern Municipal Water District (EMWD) Will Serve Letter (Appendix A), EMWD would provide water services to the project site. The project would construct a septic system that would include a leach field located beneath the RV storage area on the northeastern portion of the project site.

Security and Operation

The project would include 36 security cameras, security keypads, and security gates located at each access point. In addition, the project would include a combination of concrete masonry unit block walls and wrought-iron fencing to both prevent unauthorized access and reduce noise originating from the project site. The project would include a maximum of three employees on-site. The leasing office would be open from 9:30 a.m. to 6:00 p.m., Monday through Friday, and from 9:30 a.m. to 5:00 p.m., Saturday and Sunday. Gates for customer access would be open from 6:00 a.m. to 6:00 p.m., Monday through Friday, and from 6:00 a.m. to 5:00 p.m. on Saturday and Sunday. To enter the facility, tenants would be required to utilize keypads in front of the entrance gate.

Grading

Project grading would consist of approximately 17,250 cubic yards of cut, 18,587 cubic yards of fill, resulting in a net import of 1,338 cubic yards. In addition, off-site grading would consist of approximately 3,425 cubic yards of cut and 1,425 cubic yards of fill, resulting in a net export of 2,000 cubic yards. In total, the project would consist of a net export of 662 cubic yards.

Landscaping

As shown in Figure 5, the proposed landscaping would include a mixture of trees, shrubs, vines, and groundcover for a total landscaped area of 3.19 acres or 28.69 percent of the total 11.12-acre project site. The project would also include a bioretention basin landscaped with shrubs and a mixture of trees on the southern corner of the project site. In compliance with State Government Code Section 51182, the project would incorporate fuel modification zones (FMZs) as shown in the Fire Protection Plan (Figure 6).

Drainage

As discussed in the Drainage Study (Appendix B), development of the project would increase impervious areas on the project site from zero percent to 53 percent. As shown in Figure 5, the project would construct a landscaped bioretention basin on the southeast corner of the project site which would retain the 100-year, 3-hour storm event with zero discharge. The only discharge from the on-site storm drain system would be via a pump vault that would be within the bioretention basin for hydromodification purposes.

Open Space Easement

The project includes a conservation easement to preserve the on-site drainage, restoration area and buffer.

Fire Protection Features

The project includes the following design features related to wildfire protection:

- Six on-site fire hydrants
- A 24-foot-wide internal access road with an approved paved surface to provide all-weather driving capabilities meeting the 80,000-pounds-per-square-inch requirement and an unobstructed vertical clearance of 13 feet 6 inches
- All new buildings and structures that are 3,600 square feet or greater would feature approved automatic sprinkler systems

- No buildings shall be constructed of wood; the proposed storage buildings shall be built with masonry construction and light-gauge steel with metal roofs
- Complete fencing surrounding the property shall be fire resistant, either masonry, concrete, or rod iron
- Landscape plans would comply with County requirements
- Three FMZs (see Figure 6): Immediate Zone: zero to 5 feet around the buildings, the Intermediate Zone 5 to 30 feet, and the Extended Zone 30 to 100 feet. All FMZs shall meet the standards of the Office of the State Fire Marshal's defensible space guidelines, as detailed in the project's Fire Protection Plan

Discretionary Approvals

The discretionary approvals required for the project include a General Plan Amendment (GPA; GPA210111), Change of Zone (CZ2100121), and Conditional Use Permit (CUP; CUP210126). The GPA (GPA210111) would amend the existing General Plan Land Use Designation from Rural Residential (RR) to Commercial Retail (CR). The Change of Zone would amend the existing Rural Residential (RR) Zone to the General Commercial (C-1/C-P) Zone. The CUP would be required to allow the mini-warehouse use within the General Commercial (C-1/C-P) Zone.

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

B. Total Project Area: 11.12 acres

Residential Acres: N/A

Commercial Acres: 11.12

Lots: 1

Units: N/A

Sq. Ft. of Bldg. Area: 113,915
square feet

Projected No. of Residents: N/A

Est. No. of Employees: 3

Industrial Acres: N/A

Other: N/A

C. Assessor's Parcel No(s): 472-110-038

Street References: Winchester Road/SR-79 and Elmhurst Lane

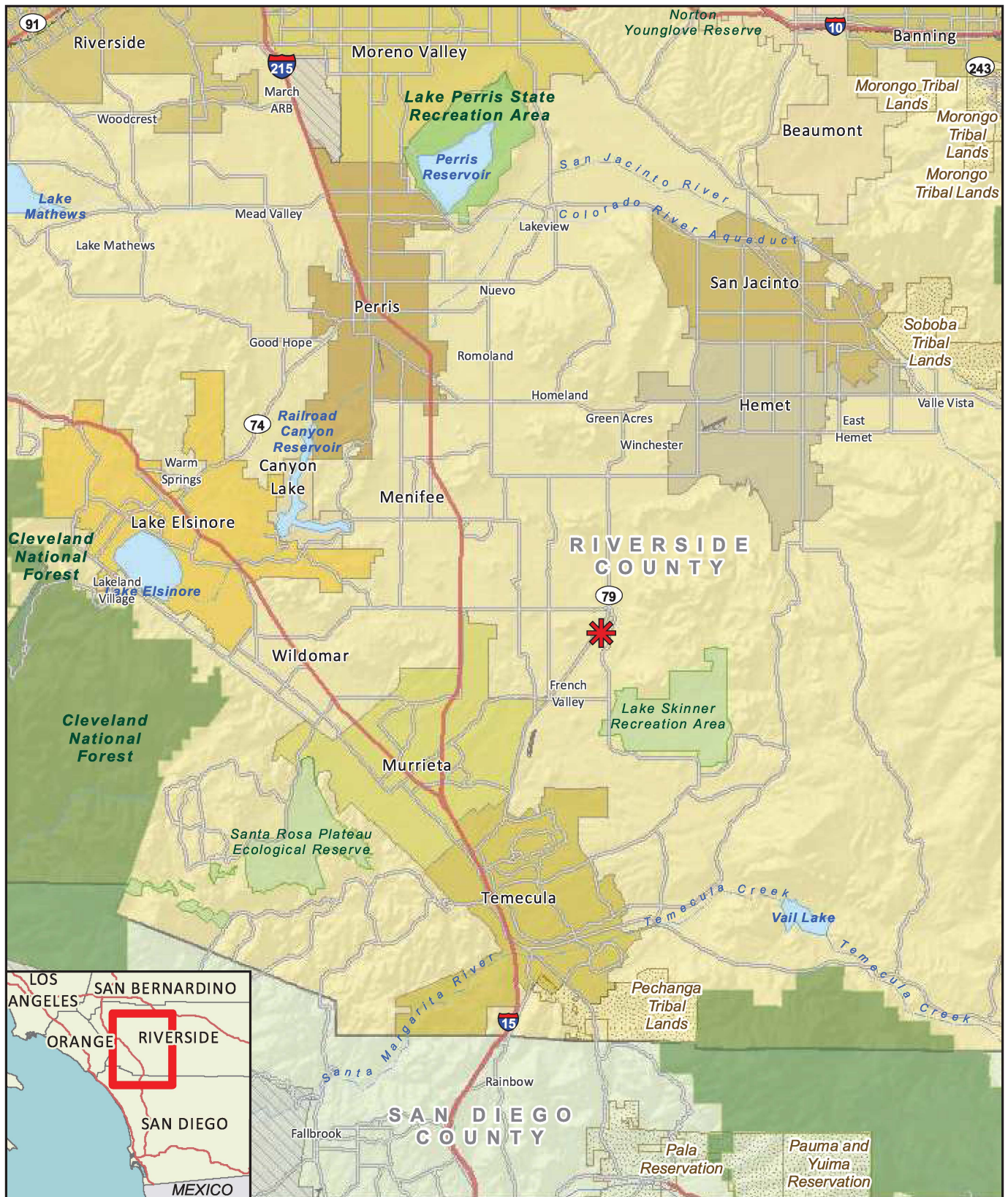
D. Section, Township & Range Description or reference/attach a Legal Description:

Section 21, Township 06 South, Range 02 West of the U.S. Geological Survey (USGS) 7.5-minute topographic map, Winchester quadrangle.

E. Brief description of the existing environmental setting of the project site and its surroundings: The project site is located at 33890 Winchester Road in the unincorporated community of Winchester, which is in the SWAP in the county of Riverside, California. It is situated immediately east of Winchester Road/SR-79 and is bordered by Elmhurst Lane and Coventry Lane Road to the north, U-Haul Neighborhood Dealer to the south, and vacant land to the east.

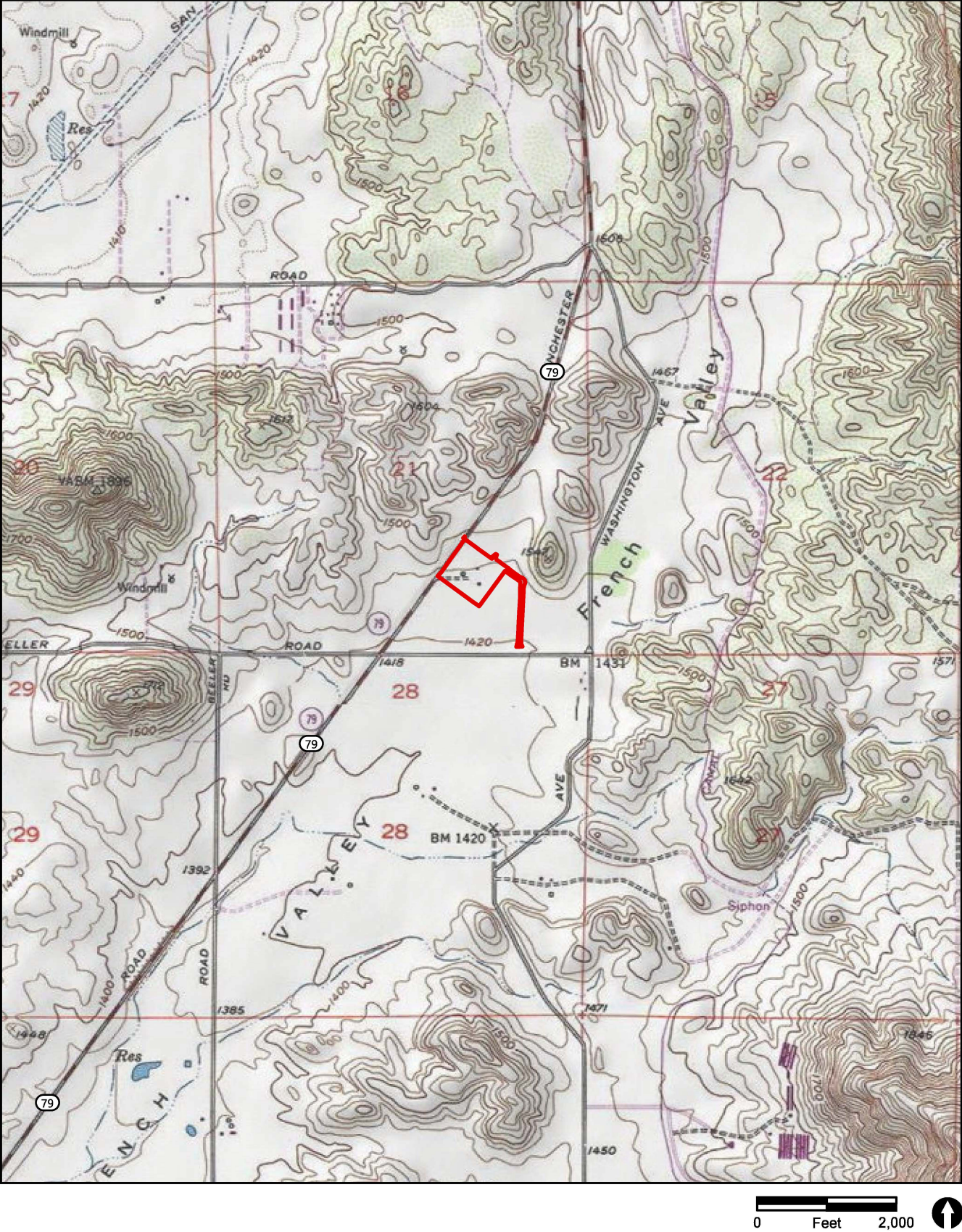
F. Other Public Agency Involvement and Required Permits:

- 401 Permit from the Riverside Water Quality Control Board (RWQCB)
- 1602 Streambed Alteration Agreement from the California Department of Fish and Wildlife (CDFW)



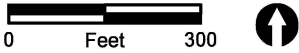
✱ Project Location

FIGURE 1
Regional Location



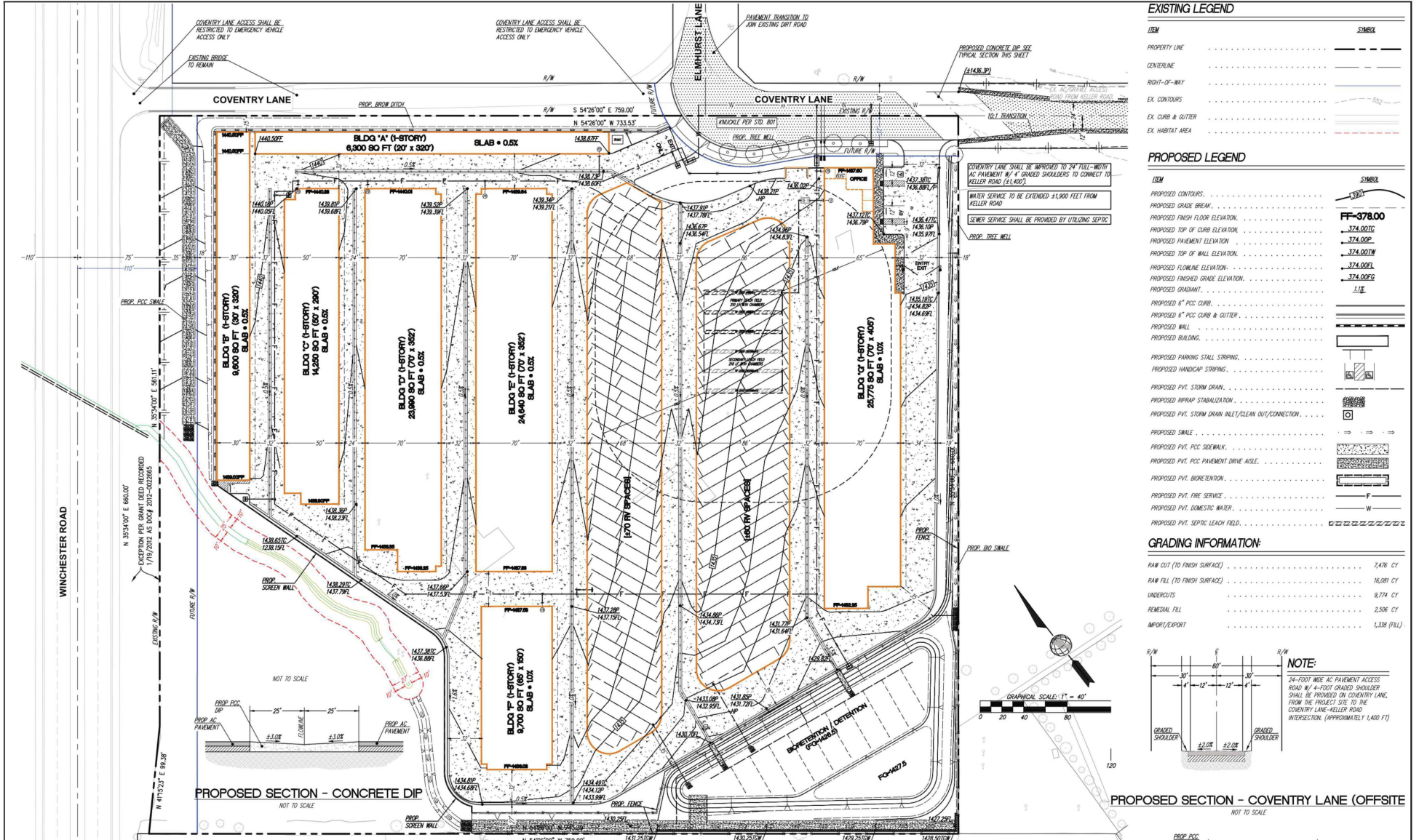
 Project Boundary

FIGURE 2
Project Location on USGS Map

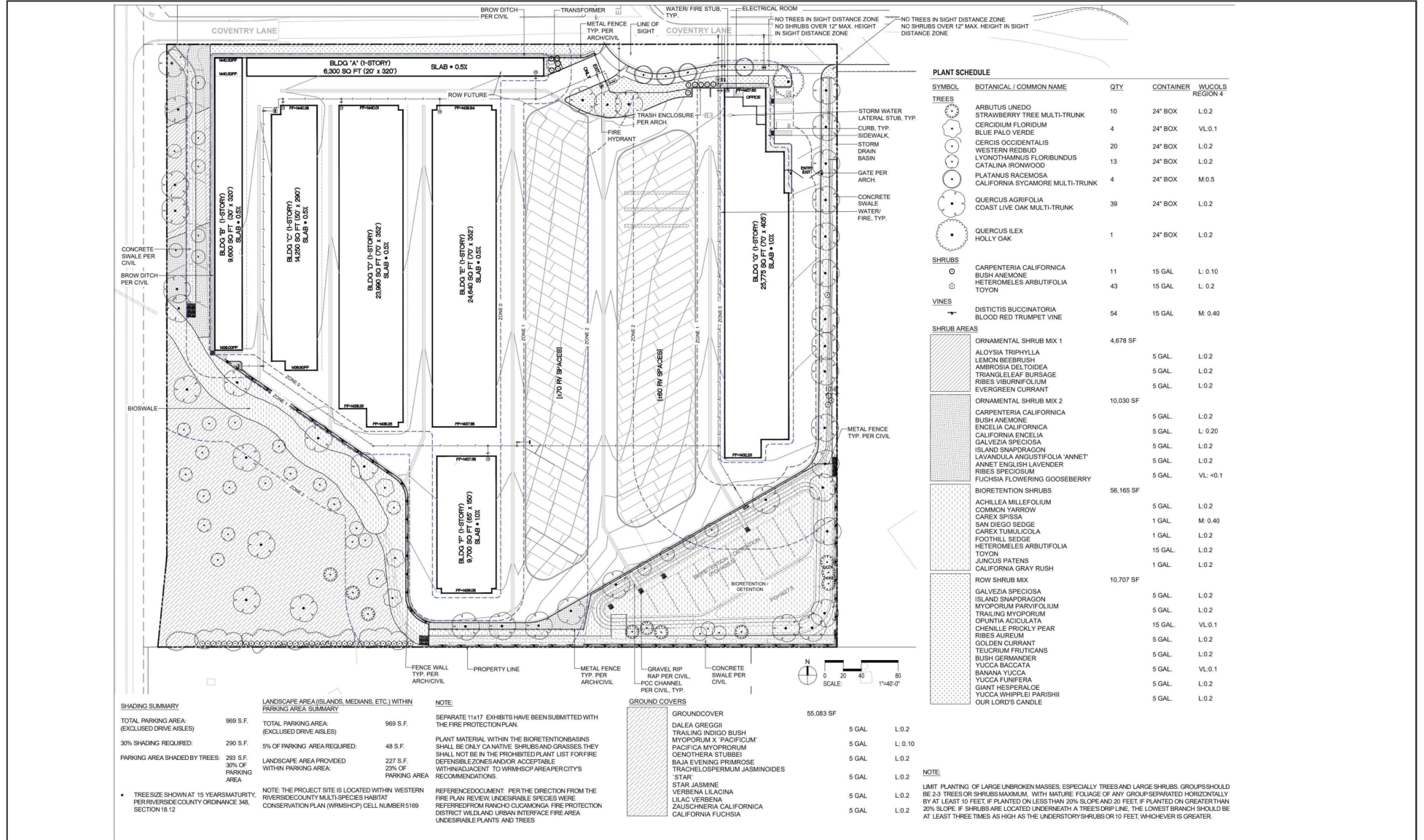


- Project Parcel
- Off-site Improvements
- Barricade Area

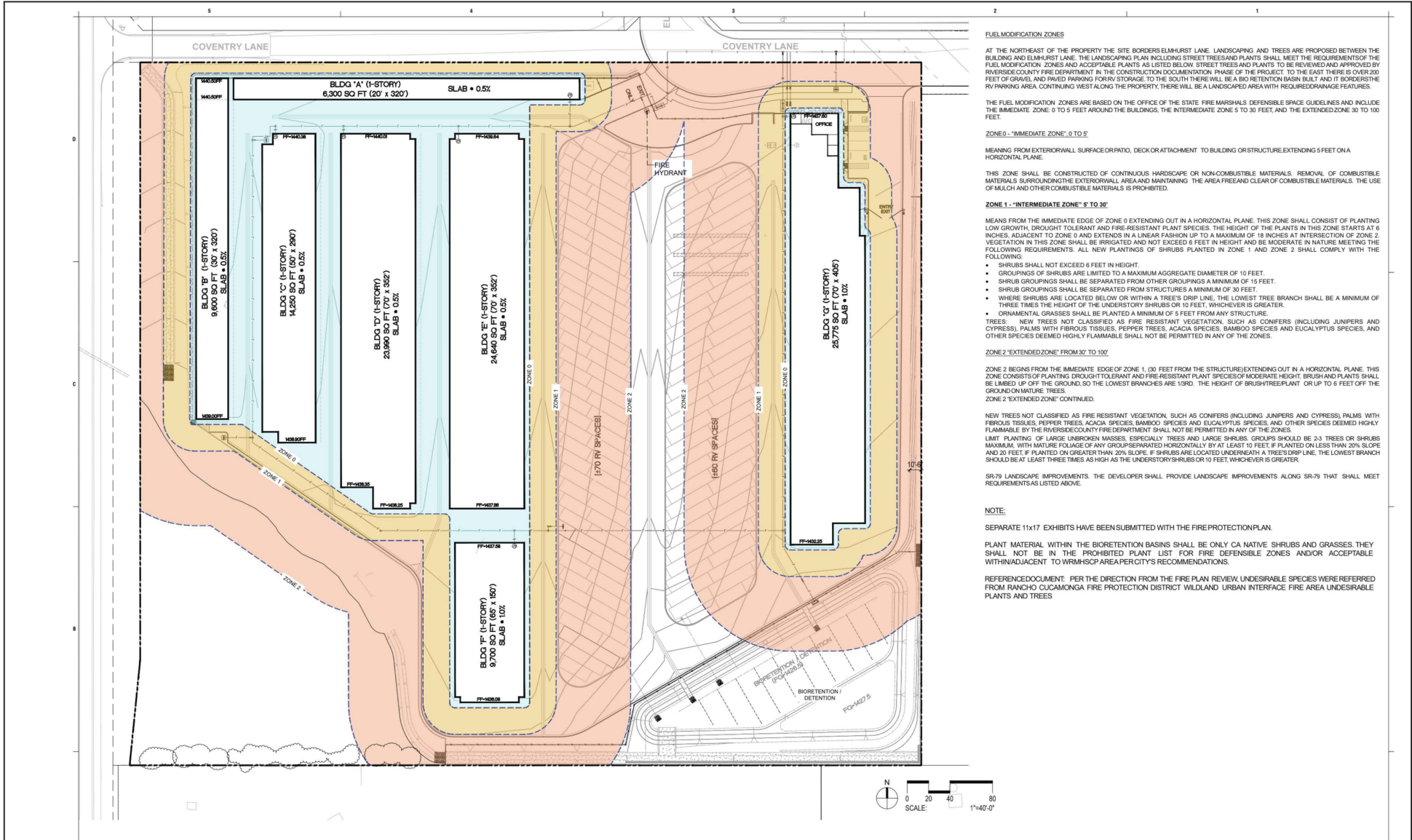
FIGURE 3
Project Location on Aerial Photograph



Map Source: McCullough



Map Source: McCullough



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FIGURE 6
Fire Protection Plan

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

1. **Land Use:** The project would consist of a GPA (GPA210111) to amend the existing General Plan Land Use Designation of Rural Residential (RR) to Commercial Retail (CR). The Commercial Retail (CR) land use allows for local and regional serving retail and service uses. Building intensity ranges from 0.20 to 0.35 floor area ratio.
2. **Circulation:** The project would result in a trip generation of approximately 190 daily two-way trips with 12 trips (7 inbound, 5 outbound) produced in the AM peak hour and 19 trips (9 inbound, 10 outbound) produced in the PM peak hour on a "typical" weekday.
3. **Multipurpose Open Space:** The project would consist of a general plan land use change from Rural Residential (RR) to Commercial Retail (CR). The project site has not been planned for natural open space. The project would not conflict with the Multipurpose Open Space Element.
4. **Safety:** The project is located within a high sensitivity paleontological area. The project is located within a high fire hazards area. The project site is not located within any other special hazard zone (including fault zone, dam inundation zone, etc.). The project would allow for sufficient provision of emergency response services through project design and payment of development impact fees. The project meets all other applicable Safety Element policies.
5. **Noise:** The project would not generate noise levels in excess of standards established in the County of Riverside General Plan (General Plan or noise ordinance. The project would meet all other applicable Noise Element Policies.
6. **Housing:** The project would develop and operate a self-storage and RV storage facility on an undeveloped site. The project site is currently designated as Rural Residential (RR); however, the project site does not currently contain housing. The project would not conflict with any Housing Element policies.
7. **Air Quality:** The project would follow South Coast Air Quality Management District (SCAQMD) policies to control any fugitive dust during grading and construction activities and would not exceed air quality emissions thresholds during either construction or operation of the project. The project meets all other applicable Air Quality Element policies.
8. **Healthy Communities:** The project would not result in any air quality, hazardous materials, noise, or other impacts that would affect Healthy Communities. Thus, the project would not result in conflicts with the Healthy Communities policies.
9. **Environmental Justice Summary:** The project site is not in an Environmental Justice Community. The project would develop and operate a self-storage and RV storage facility. The project would not conflict with any issues related to environmental justice.

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

C. Foundation Component(s): Rural

D. Land Use Designation(s): Rural Residential (RR)

E. Proposed Land Use Designation(s): Commercial Retail (CR)

F. Overlay(s), if any: Community Development Overlay (CDO)

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

H. Adjacent and Surrounding:

1. General Plan Area Plan(s): Southwest Area Plan (SWAP)

2. Foundation Component(s): Community Development and Open Space to the west and Rural to the north, east, and south.

3. Land Use Designation(s): Commercial Retail (CR) to the west, Open-Space Conservation (OS-C) to the northwest and Rural Residential (RR) to the north, east, and south.

4. Overlay(s), if any: Community Development Overlay (CDO)

5. Policy Area(s), if any: SR-79

I. Adopted Specific Plan Information

1. Name and Number of Specific Plan, if any: N/A

2. Specific Plan Planning Area, and Policies, if any: N/A

J. Existing Zoning: Rural Residential (R-R-2 ½)

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

L. Adjacent and Surrounding Zoning: Specific Plan (SP Zone) to the west, Light Agriculture with a minimum parcel size of 10 acres (A-1-10) to the north and east, and Light Agriculture with a minimum parcel size of 5 acres (A-1-5) to the south.

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

IV. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED

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

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

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

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED

☐ I find that although the proposed project could have a significant effect on the environment, **NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED** because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.

☐ I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An **ADDENDUM** to a previously-certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.

☐ I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.

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

Cynthia Burgos

Signature

04/27/2026

Date

Cynthia Burgos

Printed Name

For: John Hildebrand
Planning Director

V. ENVIRONMENTAL ISSUES ASSESSMENT

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

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

Source(s): Riverside County General Plan Circulation Element Figure C-8 “Scenic Highways” (County of Riverside 2020a); Google Earth Pro (Google Earth Pro 2025); County of Riverside Southwest Area Plan (County of Riverside 2021a); Western Riverside County Multiple Species Habitat Conservation and Consistency Analysis and Biology Report prepared by LSA (Appendix C)

Findings of Fact:

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

Less than Significant Impact. The California Scenic Highway Program (Senate Bill [SB] 1467) was established to identify portions of State highways with scenic corridors, and to assign the State the responsibility to protect those scenic corridors. Scenic Corridors consist of land that is visible from, adjacent to, and outside the highway right-of-way, and primarily comprise scenic and natural features (SB 1467). The County has officially recognized several roadways as either State or County designated, or eligible scenic highways.

As shown on General Plan Figure C-8, the project site is not located within or near a scenic highway. The closest officially Designated State Scenic Highway is the “Idyllwild National Forest Highway,” a portion of the State Route 74 (SR-74) and is located approximately 22.5 miles northeast of the project

site. The closest Eligible County Scenic Highway is Interstate 215 located approximately 5.6 miles east of the project site, and the closest Eligible State Scenic Highway is SR-74, located approximately 7.8 miles north of the project site. Therefore, the project would not have a substantial effect upon a scenic highway corridor within which it is located, and impacts would be less than significant.

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

Less than Significant Impact. The project site is currently vacant and is situated immediately east of SR-79/Winchester Road and is bordered by Elmhurst Lane and Coventry Lane Road to the north, U-Haul Neighborhood Dealer to the south, and vacant land to the east. The General Plan describes that in addition to scenic corridors, scenic resources include natural landmarks and prominent or unusual features of the landscape; however, the General Plan does not designate specific scenic resources. As described in Section 4.5.a below, no historic buildings are currently located on the project site. As described in the Western Riverside County Multiple Species Habitat Conservation and Consistency Analysis and Biology Report (Appendix C), there are no native mature trees or rock outcroppings on the project site. Views of the surrounding foothills are available from public vantage points on Winchester Road, Elmhurst Lane, and Coventry Lane.

The project would have a maximum height of 13 feet and 5 inches, which is consistent with the GC Zone. The project would be set back from the adjacent streets, landscaped with a mixture of trees, shrubs, and groundcover, and would not encroach on any existing public views. Long-range views of the surrounding foothills would continue to be available from public vantage points on surrounding streets. Therefore, the project would not substantially damage scenic resources, obstruct any prominent scenic vista or view open to the public, or result in the creation of an aesthetically offensive site. As such, impacts regarding scenic resources would be less than significant.

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

Less than Significant Impact. The project is in a non-urbanized area and would be assessed under this threshold based on its potential to degrade the existing visual character or quality of public views of the project site. The project would be required to adhere to regulatory standards applicable to the development of the project site, to ensure the preservation of visual character and quality through architecture, landscaping, and site planning. The provisions of County Ordinance No. 348 are intended to minimize adverse aesthetic impacts associated with new development projects and are relevant to the proposed project. Table 1 summarizes relevant development standards and the project's consistency with each standard.

Table 1: Development Standard Consistency

County Development Standard		Project Consistency
Minimum Lot Size	Not Applicable	484,620 square feet
Maximum Building Height	50 feet	15 feet and 9 inches
Minimum Landscape Area	Not Applicable	1 square feet
Maximum Floor Area Ratio	0.35	0.23
Minimum Street Setback	Not Applicable for buildings under 35 feet tall	Not Applicable for buildings under 35 feet tall
Parking	2 spaces/3 employees	5 spaces/3 employees (5 standard, 1 accessible, and 1 electric vehicle)

The project would construct seven self-storage buildings totaling 113,915 square feet and RV storage (165 spaces). The seven proposed buildings would result in a floor area ratio of 0.23 on the 11.12-acre project site and the maximum building height would be 15 feet and 9 inches. The project site is bounded by the U-Haul Neighborhood Dealer to the south. Since the project would be bounded by a similar use and a maximum of 15 feet and 9 inches tall, it would be consistent with County development standards to minimize its encroachment into public long-distance views.

Landscaping areas would be located within the setback space between the adjoining parcels, SR-79/Winchester Road and Elmhurst Lane and Coventry Lane Road, which would minimize the visual scale of the structures (see Figure 5). Additionally, 94 ornamental trees would be placed intermittently among the proposed landscaping at the project site boundaries. The layering of landscaping between the proposed buildings and the surrounding roadways would provide visual depth and distance between the roadways and proposed structures, while functioning as a screen to the proposed self-storage buildings and RV storage parking lot.

Therefore, while the project would change the visual character of the site, it would not substantially degrade the existing visual character or quality of public views of the site and its surroundings and impacts 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
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): Google Earth Pro (Google Earth Pro 2025); County of Riverside Southwest Area Plan (County of Riverside 2021); County of Riverside Ordinance Number 655 (County of Riverside 1988)

Findings of Fact:

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

Less than Significant Impact. Mt. Palomar Observatory is located approximately 50.7 miles southeast of the project site. County Ordinance No. 655 (Lighting Plans) was established to control the effects of skyglow and to reduce the impact of development upon the Mt. Palomar Observatory. Two zones were established by the County to identify the proximity of a project to the observatory and to establish lighting restrictions for projects that take place within each zone. Projects within Zone A are those projects within a 15-mile radius of Palomar Observatory. Projects within Zone B are within a 45-mile radius of Palomar Observatory, and/or within a 30-mile radius of the outer perimeter of Zone A. Review of the County's SWAP, Figure 6 "Southwest Area Plan Mt. Palomar Nighttime Lighting Policy Area" determined that the project site is within Zone B.

Projects within Zone B are required to meet specific lighting design standards to minimize light that could have a detrimental effect on astronomical observation and research. To ensure that lighting meets the required standards, the project would be required to submit lighting plans for approval as part of the permitting process. Through the County's development review process and conditions of approval, the project would be required to comply with County Ordinance No. 655. Thus, potential project interference with nighttime use of the Mt. Palomar Observatory would also 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
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): County of Riverside Ordinance Number No. 915 (County of Riverside 2012)

Findings of Fact:

a) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact. The project would construct seven self-storage buildings totaling 113,915 square feet and RV storage (165 spaces). Development of the project could introduce new sources of light and glare into the area from street lighting, parking lot lighting, and other outdoor lighting including security and site lighting. The project would be required to adhere to County No. Ordinance 915 (Outdoor Lighting), which was established to provide minimum requirements for outdoor lighting in order to reduce light trespass. Implementation of County Ordinance No. 915 (Outdoor Lighting) would occur during the County's permitting process, to ensure the project's consistency with allowable placement and luminary standards.

The proposed building materials would not include highly reflective materials; outdoor lights would be shielded consistent with County Ordinance No. 915 requirements; and the proposed landscaping along project boundaries would screen sources of light and reduce the potential for glare. Additionally, the project would not adversely affect day or nighttime views in the area given the similarity of the existing lighting in the surrounding environment. Thus, through ordinance compliance and design standards, the project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and light and glare impacts would be less than significant.

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

Less than Significant Impact. The closest residential property is located 95 feet south of the project site and 290 feet from the off-site improvement area. The project would adhere to all applicable County lighting regulations, including County Ordinance Nos. 655 and 915 requiring the submittal of lighting plans for approval as part of the permitting process. This process would ensure that residential property and other light sensitive uses would not be exposed to unacceptable levels of light, and impacts related to levels of light 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
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 nonagricultural 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 nonagricultural 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 nonagricultural use?	☐	☐	☐	☒

Source(s): California Important Farmland Finder (California Department of Conservation 2022a); California Williamson Act Enrollment Finder (California Department of Conservation 2022b); Google Earth Pro (Google Earth Pro 2025); Historic Aerials (Nationwide Environmental Title Research, LLC 2025)

Findings of Fact:

- a) **Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?**

Less than Significant Impact. According to the California Important Farmland Finder (California Department of Conservation 2022a), the project site is designated farmland of local importance. The project site was previously associated with a single-family agricultural residence. A review of Google Earth Pro and historic aerial imagery shows a farm/ranch operation with outbuildings and livestock fencing present in 1938, 1967, and 1978. Based on review of available historical imagery, the buildings, and other structures on-site were demolished circa 2003. The project would consist of a general plan land use change from Rural Residential (RR) to Commercial Retail (CR) and a zone change from Rural Residential (R-R-2 ½) to General Commercial (C-1/C-P). The project site is currently vacant, and no agricultural activities occur on-site. Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use. Impacts would be less than significant.

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

No Impact. According to the California Williamson Act Enrollment Finder (California Department of Conservation 2022b), the project site is not subject to a Williamson Act contract. The project would consist of a general plan land use change from Rural Residential (RR) to Commercial Retail (CR) and a zone change from Rural Residential (R-R-2 ½) to General Commercial (C-1/C-P). The project site is vacant and undeveloped; and no agricultural activities currently occur on-site. Therefore, a conflict with an agricultural zone or use would not occur. In addition, the project site is not subject to a Williamson Act contract and is not land within a County Agricultural Preserve. As a result, the project would not conflict with agricultural zoning, agricultural use, a Williamson Act contract, or a County Agricultural Preserve. No impact would occur.

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

Less than Significant Impact. The properties north and east of the project site are zoned Light Agriculture with a minimum parcel size of 10 acres (A-1-10) and the property south of the project site is zoned Light Agriculture with a minimum parcel size of 5 acres (A-1-5). Therefore, the project would result in the development of nonagricultural uses within 300 feet of agriculturally zoned property pursuant to Riverside County Ordinance No. 625 Right-to-Farm Ordinance. However, Ordinance No. 625 requires disclosure to prospective property owners and occupants regarding the potential for agricultural operations in the vicinity. Compliance with this ordinance would reduce potential conflicts between agricultural and nonagricultural uses; therefore, impacts would be less than significant.

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

Less than Significant Impact. The properties north and east of the project site are zoned Light Agriculture with a minimum parcel size of 10 acres (A-1-10) and the property south of the project site is zoned Light Agriculture with a minimum parcel size of 5 acres (A-1-5). As discussed above, the project site is mapped as farmland of local importance in the California Important Farmland Finder. Historical aerial imagery reviewed in Google Earth Pro indicates the site was previously associated with a farm or ranch operation, with outbuildings and livestock fencing visible in imagery from 1938, 1967, and

1978. Based on review of available historical imagery, the buildings and other structures on-site were demolished circa 2003.

The project would include a General Plan land use designation change from Rural Residential (RR) to Commercial Retail (CR) and a zone change from Rural Residential (R-R-2½) to General Commercial (C-1/C-P). The project site is currently vacant and is not in agricultural production. Therefore, development of the project would not result in the conversion of actively farmed land to nonagricultural use. Impacts 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
5. Forest	☐	☐	☐	☒
a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?	☐	☐	☐	☒
b) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	☐	☐	☐	☒

Source(s): Riverside County General Plan Figure OS-3a “Forestry Resources Western Riverside County Parks, Forests, and Recreation Areas” and Figure OS-3b “Forestry Resources Eastern Riverside County Parks, Forests, and Recreation Areas”; (County of Riverside 2015a); County of Riverside Map My County v11.9 Report for APN 472-110-038 (County of Riverside 2024a)

Findings of Fact:

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))?

No Impact. There are no forest lands or forest resources on or in proximity to the project site. Additionally, the project site is not designated or zoned for forest or timberland or used for timberland production. As such, development of the project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g)). No impact would occur.

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

No Impact. There is no forest land in the vicinity of the project site. Therefore, development of the project would not cause loss of forest land or convert forest land to non-forest use. No impact would occur.

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?

No Impact. There is no existing forest land or timberland on the project site or within the project vicinity, and the project would not involve other changes that could result in the conversion of forest land to non-forest uses. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AIR QUALITY Would the project:				
6. Air Quality Impacts				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Source(s): Air Quality Analysis prepared by RECON Environmental, Inc. (Appendix D); Bay Area Air Quality Management District 2017 Clean Air Plan; Office of Environmental Health 2015 Hazard Assessment (Office of Environmental Health Hazard Assessment 2015), Traffic Volumes: Annual Average Daily Traffic for All Vehicles on California State Highways (Caltrans 2021), SCAQMD CEQA Air Quality Handbook (SCAQMD 1993); SCAQMD Air Quality Significance Thresholds (SCAQMD 2015)

Findings of Fact:

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. The Southern California Air Basin (SoCAB) is designated as in attainment or unclassifiable attainment (expected to be meeting the standard despite a lack of monitoring data) for all federal air quality standards except for the 8-hour ozone and fine particulate matter (PM_{2.5}) standards. The SoCAB is also designated as in nonattainment for state air quality standards for 8-hour ozone and PM_{2.5}, and additionally is in nonattainment of state PM₁₀ standards. The regional 2022 Air Quality Management Plan (AQMP), outlines measures to reduce emissions of ozone and PM_{2.5}. Whereas reducing PM concentrations is achieved by reducing emissions of PM_{2.5} to the atmosphere, reducing ozone concentrations is achieved by reducing the precursors of photochemical formation of ozone, volatile organic compounds (VOC), and oxides of nitrogen (NO_x).

The growth forecast for the 2022 AQMP is based in part on the land uses established by local general plans. Thus, if a project is consistent with land use as designated in the local general plan, it can normally be considered consistent with the 2022 AQMP. Projects that propose a different land use than

is identified in the local general plan may also be considered consistent with the 2022 AQMP if the proposed land use is less intensive than buildout under the current designation. For projects that propose a land use that is more intensive than the current designation, analysis that is more detailed is required to assess conformance with the 2022 AQMP.

The project site is designated as Rural Residential (RR) in the County's General Plan and is zoned Rural Residential (R-R-2 ½). The project would require a land use change from Rural Residential (RR) to Commercial Retail (CR) and a zone change from Rural Residential (R-R-2 ½) to General Commercial (C-1/C-P). However, the project would not be of a greater intensity than under current designations because it does not propose a residential use that would attract new residents and would require minimal employees. The project would therefore be consistent with the growth forecasting assumed in the 2022 AQMP.

Another factor used to determine if a project would conflict with implementation of the 2022 AQMP is determining if the project would 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 (national ambient air quality standards [NAAQS] and California ambient air quality standards [CAAQS]) or interim emissions reductions specified in the 2022 AQMP. NAAQS and CAAQS violations could occur if project emissions exceed regional significance thresholds or localized significance thresholds (LSTs). As shown in Tables 2 and 3, construction and operational emissions would not exceed the regional significance thresholds. Additionally, as shown in Tables 4 and 5, construction and operational emissions would not exceed the SCAQMD LSTs.

Table 2: Maximum Daily Construction Emissions

Year	Emissions (pounds per day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2026	3	29	30	<1	9	5
2027	55	10	16	<1	1	1
Maximum Daily Emissions	55	29	30	<1	9	5
<i>SCAQMD Significance Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
<i>Exceeds Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
ROG = reactive organic gases; NO _x = oxides of nitrogen; CO = carbon monoxide; SO ₂ = sulfur dioxide; PM ₁₀ = coarse particulate matter; PM _{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District NOTE: Emissions were rounded to the nearest whole number. Emissions reported as <1 indicate that emissions were calculated to be less than 0.5 pound per day.						

Table 3: Summary of Project Operational Emissions (pounds per day)

Source	Emissions					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile Sources	1	1	6	<1	1	<1
Area Sources	4	<1	5	<1	<1	<1
Energy Sources	<1	1	<1	<1	<1	<1
Total	4	1	12	<1	2	<1
<i>SCAQMD Significance Threshold</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
<i>Exceeds Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
ROG = reactive organic gases; NO _x = oxides of nitrogen; CO = carbon monoxide; SO _x = oxides of sulfur; PM ₁₀ = coarse particulate matter; PM _{2.5} = fine particulate matter NOTE: Totals may vary due to independent rounding.						

Table 4: Localized Construction Emissions

	NO_x	CO	PM₁₀	PM_{2.5}
Site Preparation (3.5 acres per day)				
Maximum On-Site Daily Emission	29.16	28.81	8.91	5.08
<i>LST Threshold</i>	216.77	1,221.40	9.83	6.06
Exceeds Threshold?	No	No	No	No
Grading (4.5 acres per day)				
Maximum On-Site Daily Emission	27.23	27.57	4.71	2.46
<i>LST Threshold</i>	253.69	1,462.29	12.02	7.33
Exceeds Threshold?	No	No	No	No
NO _x = oxides of nitrogen; CO = carbon monoxide; PM ₁₀ = coarse particulate matter; PM _{2.5} = fine particulate matter; LST = localized significance thresholds				

Table 5: Localized Operations Emission

Operations	Pollutant (pounds per day)			
	NO_x	CO	PM₁₀	PM_{2.5}
Area Sources	0.04	4.95	0.01	0.01
Energy Sources	0.58	0.49	0.04	0.04
Maximum On-Site Emissions	0.62	5.44	0.05	0.05
<i>Operations LST Threshold¹</i>	118	602	1	1
Exceeds Threshold?	No	No	No	No
NO _x = oxides of nitrogen; CO = carbon monoxide; PM ₁₀ = coarse particulate matter; PM _{2.5} = fine particulate matter; LST = localized significance thresholds				
NOTE: Totals may vary due to independent rounding.				
¹ Emissions are assessed against the threshold for 1-acre project sites with sensitive receptors within 25 meters of the project site boundary.				

Therefore, the project would not conflict with or obstruct the implementation of any applicable air quality plan, including the 2022 AQMP or relevant portions of the State Implementation Plan, and impacts would be less than significant.

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

Less than Significant Impact. As discussed above, the SoCAB is classified as in attainment for all criterion pollutants except for ozone, coarse particulate matter (PM₁₀), and PM_{2.5}. The SoCAB is designated as a nonattainment area for NAAQS for the 8-hour ozone and PM_{2.5} standards, and is in nonattainment area under state PM₁₀ standards. Ozone is not emitted directly but is a result of atmospheric activity on precursors. NO_x and reactive organic gases (ROG) are known as the chief “precursors” of ozone. These compounds react in the presence of sunlight to produce ozone.

Based on SCAQMD cumulative significance methodologies, the emissions-based thresholds are used to determine if a project’s contribution to regional cumulative emissions is cumulatively considerable. These thresholds were used to assess the significance of the project-specific and cumulative air quality impacts. Air quality impacts are basin-wide, and air quality is affected by all pollutant sources in the SoCAB. As the individual project thresholds are designed to help achieve attainment with cumulative basin-wide standards, they are also appropriate for assessing the project’s contribution to cumulative impacts.

As shown in Tables 2 and 3 above, emissions of ozone precursors (ROG and NO_x), PM₁₀, and PM_{2.5} during construction and operation of the project would not exceed the SCAQMD's thresholds of significance. These thresholds are designed to provide limits below which project emissions from an individual project would not significantly affect regional air quality or the timely attainment of the NAAQS and CAAQS. Therefore, the project would not result in a cumulatively considerable net increase in emissions of ozone, PM₁₀, or PM_{2.5}, and impacts would be less than significant.

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

Less than Significant Impact. A sensitive receptor is a person in the population who is more susceptible to health effects due to exposure to an air contaminant than is the population at large. Examples of sensitive receptor locations in the community include residences, schools, playgrounds, childcare centers, churches, athletic facilities, retirement homes, and long-term health care facilities. Rural residential uses are located in the vicinity of the project site. The closest residential structure is located 95 feet south of the project site and 290 feet from the off-site improvement area.

The two primary emissions of concern regarding health effects for land development projects are diesel particulate matter (DPM) and carbon monoxide (CO). Projects that would site sensitive receptors near potential CO hotspots or would contribute vehicle traffic to local intersections where a CO hotspot could occur would be considered as having a potentially significant impact.

Diesel Particulate Matter – Construction

Projects that would result in exposure to toxic air contaminants (TACs) resulting in a maximum incremental cancer risk greater than one in one million without application of best available control technology for toxics or a threshold of 10 in one million for projects implementing best available control technology for air toxics or a health hazard index greater than one would be considered as having a potentially significant impact. Construction of the project would result in the generation of DPM emissions from the use of off-road diesel construction activities and on-road diesel equipment used to bring materials to and from the project site. Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the project would occur over a 15-month period. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (Office of Environmental Health Hazard Assessment 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptor were 18 months, the exposure would be five percent (18 months divided by 30 years) of the total exposure period used for health risk calculation. Further, the project would implement construction best management practices and would be conducted in accordance with California Air Resources Board (CARB) regulations. Specifically, the project would implement the following Best Available Control Technology for Toxics measures during construction:

- The construction fleet shall use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or utilize CARB/U.S. Environmental Protection Agency

(U.S. EPA) Engine Certification Tier 3 or better, or other equivalent methods approved by the CARB.

- The engine size of construction equipment shall be the minimum size suitable for the required job.
- Construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications.
- Per CARB's Airborne Toxic Control Measures 13 (California Code of Regulations Chapter 10 Section 2485), the applicant shall not allow idling time to exceed five minutes unless more time is required per engine manufacturers' specifications or for safety reasons.

Due to the limited time of exposure and implementation of Best Available Control Technology for Toxics measures, project construction is not anticipated to create conditions where the probability is greater than 10 in one million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of noncarcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual. Additionally, with ongoing implementation of U.S. EPA and California Air Resources Board (CARB) requirements for cleaner fuels, off-road diesel engine retrofits, and new low-emission diesel engine types, the DPM emissions of individual equipment would be substantially reduced. Thus, DPM generated during construction would not result in the exposure of sensitive receptors to substantial pollutant concentration, and impacts would be less than significant.

Diesel Particulate Matter – Freeway

As discussed in the Air Quality Analysis (Appendix D), the CARB handbook indicates that siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles per day should be avoided when possible. The project does not include a sensitive land use and is located more than 500 feet from any roadway that carries 100,000 or more vehicles per day. Based on Caltrans traffic counts, the daily traffic volume on SR-79 in the vicinity of the project site is 26,000 average daily trips (Caltrans 2021). Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations associated with DPM during operation, and impacts would be less than significant.

Carbon Monoxide Hot Spots

A CO hot spot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near congested intersections where idling and queuing occur. Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins are attainment or maintenance areas for CO. Therefore, more recent screening procedures based on more current methodologies have been developed. The Sacramento Metropolitan Air Quality Management District developed a screening threshold in 2011, which states that any project involving an intersection experiencing 31,600 vehicles per hour or more will require detailed analysis. In addition, the Bay Area Air Quality Management District developed a screening threshold in 2010 which states that any project involving an intersection experiencing 44,000 vehicles per hour would require detailed analysis. This analysis conservatively assesses potential CO hot spots using the Sacramento Metropolitan Air Quality Management District screening threshold of 31,600 vehicles per hour.

The project would generate 183 daily trips, with 12 trips (7 inbound, 5 outbound) produced in the AM peak hour and 18 trips (9 inbound, 9 outbound) produced in the PM peak hour on a "typical" weekday. The daily traffic volume on SR-79 is 26,000 and volumes on other area roadways that intersect with SR-79 near the project site would be less than this. Peak hour volumes are typically 10 percent of the average daily traffic. Based on this, the hourly turning volumes at nearby intersections are projected to be well less than 31,600 vehicles per hour. Therefore, the project would not expose sensitive

receptors to substantial pollutant concentrations associated with a CO hot spot, and impacts would be less than significant.

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

Less than Significant Impact. The potential for an odor impact is dependent on a number of variables, including the nature of the odor source, distance between the receptor and odor source, and local meteorological conditions. During construction, construction equipment may generate some nuisance odors. The closest sensitive receptor to the project site is a residential structure located 95 feet south of the project site and 290 feet from the off-site improvement area. Exposure to odors associated with project construction would be short term and temporary in nature. Further, per CARB's Airborne Toxic Control Measures 13 (California Code of Regulations Chapter 10 Section 2485), the applicant shall not allow idling time to exceed five minutes unless more time is required per engine manufacturers' specifications or for safety reasons. Therefore, project construction would not generate odors adversely affecting a substantial number of people, and impacts would be less than significant.

The following list provides some common types of facilities that are known producers of objectionable odors. (Bay Area Air Quality Management District 2017). This list of facilities is not meant to be all-inclusive.

- Wastewater Treatment Plant
- Wastewater Pumping Facilities
- Sanitary Landfill
- Transfer Station
- Composting Facility
- Petroleum Refinery
- Asphalt Batch Plant
- Chemical Manufacturing
- Fiberglass Manufacturing
- Painting/Coating Operations
- Rendering Plant
- Coffee Roaster
- Food Processing Facility
- Confined Animal Facility/Feed Lot/Dairy
- Green Waste and Recycling Operations
- Metal Smelting Plants

The project does not include any of these uses that are typically associated with odor complaints. The project does not propose any uses or activities that would result in potentially significant operational-source odor impacts. Additionally, the project would be required to comply with SCAQMD Rule 402 which acts to prevent occurrences of odor nuisances. Therefore, project operation would not generate odors adversely affecting a substantial number of people, and impacts 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
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): Western Riverside County Multiple Species Habitat Conservation and Consistency Analysis and Biology Report prepared by LSA (Appendix C); Supplemental Western Riverside County Multiple Species Habitat Conservation and Consistency Analysis and Biology Report (Appendix E); Determination of Biologically Equivalent or Superior Preservation Report (Appendix F)

Findings of Fact:

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

Less than Significant with Mitigation Incorporated. The Western Riverside County Multiple Species Habitat Conservation and Consistency Analysis and Biology Report (Appendix C) analyzes the project site and the Supplemental Western Riverside County Multiple Species Habitat Conservation and Consistency Analysis and Biology Report (Appendix E) analyzes the off-site improvements. As determined in both reports, the project site and off-site improvement areas are located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP). Because the project site is within the SKR HCP, a fee associated with the SKR HCP will be required. The project site is not subject to any other adopted HCP.

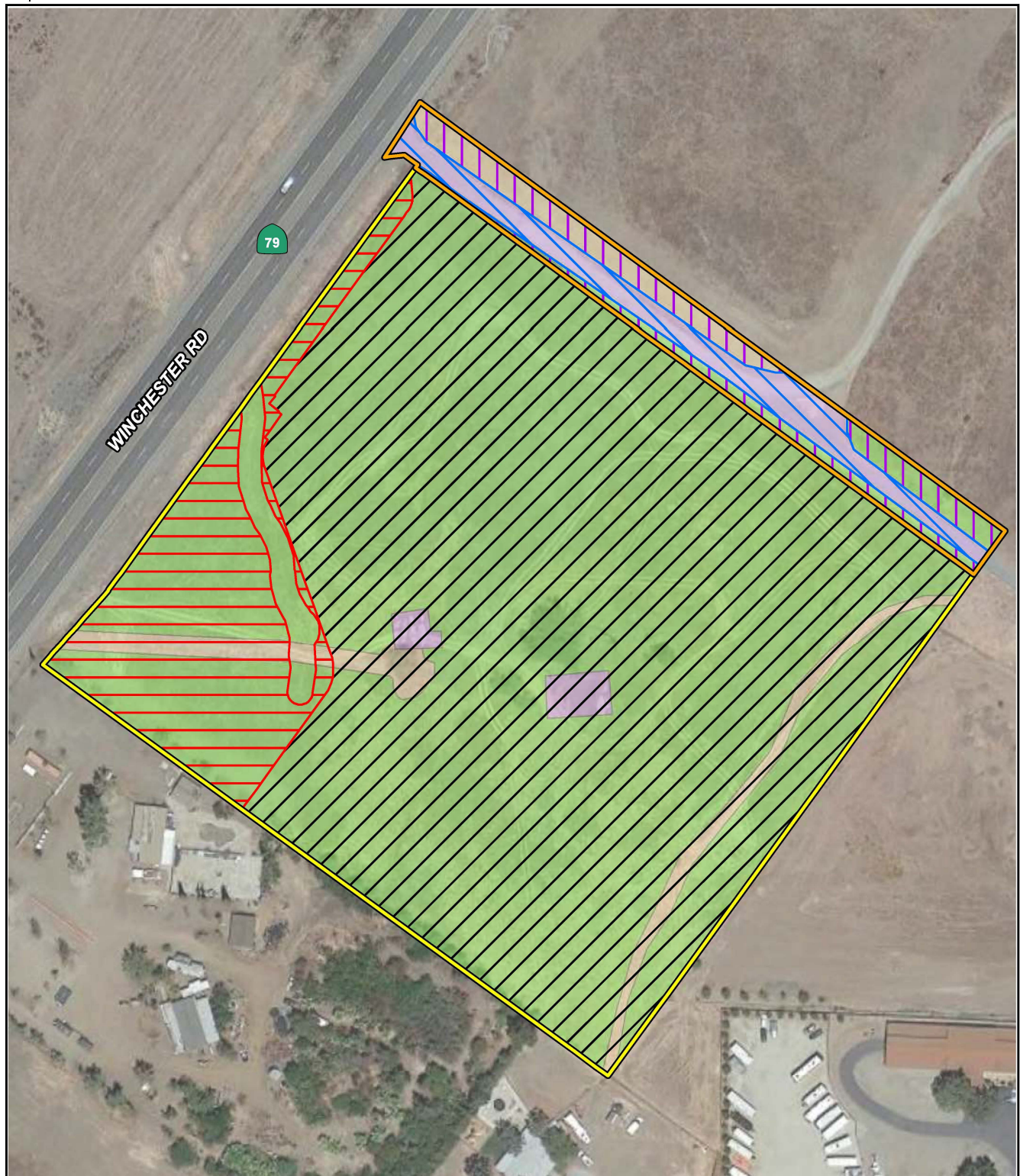
The project was evaluated in respect to MSHCP Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs and Procedures) of Volume I of the MSHCP. A summary of the outcomes of the project site and off-site surveys and conclusions Appendices B and D follows.

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

No vernal pools were observed on the project site or off-site improvement areas. As determined in the Western Riverside County Multiple Species Habitat Conservation and Consistency Analysis and Biology Report (Appendix C), a drainage feature is located on the southwestern portion of the project site (D-1). As shown in Figures 4 and 7, the project is designed to avoid D-1 in its entirety, and therefore a Determination of Biologically Equivalent or Superior Preservation (DBESP) is not required for this feature under the MSHCP. Consistent with the MSHCP as an avoided riparian/riverine feature, the project would place the drainage feature under a conservation easement, deed restriction, or other method to protect it from future impacts.

As determined in the Supplemental Western Riverside County Multiple Species Habitat Conservation and Consistency Analysis and Biology Report (Appendix E), a drainage feature is located near the intersection of Coventry Lane and Keller Road (D-2). The project's off-site improvements include paving Coventry Lane and therefore would result in permanent impacts to D-2 (Figure 8). As shown in Table 6, the project would result in permanent impacts to 0.003 acre of RWQCB non-wetland waters of the State (WOTS), 0.006 acre of CDFW streambed/MSHCP Riverine, and 0.012 acre of CDFW associated riparian/MSHCP Riparian. As required under the MSHCP, a DBESP was prepared for impacts to D-2 to show that the project design (including mitigation) is biologically equivalent or would have superior preservation to what would have occurred without the project.

As determined in the DBESP and incorporated as mitigation measure BIO-1, the project would require that permanent impacts to 0.003 acre of RWQCB non-wetland WOTS, 0.006 acre of CDFW streambed/MSHCP Riverine, and 0.012 acre of CDFW associated riparian/MSHCP Riparian be compensated at a 1.5:1 ratio through on-site restoration by expanding the drainage on the southwestern portion of the project site and having the land be conserved in perpetuity prior to the start of construction (see Figure 8). In addition, mitigation measure BIO-2 would require the project proponent to coordinate with the RWQCB to obtain a Water Quality Certification pursuant to Section 401 of the



- Project Boundary
- Offsite Work Area

- Vegetation**
- Developed
 - Disturbed
 - Nonnative Grassland

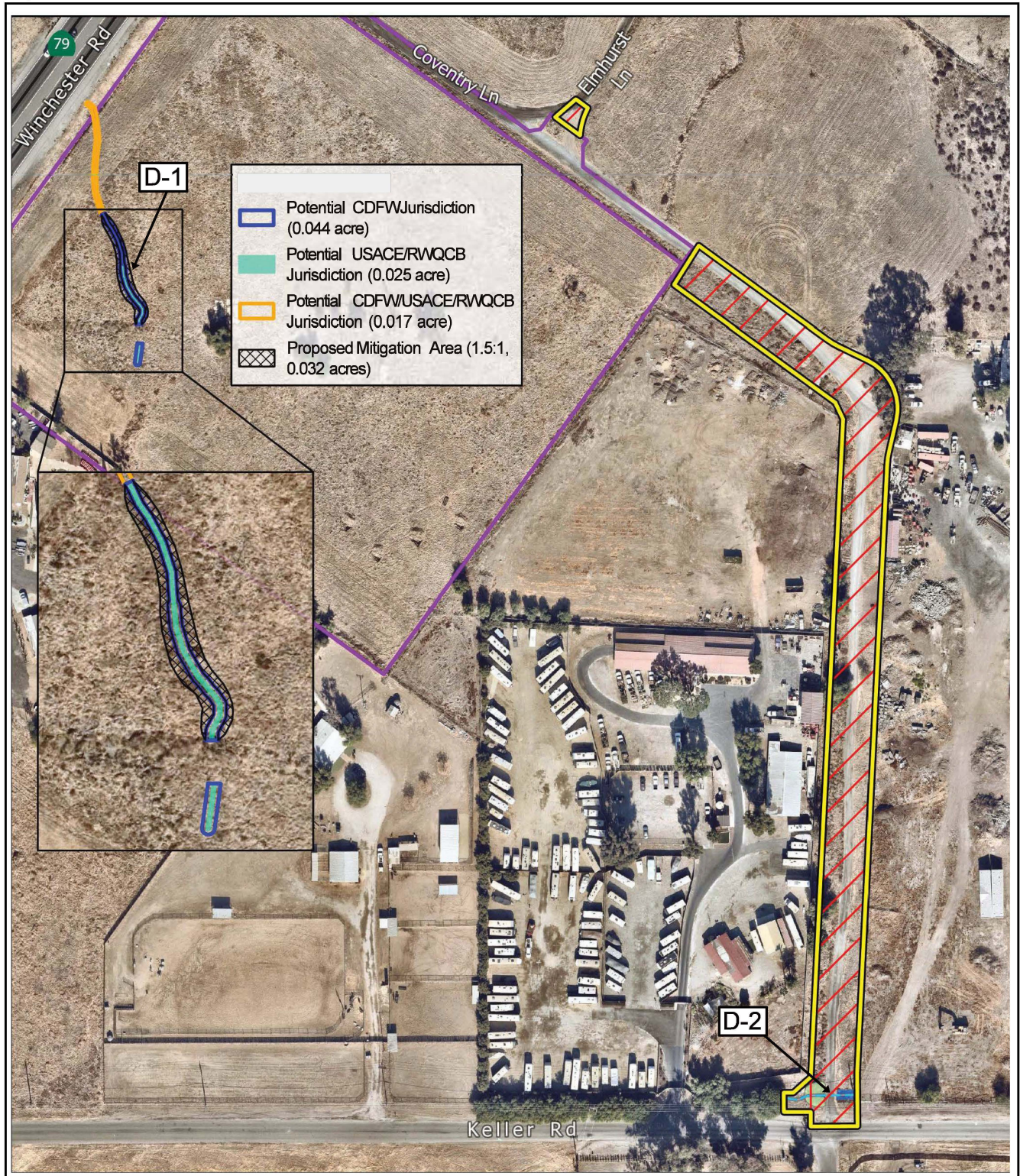
- Temporary Impacts
- Permanent Impacts
- Proposed Plan Area
- Fuel Modification Area - 100 ft
- Offsite Work Area

0 75 150
FEET



FIGURE 7

Impacts to Biological Resources



- Supplemental Project Area
- Previous Project Areas Analyzed
- Permanent Impact
- Proposed Mitigation Area (1.5:1, 0.032 acres)

- Roadside Drainage (93.79 linear feet)
- CDFW Associated Riparian/MSHCP Riparian (0.015 acres)
- CDFW Bank-to-Bank/MSHCP Riverine (0.007 acres)
- RWQCB Non-wetland WOTS (0.004 acres)

0 87.5 175
FEET



FIGURE 8
Impacts to Biological Resources
and Proposed Mitigation for Offsite Improvements

Clean Water Act (CWA) prior to the commencement of construction activities. Mitigation measure BIO-2 would also require the project proponent to coordinate with the CDFW to obtain a Streambed Alteration Agreement. Therefore, implementation of mitigation measures BIO-1 and BIO-2 would reduce project impacts associated with riparian/riverine areas to a less than significant level.

Table 6: Delineation Results

Feature	USACE		RWQCB Non-Wetland WOTS (acres)		CDFW Streambed/MSHCP Riverine (acres)		CDFW Riparian/MSHCP Riparian (acres)	
	Total	Permanent Impact	Total	Permanent Impact	Total	Permanent Impact	Total	Permanent Impact
D-2	-	-	0.004	0.003	0.007	0.006	0.015	0.012
SOURCE: Appendix E CDFW = California Department of Fish and Wildlife; RWQCB = Regional Water Quality Control Board; WOTS = waters of the State								

Protection of Narrow Endemic Plant Species (Section 6.1.3)

Section 6.1.3 of the MSHCP requires focused surveys for specified sensitive plant species if the project is within a Narrow Endemic Plant Species Survey Area and suitable habitat is present. The project site and off-site improvements are not within a Narrow Endemic Plant Species Survey Area. No impact would occur.

Guidelines Pertaining to the Urban/Wildland Interface (Section 6.1.4)

The MSHCP Urban/Wildland Interface Guidelines are intended to address indirect effects associated with development located in proximity to a MSHCP Conservation Area. The project site and off-site improvements are located within the MSHCP Criteria Area. Pursuant to the Urban/Wildlands Interface guidelines presented in MSHCP Section 6.1.4, the project has the potential to indirectly affect wildlife movement through edge effects associated with locating a commercial facility in proximity to land described for conservation in the MSHCP Conservation Area. Edge effects are indirect effects associated with artificial lighting, increased noise, unnatural predators (e.g., domestic cats and other non-native animals), competitors (e.g., exotic plants and non-native animals), unauthorized recreational use that may damage vegetation and/or habitat, increased generation of dust and trash/debris, and effects on storm water and water quality. These effects, coupled with the alteration of existing on-site vegetation, may result in changes in the behavioral patterns of wildlife or reduce the amount or diversity of wildlife adjacent to the project site. Accordingly, an evaluation of potential edge effects of the project is presented below, pursuant to MSHCP Section 6.1.4, pertaining to the Urban/Wildlands interface. The project would be conditioned to comply with the following:

Drainage: Proposed developments in proximity to the MSHCP Conservation Area shall incorporate measures, including measures required through the National Pollutant Discharge Elimination System (NPDES) requirements, to ensure that the quantity and quality of runoff discharged to the MSHCP Conservation Area is not altered in an adverse way compared with existing conditions. In particular, measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into land described for conservation in the MSHCP Conservation Area. Stormwater systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that may degrade or harm biological resources or ecosystem processes within land described for conservation in the MSHCP Conservation Area. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. Regular maintenance shall occur to ensure effective operations of runoff control systems. Stormwater improvements shall be designed to prevent or reduce the release of toxins, chemicals,

petroleum products, exotic plant materials, and other elements that might degrade or harm biological resources or ecosystem processes within land described for conservation in the MSHCP Conservation Area.

A bioretention/detention basin would be installed and maintained in the southeastern portion of the project site and has been designed to prevent the release of toxins, chemicals, petroleum products or exotic plant materials that may originate from the project site. Therefore, the project would ensure the quantity and quality of runoff discharged from the project would not result in harm to biological resources or ecosystem processes within land described for conservation in the MSHCP Conservation Area due to drainage.

Toxics: Land uses proposed in proximity to the MSHCP Conservation Area that use chemicals or generate bioproducts such as manure that are potentially toxic or may adversely affect wildlife species, habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in discharge to the land described for conservation in the MSHCP Conservation Area. These potential toxicants are not anticipated to be substantially increased by the project nor would the project produce bioproducts or other potentially toxic substances. As discussed above, any stormwater improvements would be designed to prevent or reduce toxic loads.

Lighting: Lighting may cause change in wildlife behavior including alterations of use and/or movement. This is especially concerning at wildlife crossings. The project would be required to adhere to County No. Ordinance 915 (Outdoor Lighting), which was established to provide minimum requirements for outdoor lighting in order to reduce light trespass. The implementation of County Ordinance No. 915 (Outdoor Lighting) would occur during the County's permitting process, to ensure the project's consistency with allowable placement and luminary standards. Therefore, the project is not anticipated to affect land described for conservation in the MSHCP Conservation Area due to lighting.

Noise: Proposed noise generating land uses affecting the MSHCP Conservation Area shall incorporate setbacks, berms, or walls to minimize the effects of noise on resources within land described for conservation in the MSHCP Conservation Area pursuant to applicable rules, regulations and guidelines related to land use noise standards. For planning purposes, wildlife within land described for conservation in the MSHCP Conservation Area should not be subject to noise that would exceed commercial noise standards.

The project is not anticipated to produce noise levels that would exceed commercial noise standards. In addition, a combination of concrete masonry unit block walls and wrought-iron fencing would be installed as part of the project to both prevent unauthorized access and reduce noise originating from the project site. Therefore, the project is not anticipated to affect land described for conservation in the MSHCP Conservation Area due to noise.

Invasives: Landscape plans for development that is proposed adjacent to land described for conservation in the MSHCP Conservation Area shall consider the invasive, nonnative plant species listed in Table 6-2 of the MSHCP and shall require revisions to landscape plants (subject to the limitations of their jurisdiction) to avoid the use of invasive species for the portions of development that are adjacent to land described for conservation in the MSHCP Conservation Area. Considerations in reviewing the applicability of this list shall include proximity of planting areas to the land described for conservation in the MSHCP Conservation Area, species considered in the planting plans, resources being protected and their relative sensitivity to invasion, and barriers to plant and seed dispersal, such as walls, topography and other features. Any proposed landscaping adjacent to land described for conservation in the MSHCP Conservation Area shall not be composed of invasive, nonnative plants listed in Table 6-2 of the MSHCP. As shown in the landscape plan (Figure 5), the project would adhere to this requirement.

Barriers: Proposed land uses adjacent to land described for conservation in the MSHCP Conservation Area shall incorporate barriers, where appropriate in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping. Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage, and/or other appropriate mechanisms.

The land described for conservation in the MSHCP Conservation Area currently occurs along public roadways, including Winchester Road, Elmhurst Lane, and residential areas. Winchester Road has existing barbed-wire fencing located parallel to it. Elmhurst Lane currently does not have any installed barriers adjacent to it. Consistent with existing barriers, the barbed-wire fencing along Winchester Road would continue to exist, and no new barriers would be installed along Elmhurst Lane. As described above, the project would install a combination of concrete masonry unit block walls and wrought-iron perimeter fencing to both prevent unauthorized access and reduce noise originating from the project site. Additionally, since the project includes commercial development, predatory wildlife such as domestic cats and other non-native animals is not expected to be introduced to the project site through its operation when compared, for example, to a residential use where occupants may harbor pets. Further, development of the project is expected to reduce unauthorized public access to the site (e.g., off-highway vehicle travel, loitering, and dumping of trash) through the development and use of commercial facilities and installed lighting.

Grading/Land Development: Manufactured slopes, FMZs, basins, or other improvements shall not extend into land described for conservation in the MSHCP Conservation Area. Additionally, none of the aforementioned grading/land development activities would occur outside of the project site or off-site work area.

As outlined above, the project would comply with the MSHCP Urban/Wildlife Interface guidelines. Therefore, impacts would be less than significant.

Additional Survey Needs and Procedures (Section 6.3.2)

Criteria Area Plant Species: The project site and off-site improvements are not within a mapped survey area for Criteria Area Species Survey Area plant species. Therefore, no impact would occur.

Amphibians: The project site and off-site improvements are not within a mapped survey area for amphibian species. Therefore, no impact would occur.

Burrowing Owl: The project site and off-site improvements are within the MSHCP burrowing owl survey area. Habitat suitability for burrowing owl was assessed during the site visits on November 18, 2021, (Appendix C) and December 16, 2024 (Appendix E). Due to the presence of suitable habitat found within an MSHCP burrowing owl survey area, focused surveys were conducted pursuant to the Burrowing Owl Survey Instructions for the Western Riverside MSHCP Area (see Attachment 2 of Appendix C). Although no burrowing owl individuals, sign, or suitable burrows or burrow surrogates were observed within the project site during the focused surveys, the project site contains suitable low-lying vegetation to support this species. Therefore, significant impacts could occur to this species during grading and construction activity. To reduce potentially significant impacts, mitigation measure BIO-3 would require a pre-construction take avoidance survey to ensure no burrowing owls have entered the project site to avoid direct take of burrowing owls, if present. Implementation of mitigation measure BIO-3 would reduce potential impacts to burrowing owl to a less than significant level.

Mammals: The project site and off-site improvements are not within a mapped survey area for mammals. Therefore, no impact would occur.

Overall, implementation of mitigation measures BIO-1, BIO-2, and BIO-3 would reduce potential impacts regarding project conflicts with an adopted Habitat Conservation Plan, Natural Conservation

Community Plan, or other approved local, regional, or state conservation plan to a less than significant level.

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

Less than Significant with Mitigation Incorporated. No critical habitat occurs on the project site. The project site is within the MSHCP SKR HCP fee area. Thus, the project would be required to pay Western Riverside County MSHCP fees pursuant to County Ordinance No. 810 and SKR mitigation fees pursuant to County Ordinance No. 663. Due to the absence of suitable habitat, Crotch's bumble bee is not expected to occur.

As discussed above, the project site is within the MSHCP survey area for burrowing owl; therefore, focused burrowing owl breeding season surveys (March 1 to August 31) were conducted. Although no burrowing owl individuals, sign, or suitable burrows or burrow surrogates were observed within the project site during the focused surveys, the project site contains suitable low-lying vegetation to support this species. Therefore, significant impacts could occur to this species during grading and construction activity. To reduce potentially significant impacts, mitigation measure BIO-3 would require a pre-construction take avoidance survey to ensure no burrowing owls have entered the project site to avoid direct take of burrowing owls, if present. Implementation of mitigation measure BIO-3 would reduce potential impacts to burrowing owl to a less than significant level. Implementation of mitigation measure BIO-3, and payment of the required fees would reduce potential impacts on 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) to a less than significant level.

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

Less than Significant with Mitigation Incorporated. As described in the previous response, one suitable burrowing owl burrow was observed on the project site but no burrowing owl or their sign were observed during the focused burrowing owl survey. Since burrowing owl was not detected during the focused survey, a DBESP would not be required under the MSHCP. Mitigation measure BIO-3 would require a burrowing owl preconstruction survey due to the presence of suitable habitat in the form of nonnative grassland. Project adherence to mitigation measure BIO-3 would reduce potential impacts to burrowing owl to a less than significant level.

During the bird breeding season (typically February 1 through August 31), electrical distribution poles and large trees on or adjacent to the project site may be used by hawks, ravens, or other large birds for nesting. Trees, shrubs, and other vegetation may provide nest sites for smaller birds, and burrowing owls may nest in ground squirrel burrows, pipes, or similar features. Most birds and their active nests are protected from "take" (meaning destruction, pursuit, possession, etc.) under the Migratory Bird Treaty Act and/or Sections 3503 through 3801 of the California Fish and Game Code. Activities that cause destruction of active nests, or that cause nest abandonment and subsequent death of eggs or young, may constitute violations of one or both laws resulting in a potentially significant impact. Implementation of mitigation measure BIO-4 would require a preconstruction nesting bird survey if vegetation is to be removed during the nesting season (February 1 through August 31).

Further, the project would be required to pay Western Riverside County MSHCP fees pursuant to County Ordinance No. 810 and SKR mitigation fees pursuant to County Ordinance No. 663.

Implementation of mitigation measures BIO-3 and BIO-4, and payment of the required fees would reduce potential impacts related to candidate, sensitive, or special status species in local or regional plans, or state regulations to a less than significant level.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact. Wildlife movement includes seasonal migration along corridors and daily movements for foraging. Migration corridors may include areas of unobstructed movement of deer, riparian corridors providing cover for migrating birds, routes between breeding waters and upland habitat for amphibians, and areas between roosting and feeding areas for birds. The project site does not contain any essential connectivity areas, natural landscape blocks, natural areas small or potential riparian connections, as documented in the California Essential Habitat Connectivity Project report.

The project site is located within Proposed Constrained Linkage 17 as identified in the MSHCP. However, the project site is not located within any proposed cores or habitat blocks or existing cores and linkages. The project site is bordered by existing paved roads and development on two of the four adjoining properties that restrict wildlife movement in the project vicinity. The majority of wildlife movement within the project site is anticipated to be limited to wildlife present on site or within the nonnative grasslands to the adjoining northwest and northeast of the project site. The project would not substantially limit wildlife movement in the region as areas within the central portion of Proposed Constrained Linkage 17 to the north that support greater opportunity for wildlife movement would remain intact and are generally undeveloped besides existing paved roadways.

Pursuant to the Urban/Wildlands Interface guidelines presented in MSHCP Section 6.1.4, the project has the potential to indirectly affect wildlife movement through edge effects associated with locating a commercial facility in proximity to a MSHCP Conservation Area. Specifically, project lighting may cause change in wildlife behavior including alterations of use and/or movement. The project would be required to adhere to County No. Ordinance 915 (Outdoor Lighting), which was established to provide minimum requirements for outdoor lighting in order to reduce light trespass. The implementation of County Ordinance No. 915 (Outdoor Lighting) would occur during the County's permitting process, to ensure the project's consistency with allowable placement and luminary standards. Therefore, the proposed project would not result in impacts related to established native resident or migratory wildlife corridors, and impacts would be less than significant.

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

Less than Significant Impact. The project site contains three land cover types: nonnative grasslands, disturbed land, and developed land. None of these land covers are riparian habitats, oak woodlands, or vernal pools or are considered natural communities of interest. Therefore, impacts to natural communities of interest would not occur on the project site.

In accordance with Section 1602 of the California Fish and Game Code, CDFW asserts jurisdiction over rivers, streams, and lakes, as well as any riparian vegetation associated with those features. As determined in the MSHCP Consistency Analysis and Biology Report (Appendix C), there are no rivers or lakes within or immediately adjacent to the project limits, but as previously mentioned, D-1 is present on the southwestern portion of the project site. However, D-1 lacks any associated riparian habitat. The project has been designed to avoid D-1 in its entirety; therefore, a DBESP would not be required under the MSHCP for D-1. Consistent with the MSHCP as an avoided riparian/riverine feature, D-1 would be placed under a conservation easement, deed restriction, or other method to protect it from future

impacts. The method and timing of protection would be discussed with the Western Riverside County Regional Conservation Authority and is anticipated to be in place prior to the start of construction activities.

As determined in the Supplemental Western Riverside County Multiple Species Habitat Conservation and Consistency Analysis and Biology Report (Appendix E), the project is expected to result in permanent impacts to D-2 due to the paving of Coventry Lane (see Figure 8). As shown in Table 6 above, the project would result in permanent impacts to 0.003 acre of RWQCB non-wetland WOTS, 0.006 acre of CDFW streambed/MSHCP Riverine, and 0.012 acre of CDFW associated riparian/MSHCP Riparian. As required under the MSHCP, a DBESP was prepared for impacts to D-2 to show that the project design (including mitigation) is biologically equivalent or would have superior preservation to what would have occurred without the project.

As determined in the DBESP and incorporated as mitigation measure BIO-1, the project would require that permanent impacts to 0.003 acre of RWQCB non-wetland WOTS, 0.006 acre of CDFW streambed/MSHCP Riverine, and 0.012 acre of CDFW associated riparian/MSHCP Riparian be compensated at a 1.5:1 ratio through on-site restoration by expanding D-1 on the southwestern portion of the project site and having the land be conserved in perpetuity prior to the start of construction. In addition, mitigation measure BIO-2 would require the project proponent to coordinate with the RWQCB to obtain a Water Quality Certification pursuant to Section 401 of the CWA prior to the commencement of construction activities. Mitigation measure BIO-2 would also require the project proponent to coordinate with the CDFW to obtain a Streambed Alteration Agreement. Implementation of the approved DBESP and mitigation measures BIO-1 and BIO-2 would reduce project impacts on riparian habitat or other sensitive natural communities to a less than significant level.

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

Less than Significant Impact. As determined in the MSHCP Consistency Analysis and Biology Report (Appendix C), there are no rivers or lakes within or immediately adjacent to the project limits, but as previously mentioned D-1 is present on the southwestern portion of the project site. However, D-1 lacks any associated riparian habitat. The project has been designed to avoid D-1 in its entirety; therefore, a DBESP would not be required under the MSHCP for D-1. Consistent with the MSHCP as an avoided riparian/riverine feature, D-1 would be placed under a conservation easement, deed restriction, or other method to protect it from future impacts. The method and timing of protection would be discussed with the Western Riverside County Regional Conservation Authority and is anticipated to be in place prior to the start of construction activities.

As determined in the Supplemental Western Riverside County Multiple Species Habitat Conservation and Consistency Analysis and Biology Report (Appendix E), the project is expected to result in permanent impacts to D-2 due to the paving of Coventry Lane (see Figure 8). As shown in Table 6 above, the project would result in permanent impacts to 0.003 acre of RWQCB non-wetland WOTS, 0.006 acre of CDFW streambed/MSHCP Riverine, and 0.012 acre of CDFW associated riparian/MSHCP Riparian. As determined in the DBESP and incorporated as mitigation measure BIO-1, the project would require that permanent impacts to 0.003 acre of RWQCB non-wetland WOTS, 0.006 acre of CDFW streambed/MSHCP Riverine, and 0.012 acre of CDFW associated riparian/MSHCP Riparian be compensated at a 1.5:1 ratio through on-site restoration by expanding D-1 on the southwestern portion of the project site and having the land be conserved in perpetuity prior to the start of construction. In addition, mitigation measure BIO-2 would require the project proponent to coordinate with the RWQCB to obtain a Water Quality Certification pursuant to Section 401 of the CWA prior to the commencement of construction activities. Mitigation measure BIO-2 would also require the project proponent to coordinate with the CDFW to obtain a Streambed Alteration Agreement. Therefore,

implementation of mitigation measures BIO-1 and BIO-2 would reduce project impacts on riparian habitat or other sensitive natural communities to a less than significant level. Implementation of the approved DBESP and mitigation measures BIO-1 and BIO-2 would reduce any impacts to state and federal wetlands to a less than significant level.

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

Less than Significant Impact. The project would not conflict with any local policies or ordinances protecting biological resources. See prior discussions regarding compliance with the MSHCP. The County has two tree management ordinances; one which manages the removal of oak trees, and the other that manages the removal of trees above 5,000 feet in elevation. The project site does not contain any oak trees, and the elevation of the project site ranges from 1,430 to 1,455 feet above mean sea level. In addition, the project would be required to pay fees pursuant to County Ordinance No. 810 (Western Riverside County MSHCP Fee Program Ordinance) and County Ordinance No. 663 (SKR Mitigation Fee Ordinance). Thus, the project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and impacts would be less than significant.

Mitigation:

Mitigation Measure BIO-1: To compensate for the permanent loss of 0.003 acre of Regional Water Quality Control Board non-wetland waters of the State, 0.006 acre of California Department of Fish and Wildlife streambed/Multiple Species Habitat Conservation Plan Riverine, and 0.012 acre of California Department of Fish and Wildlife associated riparian/Multiple Species Habitat Conservation Plan Riparian, the project shall mitigate on-site. Jurisdictional areas that are permanently impacted by construction activities shall be compensated at a 1.5:1 ratio through the creation of additional jurisdictional aquatic resources and riparian vegetation within the unnamed jurisdictional drainage feature present within Assessor's Parcel Number 472-110-038. The unnamed drainage feature located on Assessor's Parcel Number 472-110-038 shall be conserved in perpetuity prior to the start of construction. Exact requirements shall be finalized during the permitting process.

Implementation of an on-site Habitat Mitigation Monitoring Plan shall be prepared and shall include an implementation plan, site preparation, seed and plant material, installation methods, maintenance methods, performance standards, maintenance and monitoring success criteria, and reporting measures. The Habitat Mitigation Monitoring Plan shall be reviewed and approved by the Regional Conservation Authority and the Wildlife and Regulatory Agencies prior to any ground-disturbing activities. The percent cover for on-site mitigation will be based on the percent of native cover prior to construction. The mitigation area shall be maintained until performance standards are achieved, which is anticipated to be approximately five years. The mitigation area shall be fenced and conserved in perpetuity prior to the start of construction. A Long-Term Management Plan shall be prepared and shall include specific measures to address long-term conservation of the mitigation area including monitoring, management and protection measures. The Long-Term Management Plan shall be reviewed and approved by the Regional Conservation Authority and the Wildlife and Regulatory Agencies.

Mitigation Measure BIO-2: Prior to commencement of construction activities, the project proponent shall coordinate with the Regional Water Quality Control Board to obtain a Water Quality Certification pursuant to Section 401 of the Clean Water Act. Furthermore, the project proponent shall coordinate with the California Department of Fish and Wildlife to obtain a Streambed Alteration Agreement.

Mitigation Measure BIO-3: A pre-construction burrowing owl survey in accordance with the Multiple Species Habitat Conservation Plan shall be required within 30 days prior to ground disturbance to ensure no burrowing owls have entered the project site, and to avoid direct take of burrowing owls, if present.

The survey shall include all areas where suitable habitat is present within the project boundary. Additionally, if burrowing owls have colonized the project site prior to the initiation of construction, the project proponent shall immediately inform the California Department of Fish and Wildlife and the Western Riverside County Regional Conservation Authority. Approval of a Burrowing Owl Protection and Relocation Plan by the California Department of Fish and Wildlife prior to initiating ground disturbance would be required. Translocation of any owls present on-site would be required to occur within the non-breeding season. With implementation of the 30-day preconstruction survey and the Burrowing Owl Protection and Relocation Plan, if warranted, impacts to burrowing owl, including possible take of active nests, would be avoided.

Mitigation Measure BIO-4: To remain in compliance with the Migratory Bird Treaty Act and California Fish and Game Code 3503, 3503.5, and 3513, no direct impacts shall occur to any nesting birds, their eggs, chicks, or nests. If vegetation removal activities were to occur during the bird breeding season of February 1 to August 31, a qualified biologist shall conduct a pre-construction nesting bird survey. The pre-construction nesting bird survey shall be conducted by a biologist who holds a current Memorandum of Understanding with the County of Riverside. If nesting activity is observed, appropriate avoidance measures shall be adopted to avoid any potential impacts to nesting birds. The nesting bird survey must be completed no more than three days prior to any ground disturbance. If ground disturbance does not begin within three days of the survey date, a second survey shall be conducted. If nesting birds are discovered within the project site, the project's biologist shall mark a buffer around the nest. At a minimum, construction activities will stay outside of a 300-foot buffer around the active nests. For raptor species, the buffer is to be expanded to 500 feet. The approved buffer zone shall be marked in the field with construction fencing, and no vegetation clearing or ground disturbance shall commence until the qualified biologist and Riverside County Environmental Programs Division (EPD) of the Planning Department verify that the nests are no longer occupied and/or the juvenile birds can survive independently from the nests. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, normal construction activities may occur within the buffer. The project's biologist shall monitor the active nest during construction activity to ensure no disturbance to the birds are occurring, and shall have the authority to halt ground-disturbing activities if they are impacting the nesting birds. Prior to issuance of a permit for grading, including permits for clearing, grubbing, and/or stockpiling, the project's consulting biologist shall prepare and submit a report, documenting the results of the survey to EPD for review. The pre-construction survey shall cover the project site and any off-site improvements. In some cases, EPD may also require a Monitoring and Avoidance Plan prior to the issuance of a rough grading permit.

Monitoring: Surveys shall be conducted by a qualified biologist in coordination with the County Biologist.

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

Source(s): Phase I Cultural Resources Assessment prepared by RECON Environmental Inc. (Appendix G)

Findings of Fact:

a) Would the project alter or destroy a historic site?

Less Than Significant with Mitigation Incorporated. The records search results from the California Historical Resources Information System, Eastern Information Center (EIC) at the University of California, Riverside, prepared for the Phase I Cultural Resources Assessment (Appendix G) identified 33 previously recorded cultural resources within one mile of the area of potential effect (APE). The APE consists of the entire 11.12-acre project parcel and the 1.71-acre off-site improvement area for a total of 12.83 acres. Of the 33 previously recorded cultural resources, 20 are prehistoric resources (of which six are prehistoric isolated artifacts), and 13 are historic-era resources. One previously recorded resource, a barn (P-33-007802), was recorded within the project boundaries by J. Warner in 1983. Warner assigned significance to the barn as it was one of few remaining in Riverside County and stated that it is a valuable historic resource because of its unaltered condition. The barn—owned by E.C. and Patricia Box at the time of recording in 1983 was not associated with a significant event or person important to the nation, California's past, or locally (CEQA criteria 1 and 2, County criterion a). The barn could not be linked with persons important to Riverside County's past (County criterion b). The barn was representative of the method of construction (Vernacular wood frame barn that is rectangular in plan with a corrugated sheet metal gable roof, exposed eaves, plank siding, a hayloft overhang with opening, and an arched opening to a shed area on one side) of barns of the 1930s, therefore possessing a distinctive characteristic of type, period, region, or method of construction, but the barn has been destroyed; therefore, the foundations and other associated features do not qualify under CEQA criterion 3, County criterion c. The remnant concrete foundation or any of the newly observed features are not likely to yield information important to history (CEQA criterion 4, County criterion d). Therefore, the recorded resource (P-33-007802) is not a significant resource under the CEQA or County significance criteria. Impacts would be less than significant.

Further, the project site has been disturbed by structure development, pad grading, grading associated with the construction of Winchester Road/SR-79, roads, channelizing a watercourse, past agricultural ground disturbing activities, periodic discing and vegetation mowing maintenance, and varying materials of surface debris. Given past disturbances, the possibility of buried intact significant prehistoric or historic cultural resources being present within the project site is considered low. Nonetheless, unknown human remains and/or cultural resources could be discovered during grading and construction activities, the loss of which would be a significant impact. Implementation of mitigation measures CUL-1 through CUL-6 would reduce impacts related to historical and archaeological resources to a less than significant level.

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

Less Than Significant with Mitigation Incorporated. As previously described under 8.a., one previously recorded resource, a barn (P-33-007802), was recorded within the project boundaries, but is not a significant resource under the CEQA or County significance criteria. As described in the Phase I Cultural Resources Assessment (Appendix G), the project APE has been previously disturbed by structure development, pad grading, grading associated with the construction of Winchester Road/SR-79, dirt roads, improved roads, channelizing a watercourse, storm water features, past agricultural ground disturbing activities, periodic discing and vegetation mowing maintenance, and varying materials of surface debris. Given past disturbances, the possibility of buried intact significant prehistoric or historic cultural resources being present within the project APE is considered low. However, unknown human remains and/or cultural resources could be discovered during grading and construction activities, the loss of which would be a significant impact. Implementation of mitigation measures CUL-1 through CUL-6 would reduce impacts related to historical and archaeological resources to a less than significant level.

Mitigation:

Mitigation Measure CUL-1: 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.

Mitigation Measure CUL-2: The developer/permit holder or any successor in interest shall comply with the following for the life of this permit. If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed:

All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis.

Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

*A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other.

**If not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

Mitigation Measure CUL-3: Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

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

Mitigation Measure CUL-4: Prior to the 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 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.

Mitigation Measure CUL-5: Prior to the Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigation(s) and/or Phase III data recovery.

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

Prehistoric Resources – One of the following treatments shall be applied:

- a. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloguing, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.
- b. If reburial is not agreed upon by the Consulting Tribes, then the resources shall be curated in a culturally appropriate manner at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing of sacred items, burial goods and Native American human remains.

Mitigation Measure CUL-6: Prior to Grading Permit Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigation Standard Scopes of Work posted on the Riverside County Transportation and Land Management Agency (TLMA) website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the pre-grade meeting and evidence that artifacts have been treated in accordance to procedures stipulated in the Cultural Resources Management Plan.

Monitoring: Construction monitoring by Archaeological Monitor(s) and Native American Monitor(s) during all initial ground disturbing activities and excavation of soils in each portion of the project site including clearing, grubbing, tree removals, grading, and trenching.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
9. Archaeological Resources				
a) Alter or destroy an archaeological site?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Source(s): Phase I Cultural Resources Assessment prepared by RECON Environmental Inc. (Appendix G)

Findings of Fact:

a) Would the project alter or destroy an archaeological site?

Less than Significant with Mitigation Incorporated. The project site has been disturbed by structure development, pad grading, grading associated with the construction of Winchester Road/SR-79, roads, channelizing a watercourse, past agricultural ground disturbing activities, periodic disking and vegetation mowing maintenance, and varying materials of surface debris. As previously described under 8.a., a records search was conducted of the archaeological databases maintained at the California Historical Resources Information System, EIC at University of California, Riverside. The records search found one previously recorded resource, a barn (P-33-007802), which was recorded within the project boundaries by J. Warner in 1983. The barn was not found to be a significant historic resource under the CEQA or County significance criteria. Furthermore, the Phase I Cultural Resources Assessment (Appendix G), found no existing archaeological resources at the project site. Given past disturbances, the possibility of buried intact significant prehistoric or historic cultural resources being present within the project APE is considered low. However, unknown human remains and/or cultural resources could be discovered during grading and construction activities, the loss of which would be a significant impact. Implementation of mitigation measures CUL-1 through CUL-6 would reduce impacts related to an archaeological site to a less than significant level.

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

Less than Significant with Mitigation Incorporated. As described in the previous response, the Phase I Cultural Resources Assessment (Appendix G) prepared for the project did not identify any archaeological resources within the project site. Implementation of mitigation measures CUL-1 through CUL-6 would reduce impacts related to archaeological resources to a less than significant level.

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

Less than Significant with Mitigation Incorporated. There are no dedicated cemeteries or recorded burials within the project site or surrounding area. Therefore, the potential for encountering human remains during construction is very low. The project would be required to implement mitigation measure CUL-1, which provides guidance on the discovery of human remains. Implementation of mitigation measure CUL-1 would reduce impacts related to human remains to a less than significant level.

Mitigation: See mitigation measures CUL-1 through CUL-6 as outlined in Section 8, above.

Monitoring: Construction monitoring by Archaeological Monitor(s) and Native American Monitor(s) during all initial ground disturbing activities and excavation of soils in each portion of the project site including clearing, grubbing, tree removals, grading, and trenching.

ENERGY Would the project:

10. Energy Impacts

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

☐
☐
☒
☐

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

☐
☐
☒
☐

Source(s): Riverside County Climate Action Plan (CAP; County of Riverside 2019a); Greenhouse Gas Analysis prepared by RECON Environmental, Inc. (Appendix H)

Findings of Fact:

a) Would the project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact.

Construction

Construction of the project would consume energy in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, as well as delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction activities related to the project are not expected to result in demand for fuel greater on a per-development basis than other development projects in southern California.

Construction of the project would result in fuel consumption from the use of construction tools and equipment, vendor and haul truck trips, and vehicle trips generated from construction workers traveling to and from the site. There are no unusual project characteristics that would cause the use of construction equipment that would be less energy efficient compared with other similar construction sites in other parts of the state. Therefore, construction-related fuel consumption by the project would not result in inefficient, wasteful, or unnecessary energy use compared with other construction sites in the region, and impacts would be less than significant.

Operation

Once operational, the project would generate demand for electricity and natural gas. Operational use of energy includes the heating, cooling, and lighting of the building, water heating, operation of electrical systems and plug-in appliances, parking lot and outdoor lighting, and the transport of electricity, natural

gas, and water to the areas where they would be consumed. This use of energy is typical for self-storage and RV storage developments, and no operational activities or land uses would occur that would result in extraordinary energy consumption.

The State of California provides a minimum standard for building design and construction standards through Title 24 of the California Code of Regulations. Compliance with Title 24 is mandatory at the time new building permits are issued by local governments. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation, and air conditioning equipment; energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, etc. In complying with the Title 24 standards, impacts to peak energy usage periods would be minimized, and impacts on statewide and regional energy needs would be reduced. Thus, the operation of the project would not use large amounts of energy or fuel in a wasteful manner, and no operational energy impacts would occur.

Therefore, construction and operations-related fuel consumption by the project would not result in inefficient, wasteful, or unnecessary energy use compared with other construction sites in the region, and impacts would be less than significant.

b) Would the project conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?

Less than Significant Impact. The California Title 24 Building Energy Efficiency Standards are designed to ensure new and existing buildings achieve energy efficiency and preserve outdoor and indoor environmental quality. These measures (Title 24, Part 6) are listed in the California Code of Regulations. The California Energy Commission is responsible for adopting, implementing, and updating building energy efficiency. Local city and county enforcement agencies have the authority to verify compliance with applicable building codes, including energy efficiency. As required by County Ordinance No. 457 (also known as the County Green Building Ordinance), prior to the issuance of a building permit, the project applicant shall submit plans showing that the project would be in compliance with 2022 Title 24 requirements. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts related to conflicts or obstructions with renewable energy or energy efficiency plans 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
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): Preliminary Geotechnical Interpretive Report prepared by Earth Strata Geotechnical Services, Inc. (Appendix I); County of Riverside Map My County v11.9 Report for APN 472-110-038 (County of Riverside 2024a)

Findings of Fact:

- 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?**

Less than Significant Impact. The project site is not located within an Alquist-Priolo Earthquake Fault zone. The closest known fault to the project site is the Elsinore Fault which is located approximately 8.26 miles from the project site. While light to moderate shaking of the site can be expected to occur during the lifetime of the project, the project site is located outside any fault hazard zones. Further, the project would be designed in accordance with the current version of the CBC. Therefore, impacts from ground rupture of a known earthquake fault 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
12. Liquefaction Potential Zone				
a) Be subject to seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

Source(s): Preliminary Geotechnical Interpretive Report prepared by Earth Strata Geotechnical Services, Inc. (Appendix I)

Findings of Fact:

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

Less than Significant Impact. Liquefaction occurs as a result of a substantial loss of shear strength or shearing resistance in loose, saturated, cohesionless earth materials subjected to earthquake induced ground shaking. Potential impacts from liquefaction include loss of bearing capacity, liquefaction related settlement, lateral movements, and surface manifestation such as sand boils. Seismically induced settlement occurs when loose sandy soils become denser when subjected to shaking during an earthquake. The three factors determining whether a site is likely to be subject to liquefaction include seismic shaking, type and consistency of earth materials, and groundwater level. As described in the Preliminary Geotechnical Interpretive Report (Appendix I), the proposed self-storage structures would be supported by compacted fill and competent bedrock, with no shallow groundwater. As such, the potential for earthquake induced liquefaction and lateral spreading beneath the proposed structures is considered very low to remote due to the recommended compacted fill, relatively low groundwater level, and the dense nature of the deeper on-site earth materials. Further, all structures built in the County are required to be developed in compliance with the CBC (California Code of Regulations, Title 24, Part 2), which is adopted as County Ordinance No. 457. Compliance with the CBC would require proper construction of building footings and foundations so that it would withstand the effects of potential ground movement, including liquefaction.

The County Department of Building and Safety reviews structural plans and geotechnical data prior to issuance of a grading permit and conducts inspections during construction, which would ensure that all required CBC (California Building Standards Commission) measures are incorporated. Compliance with the CBC as included as a condition of approval and verified by the County's review process would ensure that impacts regarding liquefaction 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
13. Ground-shaking Zone				
a) Be subject to strong seismic ground shaking?	☐	☐	☒	☐

Source(s): Preliminary Geotechnical Interpretive Report prepared by Earth Strata Geotechnical Services, Inc. (Appendix I)

Findings of Fact:

a) Be subject to strong seismic ground shaking?

Less than Significant Impact. The project site, like most of southern California, could be subject to seismically related strong ground shaking. Ground shaking is a major cause of structural damage from earthquakes. The amount of motion expected at a building site can vary from none to forceful depending upon the distance to the fault, the magnitude of the earthquake, and the local geology.

The closest known fault to the project site is the Elsinore Fault which is located approximately 8.26 miles from the project site. Structures built in the County are required to be built in compliance with the CBC (California Code of Regulations, Title 24, Part 2), which is adopted as County Ordinance No. 457 and provides provisions for earthquake safety based on factors including building occupancy type, the types of soils on-site, and the probable strength of ground motion. Compliance with the CBC would require the incorporation of the following: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structure so that it would withstand the effects of strong ground shaking.

The County Department of Building and Safety permitting process would ensure that all required CBC seismic safety measures are incorporated into the building. Compliance with the CBC as verified by the County's review process and included as a condition of approval, would reduce impacts related to strong seismic ground shaking to a less than significant level.

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): Preliminary Geotechnical Interpretive Report prepared by Earth Strata Geotechnical Services, Inc. (Appendix I)

Findings of Fact:

- a) **Would the project 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?**

Less than Significant Impact. Landslides are the downhill movement of masses of earth and rock and are often associated with earthquakes; but other factors, such as the slope, moisture content of the soil, composition of the subsurface geology, heavy rains, and improper grading can influence the occurrence of landslides. As described in the Preliminary Geotechnical Interpretive Report (Appendix I), no landslides are known to exist, or have been mapped, in the vicinity of the project site. Further, geologic mapping of the project site conducted during the geotechnical investigation, along with a review of aerial imagery of the site, reveals no geomorphic expressions indicative of landsliding. As such, no landslides on or adjacent to the project site would occur.

Lateral spreading is a type of liquefaction induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements, and such movement typically damages pipelines, utilities, bridges, and structures. The potential for earthquake induced lateral spreading beneath the proposed structures is considered very low to remote due to the recommended compacted fill, relatively low groundwater level, and the dense nature of the deeper on-site earth materials. As such, the potential for earthquake induced lateral spreading beneath the proposed structures is considered very low.

All structures built in the County are required to be developed in compliance with the CBC (California Code of Regulations, Title 24, Part 2), which is adopted as County Ordinance No. 457. Compliance with the CBC would require proper construction of building footings and foundations so that it would withstand the effects of potential ground movement, including landslides, lateral spreading, collapse, or rockfall hazards. Impacts would be less than significant with compliance with the mandatory CBC requirements.

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
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): Preliminary Geotechnical Interpretive Report prepared by Earth Strata Geotechnical Services, Inc. (Appendix I)

Findings of Fact:

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

Less than Significant Impact. Ground subsidence is the gradual settling or sinking of the ground surface with little or no horizontal movement, and occurs in areas with subterranean oil, gas, or groundwater. Effects of subsidence include fissures, sinkholes, depressions, and disruption of surface drainage. Subsidence from scarification and recompaction of exposed bottom surfaces is expected to be negligible to approximately 0.01 foot. Project risk of subsidence would be lowered through adherence to CBC grading and earthwork operation recommendations. Further, no groundwater was encountered on-site, therefore the potential of subsidence from withdrawal of water is negligible. Impacts 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
16. Other Geologic Hazards				
a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?	☐	☐	☐	☒

Source(s): Preliminary Geotechnical Interpretive Report prepared by Earth Strata Geotechnical Services, Inc. (Appendix I)

Findings of Fact:

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

No Impact. A seiche is the sloshing of a closed body of water from earthquake shaking. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. Since the site is at an elevation of more than 1,400 feet above mean sea level and the nearest water body, Diamond Valley Lake, is located approximately 2.5 miles northeast of the project site, no impacts from a seiche would occur.

A mudflow is an earthflow consisting of material that is wet enough to flow rapidly and typically occurs in small, steep stream channels. The project site does not contain steep slopes and is not adjacent to any steep slopes that could be subject to mudflow. Therefore, the project would not be subject to mudflow.

In addition, there are no known volcanoes in the project region. Thus, impacts related to volcanic hazards would not occur. Overall, the project would not result in impacts related to seiche, mudflow, or volcanic hazards, and no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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): Preliminary Geotechnical Interpretive Report prepared by Earth Strata Geotechnical Services, Inc. (Appendix I)

Findings of Fact:

a) Would the project change topography or ground surface relief features?

No Impact. As discussed in the Preliminary Geotechnical Interpretive Report (Appendix I), the project site and the adjacent parcels are relatively flat. The elevation of the project site is approximately 1,400 feet above mean sea level and the project site does not contain steep slopes and is not adjacent to any steep slopes. Project grading would consist of a net export of 662 cubic yards. The project would not change topography or ground surface relief features. No impact would occur.

b) Would the project create cut or fill slopes greater than 2:1 or higher than 10 feet?

No Impact. As described in the previous response, project grading would consist of a net export of 662 cubic yards. The project does not propose cut or fill slopes greater than 2:1 or higher than 10 feet. No impact would occur.

c) Would the project result in grading that affects or negates subsurface sewage disposal systems?

Less than Significant Impact. The project would include the installation of a septic system that would include a leach field located beneath the RV storage area on the northeastern portion of the project site. The installation would be completed pursuant to the County's and service provider's required specifications for septic system installation such that the project would not negate the use of the sewage disposal systems. Therefore, impacts 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
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 (2025), 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): Preliminary Geotechnical Interpretive Report prepared by Earth Strata Geotechnical Services, Inc. (Appendix I); Onsite Wastewater Treatment System (OWTS) Report prepared by Earth Strata Geotechnical Services, Inc. (Appendix J); County of Riverside Ordinance No. 754 (County of Riverside 2020b)

Findings of Fact:

a) Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. Construction of the project has the potential to contribute to soil erosion and the loss of topsoil. Grading activities that would be required for the project could expose and loosen topsoil, which could then be eroded by wind or water. However, County Ordinance No. 754 (Stormwater Management and Discharge Controls) implements the requirements of the California RWQCB and Riverside County, NPDES Storm Water Permit Order No. R8-2010-0033 (Municipal Separate Storm Sewer Systems Permit). Application of these regulations establishes minimum stormwater management requirements and controls that would be implemented for the project.

To further reduce the potential for soil erosion and the loss of topsoil, the project would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), pursuant to County and RWQCB regulations. The SWPPP would be developed by a qualified SWPPP developer and implemented by the County's conditions of approval. The SWPPP is required to address site-specific conditions related to specific grading and construction activities that could cause erosion and the loss of topsoil and provide erosion control best management practices (BMPs) to reduce or eliminate the erosion and loss of topsoil. Erosion control BMPs include use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding, etc. Detailed measures applicable to the project site and grading requirements would be provided within the context of the SWPPP and implemented as conditions of project approval.

The project would also include the installation of permanent landscaping throughout the project site. The proposed landscaping would limit the areas of loose topsoil that could be eroded by wind or water, eliminating the possibility of erosion. In addition, as described in Section 23, Hydrology and Water Quality, the hydrologic features of the project have been designed to slow, filter, and retain stormwater within landscaping and the proposed detention/bioretention basin, which would also reduce the potential for stormwater to erode topsoil. Furthermore, implementation of the project would be conditioned on County approval of a Water Quality Management Plan (WQMP), which would ensure that RWQCB requirements and appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. As a result, with implementation of existing requirements, impacts related to substantial soil erosion or loss of topsoil would be less than significant.

b) **Would the project be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2025), creating substantial direct or indirect risks to life or property?**

Less than Significant Impact. As described in the Preliminary Geotechnical Interpretive Report (Appendix I), the earth materials on-site exhibit a medium expansion potential as classified in accordance with in 2025 CBC Section 1803.5.3 and ASTM D 4829. The project would be required to incorporate the recommendations in the Preliminary Geotechnical Interpretive Report into the final plans. Additionally, the project would be required to comply with CBC standards as required by County Ordinance 457. Therefore, impacts related to expansive soils would be less than significant.

c) **Would the project have soils incapable of adequately supporting use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

Less than Significant Impact. The project proposes the installation of a septic system and would not utilize sewer systems. The proposed septic system would be sized to meet disposal needs for all wastewater generated on-site. As described in the OWTS Report (Appendix J), the project site would be able to support a primary and expansion OWTS that would meet the current standards of the Department of Environmental Health and the RWQCB and the Local Agency Management Program. The applicable recommendations outlined in the OWTS Report would be included as conditions of project approval. In addition, project compliance with the requirements of the CBC as part of the building plan check and development review process would ensure that soil related impacts 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
19. Wind Erosion and Blows and from project either on or off site.	☐	☐	☒	☐
a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?				

Source(s): General Plan Safety Element (County of Riverside 2024b); County Ordinance No. 460, Article XV & Ord. No. 484

Findings of Fact:

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

Less than Significant Impact. As discussed in the General Plan Safety Element, the Coachella Valley, the Santa Ana River Channel in northwestern Riverside County, and areas in and around the cities of Hemet and San Jacinto are areas with high wind erosion susceptibility. The project site is not located within any of these wind erosion susceptibility areas. Ground disturbance during project construction could increase the potential for wind erosion by loosening soils and generating soil stockpiles. However, through implementation of County Ordinance No. 457 and Board of Supervisors Policy F-6, the County

prohibits grading without permits, levies penalties for illegal grading, and requires the restoration of illegally graded land to prevent off-site drainage and slope erosion. As part of the conditions for the issuance of grading permits, the project would be required to implement BMPs for erosion. The project would implement SCAQMD Rule 402 and Rule 403, which would reduce construction erosion impacts. SCAQMD Rule 402 requires dust suppression techniques to be implemented to prevent dust and soil erosion from creating a nuisance off-site. SCAQMD Rule 403 requires control measures to reduce fugitive dust from active operations, storage piles, or disturbed surfaces, with a goal to omit visibility beyond the property line or avoid exceedance of 20 percent opacity. Compliance with these federal, regional, and local requirements would reduce the potential for on-site and off-site erosion effects to accepted levels during project construction. Once construction is complete, surfaces would be paved or developed with landscaping, which would reduce the potential for wind erosion. Therefore, the project would not be impacted by or result in an increase in wind erosion and blow sand, either on- or off-site, and impacts 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
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): Greenhouse Gas Analysis prepared by RECON Environmental, Inc. (Appendix H); CAP (County of Riverside 2019a); California Renewables Portfolio Standard Annual Report (California Public Utilities Commission 2023); Connect SoCal (Southern California Association of Governments 2024); Vehicle Miles Traveled (VMT) Assessment prepared by Linscott, Law & Greenspan, Engineers (Appendix K)

Thresholds

The analysis methodologies from the SCAQMD and the Riverside County CAP are used in evaluating potential impacts related to greenhouse gas (GHG) from implementation of the project.

SCAQMD: SCAQMD does not have approved thresholds; however, SCAQMD does have draft thresholds that provide a tiered approach to evaluate GHG impacts. The current interim SCAQMD thresholds consist of the following:

- Tier 1 consists of evaluating whether the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.

- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
 - Residential and Commercial land use: 3,000 metric tons of carbon dioxide equivalent (MT CO₂E) per year
 - Industrial land use: 10,000 MT CO₂E per year
 - Based on land use type: residential: 3,500 MT CO₂E per year; commercial: 1,400 MT CO₂E per year; or mixed use: 3,000 MT CO₂E per year
- Tier 4 has the following options:
 - Option 1: Reduce business as usual emissions by a certain percentage; this percentage is currently undefined.
 - Option 2: Early implementation of applicable Assembly Bill (AB) 32 Scoping Plan measures
 - Option 3, 2020 target for service populations (SP), which includes residents and employee: 4.8 MT CO₂E/SP/year for projects and 6.6 MT CO₂E/SP/year for plans;
 - Option 4, 2035 target: 3.0 MT CO₂E/SP/year for projects and 4.1 MT CO₂E/SP/year
- Tier 5 involves mitigation offsets to achieve target significance threshold.

In addition, SCAQMD methodology for projects' construction is to average them over 30 years and then add them to the project's operational emissions to determine if the project would exceed the screening values listed above.

Climate Action Plan: The County adopted a CAP on December 8, 2015. The CAP was designed under the premise that the County's emission reduction efforts should coordinate with the state strategies of reducing emissions in order to accomplish these reductions in an efficient and cost-effective manner. The County CAP Update, November 2019 (CAP Update) establishes GHG emission reduction programs and regulations that correlate with and support evolving State GHG emissions reduction goals and strategies. The CAP Update includes reduction targets for year 2030 and year 2050. These reduction targets require the County to reduce emissions by at least 525,511 MT CO₂E below the Adjusted Business as Usual scenario by 2030 and at least 2,982,948 MT CO₂E below the Adjusted Business as Usual scenario by 2050 (County of Riverside 2019a, p. 7-1).

In order to evaluate consistency of development projects with the CAP, the CAP includes Screening Tables to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. The CAP contains a menu of measures potentially applicable to discretionary development that include energy conservation, water use reduction, increased residential density or mixed uses, transportation management and solid waste recycling. Individual sub-measures are assigned a point value within the overall screening table of GHG implementation measures. The point values are adjusted according to the amount of GHG emissions are reduced by the measures.

The CAP identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 MT CO₂E per year is used to determine if additional analysis is required. The 3,000 MT CO₂E per year value is used in defining small projects that, when combined with the modest efficiency measures required by Title 24 requirements, are considered less than significant. Projects that exceed the 3,000 MT CO₂E per year are required to quantify and disclose the anticipated GHG emissions, then either 1) demonstrate GHG emissions reductions at project buildout year levels from implementation of project design features and/or mitigation measures to reduce GHG emissions or 2) garner 100 points through the screening tables.

Projects that garner at least 100 points (equivalent to an approximate 49 percent reduction in GHG emissions) are determined to be consistent with the reduction quantities anticipated in the CAP. As such, pursuant to the County's CAP, projects that achieve a total of 100 points or more are considered to have a less than significant individual and cumulative impact on GHG emissions.

Findings of Fact:

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

Less than Significant Impact. The purpose of the CAP is to provide guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County. To address the state's requirement to reduce GHG emissions, the County prepared its CAP with the goal of reducing GHG emissions within the County by 49 percent below "existing" 2008 levels by the year 2030 and 83 percent below the 2008 baseline levels by 2050. The County's GHG reduction targets are consistent with AB 32, SB 32, and Executive Order S-3-05, and ensure that the County is providing GHG reductions locally that will complement the state and international efforts of stabilizing climate change.

As discussed, the CAP identifies a two-step approach in evaluating GHG emissions, first using a screening threshold of 3,000 MT CO₂E per year. As shown in Table 7, the project would result in 603 MT CO₂E per year, which would be less than the screening threshold of 3,000 MT CO₂E. The project would therefore result in emissions that are small enough that they would not conflict with the implementation of the CAP, and utilization of the Screening Tables is not required. Because the project would emit less than 3,000 MT CO₂ per year, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts would be less than significant.

Table 7: Project GHG Emissions

Source	Project GHG Emissions (MT CO ₂ E)
Mobile	269
Energy ¹	211
Area	2
Water/Wastewater	66
Solid Waste	33
Construction (Amortized over 30 years)	21
Total	603
<i>SCAQMD Screening Threshold</i>	<i>3,000</i>
¹ Note that the project would include a solar photovoltaic system as required by the CAP that would reduce the project's GHG emissions associated with electricity. As a conservative calculation, reductions due to solar were not taken into account. SCAQMD = South Coast Air Quality Management District; MT CO ₂ E = metric tons of carbon dioxide equivalent	

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

Less than Significant Impact. As previously stated, pursuant to 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 AB 32, SB 32, and the County's CAP are discussed below. It should be noted that the project's consistency with the SB 32 (2017 Scoping Plan) also satisfies consistency with AB 32 since the 2017 Scoping Plan is based on the overall targets established by AB 32. Consistency with the 2008 Scoping Plan is not necessary, since the target year for the 2008 Scoping Plan was 2020, and the project's buildout year is 2025. As such, the 2008 Scoping Plan does not apply and consistency with the 2017 Scoping Plan is relevant. Project consistency with SB 32 and County's CAP is evaluated in the following discussion.

State Plans

SB 32/2017 Scoping Plan Consistency

The 2017 Scoping Plan Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Table 8 summarizes the project's consistency with the 2017 Scoping Plan. As summarized, the project will not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories. Additionally, the project would be consistent with the County's CAP, which includes reduction targets that are consistent with the state's SB 32 reduction goals. Thus, the project would also be consistent with the state's reduction goals.

AB 1279/2022 Scoping Plan Consistency

AB 1279, the California Climate Crisis Act, codified the carbon neutrality target as 85 percent below 1990 levels by 2045. The 2022 Scoping Plan was adopted in December 2022. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. Appendix D of the 2022 Scoping Plan includes local actions that jurisdictions may take to reduce GHG emissions in line with AB 1279 goals. It includes project attributes for residential and mixed-use projects to qualitatively determine consistency with the 2022 Scoping Plan; however, it does not include measures specific to other land use projects, such as the project.

However, the project would support the 2022 Scoping Plan key prioritization strategies and provide its "fair share" contribution towards the statewide goal of carbon neutrality by 2045. The project would use energy from Southern California Edison (SCE), which is on track to achieve future Renewables Portfolio Standard goals. The project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Additionally, the project would comply with the 2022 Title 24 Building Energy Efficiency Standards and the 2022 California Green Buildings Standards Code requirements. The project is consistent with the region's Sustainable Communities Standard (SCS), Connect SoCal, and would result in less than significant VMT impacts (Appendix K). Given the reasonably anticipated decline in project emissions that would occur post-construction, the project is in line with the GHG reductions needed to achieve the 2045 GHG emission reduction targets identified by AB 1279.

Regional Plans

In addition to being consistent with the CAP, the project was evaluated for consistency with the SCS strategies contained in Connect SoCal. As discussed in Table 9 below, the project would be consistent with applicable Connect SoCal strategies. In addition, the project would also be required to comply with the California Green Buildings Standards Code Building Code as included in County Ordinance No. 457 to ensure efficient use of energy. Therefore, the project would not conflict with an applicable regional plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and impacts would be less than significant.

Local Plans

As previously stated, the project would result in 603 MT CO₂E per year, which would be less than the screening threshold of 3,000 MT CO₂E. Thus, project-related emissions would not have a significant direct or indirect impact on GHG and climate change and would not require additional analysis. Therefore, the project would not conflict with an applicable state plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and impacts would be less than significant.

Table 8: 2017 Scoping Plan Consistency Summary

Action	Responsible Parties	Consistency
Implement Senate Bill (SB) 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	California Public Utilities Commission, California Energy Commission, California Air Resources Board (CARB)	Consistent. The project would use energy from Southern California Edison (SCE). SCE has committed to diversifying its portfolio of energy sources by increasing energy from wind and solar sources. The project would not interfere with or obstruct SCE energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		Consistent. The project would be designed and constructed to implement energy efficiency measures for new industrial developments and would include several measures designed to reduce energy consumption. The project would not interfere with or obstruct policies or strategies to establish annual targets for statewide energy efficiency savings and demand reduction.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load serving entities and publicly-owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		Consistent. The project would be designed and constructed to implement energy efficiency measures, where applicable by including several measures designed to reduce energy consumption. The project would include energy efficient field lighting and fixtures that meet the current Title 24 Standards throughout the project site and would be a modern development; boilers, heaters, and air conditioning systems would thus be energy efficient.

Action	Responsible Parties	Consistency
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty EVs by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, Governor's Office of Land Use and Climate Innovation (LCI), Local Agencies	Consistent. This is a CARB Mobile Source Strategy. The project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty electric vehicle (EV) 2025 targets.
At least 4.2 million zero emission and plug-in hybrid light-duty EVs by 2030.		Consistent. This is a CARB Mobile Source Strategy. The project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		Consistent. This is a CARB Mobile Source Strategy. The project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations.
Medium- and Heavy-Duty GHG Phase 2.		Consistent. This is a CARB Mobile Source Strategy. The project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO _x standard.		Consistent. This is a CARB Mobile Source Strategy. The project would not obstruct or interfere with CARB efforts to improve transit-source emissions.
Last Mile Delivery: New regulation that would result in the use of low NO _x or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		Consistent. This is a CARB Mobile Source Strategy. The project would not obstruct or interfere with CARB efforts to improve last-mile delivery emissions.

Action	Responsible Parties	Consistency
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		Consistent. This project would not obstruct or interfere with the implementation of SB 375 and would therefore not conflict with this measure.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	Consistent. This is a CARB Mobile Source Strategy. The project would not obstruct or interfere with CARB efforts to Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, LCI, CARB, Governor's Office of Business and Economic Development (GOBiz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	Consistent. The project would not obstruct or interfere with agency efforts to harmonize transportation facility project performance with emissions reductions and increase competitiveness of transit and active transportation modes.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	Consistent. The project would not obstruct or interfere with agency efforts to develop pricing policies to support low GHG transportation.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, California Environmental Protection Agency (CalEPA), California Natural Resources Agency (CNRA), CARB, Caltrans, CEC, GO-Biz	Consistent. This measure would apply to all trucks accessing the project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector. The project would not obstruct or interfere with agency efforts to Improve freight system efficiency.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		Consistent. The project would not obstruct or interfere with agency efforts to deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.

Action	Responsible Parties	Consistency
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	Consistent. When adopted, this measure would apply to all fuel purchased and used by the project in the state. The project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18 percent.
Implement the Short-Lived Climate Pollutant Strategy (SLCP Strategy) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, California Department of Food and Agriculture (CDFA), California State Water Resource Control Board (SWRCB), Local Air Districts	Consistent. The project would be required to comply with any applicable measures that may be adopted for the purpose of reducing SLPS emissions. The project would not obstruct or interfere with agency efforts to reduce SLPS emissions since it would be required to comply with any applicable regulatory measures.
50% reduction in black carbon emissions below 2013 levels.		Consistent. The project would implement waste reduction and recycling measures consistent with State and County requirements. The project would not obstruct or interfere with agency efforts to support organic waste landfill reduction goals in the SLCP Strategy and SB 1383.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP Strategy and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	Consistent. The project would be required to comply with any applicable Cap-and-Trade Program provisions. The project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	Consistent. The project would be required to comply with any applicable Cap-and-Trade Program provisions. The project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.

Action	Responsible Parties	Consistency
By 2018, Develop Integrated Natural and Working Lands Implementation Plan to Secure California's Land Base as a Net Carbon Sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments within CDFA, CalEPA, CARB	Consistent. The project would not obstruct or interfere with agency efforts to protect land from conversion through conservation easements and other incentives. The project site is not targeted for conservation in any local or state conservation plan.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.		Consistent. The project site is vacant disturbed property and does not comprise an area that would effectively provide for carbon sequestration. The project would not obstruct or interfere with agency efforts to increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.		Consistent. Where appropriate, the project design does not preclude the incorporation of wood or wood products. The project would not obstruct or interfere with agency efforts to encourage the use of wood and agricultural products to increase the amount of carbon stored in the natural and built environments.
Establish scenario projections to serve as the foundation for the Implementation Plan.		Consistent. The project would not obstruct or interfere with agency efforts to establish scenario projections to serve as the foundation for the Implementation Plan.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.	CARB	Consistent. The project would not obstruct or interfere with agency efforts to establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	Consistent. The project would not obstruct or interfere with agency efforts to implement the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies and Local Agencies	Consistent. The project would not obstruct or interfere with agency efforts to identify and expand funding and financing mechanisms to support GHG reductions across all sectors.

Table 9: Project Consistency with Connect SoCal Strategies

Goal	Policies/Strategies	Project Consistency
Mobility: Build and maintain an integrated multimodal transportation network		
<ul style="list-style-type: none"> • Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions. • Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities. • Support planning for people of all ages, abilities and backgrounds. 	<ul style="list-style-type: none"> • System Preservation and Resilience – Maintain the operational efficiency of the transportation system. • Complete Streets- Support the safety, comfort, and mobility for all road users. • Transit and Multimodal Integration – Support more seamless connections across modes, especially via first/last mile connection, those occurring between transit/rail and biking, walking, or rolling, and ensuring platforms exist to facilitate trip planning and payments. • Transportation Systems Management (TSM) – Maximize the functional capacity and efficiency of the existing transportation system. • Transportation Demand Management (TDM) – Reduce the demand for roadway travel, particularly during peak times or on congested routes. 	<p>Consistent. Strategies related to improving the transportation network, providing complete streets, transit and multimodal integration, and TSM are not directly applicable to the project. The project would not conflict with SCAG's efforts to achieve these goals. The project site is currently undeveloped. The project would construct a self-storage business on underutilized land to increase amenities to the community. The project would also provide sufficient parking that is consistent with the County's requirements for nonresidential development. In addition, the development is located adjacent to SR-79, which increases connectivity to retail centers.</p>
Communities: Develop, connect and sustain livable and thriving communities		
<ul style="list-style-type: none"> • Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances. • Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all household. 	<ul style="list-style-type: none"> • Priority Development Areas (PDAs) – Locate new households and jobs where people have opportunities for alternative modes of transportation or to take short trips. • Housing the Region – Provide sufficient housing opportunities throughout the region. • 15-Minute Communities – Provide to all basic, day-to-day needs, services and amenities within a 15-minute walk, bike or roll from one's home. • Equitable Engagement and Decision-Making – Strive for more equitable engagement and decision-making. 	<p>Consistent. Strategies related to housing are not applicable to the project. The project would provide storage options for residential uses in the project area.</p>
Environment: Create a healthy region for the people of today and tomorrow		
<ul style="list-style-type: none"> • Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change. • Integrate the region's development pattern and transportation network to 	<ul style="list-style-type: none"> • Sustainable Development – Support quality of life and economic growth for the region's present and future populations by ensuring that essential resources, such as water, energy and food supply, are responsibly managed. • Air Quality – Achieve emission reductions by providing a comprehensive and coordinated 	<p>Consistent. The project would not result in significant air quality or greenhouse gas (GHG) impacts and would not result in an inefficient use of energy. The project would be served by Southern California Edison, which has achieved 36 percent renewables and is on track to achieve future Renewables Portfolio Standards goals. The</p>

Goal	Policies/Strategies	Project Consistency
<p>improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.</p> <ul style="list-style-type: none"> • Conserve the region's resources. 	<p>regional solution with integrated land use and transportation planning.</p> <ul style="list-style-type: none"> • Clean Transportation – Transition to cleaner vehicles, both transit fleets, trucks and passenger vehicles, to support cleaner air quality. • Natural and Agricultural Land Preservation – Preserve natural and agricultural lands. • Climate Resilience – Provide regional coordination and solutions finding related to climate change's adverse impacts on the natural, social, economic and built environment, including transportation systems. 	<p>project's energy-related GHG emissions would decrease as Southern California Edison increases its renewables procurement beyond 2020 towards the 2030 goal of 60 percent.</p>
<p>Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region</p>		
<ul style="list-style-type: none"> • Improve access to jobs and educational resources. • Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities. 	<ul style="list-style-type: none"> • Goods Movement – Support the efficient movement of goods which depends directly on the physical transportation infrastructure. • Broadband – Support digital infrastructure which includes middle-mile physical infrastructure to connect to global networks and last-mile connections by local carriers. • Universal Basic Mobility – Provide qualified residents with subsidies for transit and other mobility services. • Workforce Development – Educate and train individuals to meet the needs of current and future businesses and industry in order to maintain a sustainable and competitive economic environment. • Tourism – Support the travel of not just those visiting from outside the region but also from within the region to reach the region's many destinations and attractions. 	<p>Consistent. Strategies related to the Southern California Association of Governments' efforts to support the economy are not directly applicable to the project.</p>

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
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): EnviroStor Database (Department of Toxic Substances Control 2025); Geotracker Database (State Water Resources Control Board 2025); County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan (County of Riverside 2023a); Phase I Environmental Site Assessment Report prepared by Geocon (Appendix L)

Findings of Fact:

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

Less than Significant Impact. A hazardous material is typically defined as any material that due to its quantity, concentration, or physical or chemical characteristics, poses a significant potential hazard to human health and safety or the environment if released. Hazardous materials may include, but are not limited to hazardous substances, hazardous wastes, and any material that would be harmful if released.

There are multiple state and local laws that regulate the storage, use, and disposal of hazardous materials. The County Department of Environmental Health Hazardous Materials Branch is the local administrative agency that coordinates regulatory programs that regulate use, storage, and handling of hazardous materials, including Hazardous Materials Business Plans. As required by the County's standard conditions of approval, should tenants of the proposed building utilize or transport hazardous materials, the tenant/business would also be required to comply with County Department of Environmental Health conditions, and if required, the California Accidental Release Program (CalARP). CalARP would require the tenant to provide a Risk Management Plan and allow site access for routine inspections of CalARP facilities.

Construction

Construction activities for the project would involve routine transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and calking. In addition, routine hazardous materials would be used for fueling and serving construction equipment on-site. These types of hazardous materials routinely used during construction are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by existing state and federal laws that the project is required to strictly adhere to. As a result, the routine transport, use or disposal of hazardous materials during construction activities for the project would be less than significant.

Operation

The project would operate a self-storage and RV storage facility, which generally uses limited hazardous materials, such as cleaning agents, paints, pesticides, and batteries. Normal routine use of these products would not result in a significant hazard to residents or workers in the vicinity of the project and impacts would be less than significant.

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

Less than Significant Impact.

The Phase I Environmental Site Assessment (Appendix L) did not identify any recognized environmental conditions on the project site. Recognized environmental conditions refers to the presence, or likely presence, of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. As described in Section 21.a, the project would handle all hazardous materials in accordance with all applicable federal, state, and local regulations. Furthermore, project construction would be required to implement the Division of Occupational Safety and Health of California Construction Safety Plan/Hazard Communication Program; in case of accidental release, the project would be required to comply with the Code of Federal Regulations Section 1910.120. Therefore, the project would not create upset and accident conditions that could result in the release of hazardous materials, and impacts would be less than significant.

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

No Impact. The County has implemented a Multi-Jurisdictional Local Hazard Mitigation Plan (County of Riverside 2023a) that identifies risks caused by natural and human-made disasters and ways to minimize the damage from those disasters. The project would operate a self-storage and RV storage facility that would be permitted and approved in compliance with existing safety regulations, such as the CBC and California Fire Code (included in County Ordinance No. 457 and County Ordinance No. 787, respectively) to ensure that it would not conflict with implementation of the Multi-Jurisdictional Local Hazard Mitigation Plan.

Construction

The proposed construction activities would occur within the project site and would not restrict access of emergency vehicles to the project site or adjacent areas. Therefore, impacts related to interference with an adopted emergency response of evacuation plan during construction activities would not occur.

Operation

Operation of the project would also not result in a physical interference with an emergency response evacuation. Direct access to the project site would be provided via Elmhurst Lane and Coventry Lane, which are adjacent to the project site. The project would also be required to design and construct internal access and provide fire suppression facilities (e.g., hydrants and sprinklers) in conformance with County Ordinances and the County Fire Department would review the development plans prior to approval to ensure adequate emergency access pursuant to the requirements in the International Fire Code and Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9. As a result, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no impact would occur.

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

No Impact. The closest school to the project site is Harvest Hill STEAM Academy, located approximately 1.6 miles southwest of the project site at 31600 Pat Road, Winchester, CA 92596. Therefore, no schools are located within 0.25 mile of the project site. Therefore, the use of hazardous materials and the generation of hazardous emissions within the project site would not pose a significant hazard at nearby schools and no impact would occur.

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

No Impact. Review of the Department of Toxic Substances Control Envirostor database (2025) and the State Water Resources Control Board Geotracker database (2025), determined that there are no contaminated sites on or adjacent to the project site. Therefore, the project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

Source(s): County of Riverside Map My County v11.9 Report for APN 472-110-038 (County of Riverside 2025); County of Riverside Southwest Area Plan (County of Riverside 2021a), New Compatibility Plan (County of Riverside Airport Land Use Commission 2024)

Findings of Fact:

a) Result in an inconsistency with an Airport Master Plan?

No Impact. The project is not located within an airport land use plan and is therefore not within an airport noise contour boundary, nor is the project site located within two miles of a public airport or public use airport (County of Riverside 2021a; County of Riverside Airport Land Use Commission 2024). The Perris Valley Airport is located approximately 16.3 miles northwest of the project site and the Hemet-Ryan Airport is located approximately 10.2 miles northeast of the project site. The project site is located outside of the Perris Valley Airport and Hemet-Ryan Airport Influence Area. Additionally, the March Air Reserve Base (ARB) is located approximately 24.3 miles northwest of the project site. The project site is located outside of the March ARB influence area. Therefore, the project would not result in an inconsistency with the Perris Valley Airport Master Plan, Hemet-Ryan Airport Master Plan or March ARB Master Plan. No impact would occur.

b) Require review by the Airport Land Use Commission?

No Impact. As described in Section 22.a, the project site is located approximately 16.3 miles from the Perris Valley Airport and 10.2 miles from the Hemet-Ryan Airport, and outside of both influence areas. Additionally, the project site is located approximately 24.3 miles from March ARB, and outside of its influence area. As a result, the project would not require review by the Airport Land Use Commission. No impact would occur.

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

No Impact. As described in Sections 22.a and b, the project site is located approximately 16.3 miles from the Perris Valley Airport and 10.2 miles from the Hemet-Ryan Airport, and outside of both influence areas. Additionally, the project site is located approximately 24.3 miles from March ARB, and outside of its influence area. Due to the distance from the Perris Valley Airport, Hemet-Ryan Airport, and March ARB, safety impacts to people residing or working in the project area related to the airports would not occur. No impact would occur.

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

No Impact. The project site is not located within the vicinity of a private airstrip and would not result in a safety hazard related to an airstrip for people residing or working in the project area. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY Would the project:				
23. Water Quality Impacts	☐	☐	☒	☐
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?	☐	☐	☒	☐
d) Result in substantial erosion or siltation on-site or off-site?	☐	☐	☒	☐
e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	☐	☐	☒	☐
f) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
g) Impede or redirect flood flows?	☐	☐	☒	☐
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	☐	☐	☐	☒
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Source(s): Riverside County General Plan Figure S-9 “Special Flood Hazard Areas”; Figure S-10 “Dam Failure Inundation Zone”; County Flood Control District Flood Hazard Report/ Condition, GIS database; State of California Department of Water Resources, 2021; Water Quality Management Plan prepared by Omega Consultants (Appendix M); County of Riverside Map My County v11.9 Report for APN 472-110-038 (County of Riverside 2025); Drainage Study prepared by Omega Engineering Consultants (Appendix B)

Findings of Fact:

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

Less than Significant Impact. As detailed in the WQMP (Appendix M) and Drainage Study (Appendix B), the existing drainage pattern would be integrated into the site plan in order to maintain time of concentration and infiltration rates of runoff. Additionally, a bioretention/detention basin with a capacity of 110,196 cubic feet would be located at the southeastern corner of the project site and would detain and infiltrate 100 percent of excess runoff generated by the increased impervious surfaces created by the project. Therefore, the project would not violate any water quality standards or waste discharge

requirements or otherwise substantially degrade surface or ground water quality and impacts would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than Significant Impact. The project would not use any groundwater. All water for the project would be provided by the EMWD. Although the project would increase impervious surfaces on-site from zero to 53 percent, the project would include 2.6 acres or 23.47 percent of landscaping that would allow for groundwater recharge. Furthermore, water would continue to infiltrate through undeveloped land throughout the groundwater basin. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level, and impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?

Less than Significant Impact. Development of the project would increase impervious surfaces on and off-site from zero percent to 53 percent. On-site drainage patterns would be modified; however, the project would result in a decrease in peak flow rate. The pre-developed site discharges 53.83 cubic feet per second (cfs). The post-developed site discharges 35.16 cfs. This is a decrease of 18.66 cfs, or 35 percent, under the predeveloped flow. This is a result of the bioretention/detention basin at the southeastern corner of the project site which would be sized to retain the 100-year, three-hour storm event volume without any discharge. Therefore, the project would not alter the existing drainage patterns. Since the project site is one acre or more, the project would be required to comply with all the applicable requirements of the NPDES and conform to NPDES BMPs for SWPPPs during the life of the permit. In addition, implementation of the project would require County approval of a project-specific WQMP to satisfy the requirements of the adopted NPDES program, which would be verified by the County's Building and Safety Division through the County's permitting process and through conditions of approval. Project conformance with these requirements would ensure BMPs are adequate to accommodate project runoff. Therefore, the project would not alter the existing drainage pattern of the site or area or impact the course of a stream or river, and impacts would be less than significant.

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

Less than Significant Impact. As described previously, existing RWQCB and County regulations require the project to implement a project specific SWPPP during construction activities, that would implement erosion control BMPs, such as silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding, etc. to reduce the potential for siltation or erosion. In addition, implementation of the project would require County approval of a project specific WQMP that would identify specific operational BMPs to ensure that operation of the self-storage facility would not result in erosion or siltation. With approval and implementation of project-specific water quality plans, impacts related to erosion or siltation on-site or off-site would be less than significant.

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

Less than Significant Impact. The project site is currently vacant and undeveloped. As discussed in the Drainage Study (Appendix B), drainage flows to the southeastern corner of the project site in the existing condition. The project site receives run-off from three locations: Run-on Point 1 is located at the northwestern corner of the project site, where a 24-inch culvert under Elmhurst Lane discharges to an on-site ditch; Run-on Point 2 is a separate 24-inch culvert that crosses Winchester Road, discharging to an on-site ditch at the midpoint of the western boundary; and the majority of Coventry Lane, being the portion that connects to Keller Road, drains via surface flow to a drainage ditch just adjacent to Keller Road.

The project would regrade the entire site and pave Coventry Lane, increasing impervious surfaces from zero percent to 53 percent. Increased impervious surfaces could substantially increase the rate and/or amount of run-off resulting in flooding. The project would construct drainage improvements to reduce existing flows. Off-site stormwater that enters the site at Run-on Point #1 through the existing 24-inch culvert would be intercepted by a proposed concrete channel, flowing to an existing earthen swale that would convey the stormwater along the southwesterly corner of the site, to another proposed concrete channel, to ultimately discharge to the neighboring lot at the same point as the existing conditions. The off-site runoff from Run-on Point #2 would confluence the stormwater from Run-on Point #1. As the neighboring lot does not have a well-defined channel to accept concentrated flow, the project would construct a flow spreader structure consisting of a rock-filled gabion wall that would slow down runoff and spread it into a wide sheet of flow prior to discharging to the neighboring lot. Off-site, Coventry Lane would be improved by paving the entire road up to Keller Road. Along with paving Coventry Lane, ditches with check dams would be constructed parallel to the paved road. The road would drain to a drainage ditch just adjacent to Keller Road. As detailed above, the project would result in a decrease in flow amount and rate.

Additionally, runoff generated by the project would be conveyed to a bioretention/detention basin at the southeastern corner of the project site. The bioretention/detention basin would treat 100 percent of excess runoff generated by the increased impervious surfaces created by the project. Therefore, drainage would be controlled and would not result in an increase in runoff that could result in on- or off-site flooding. In addition, a WQMP is required to be developed, approved, and implemented to satisfy the requirements of the adopted NPDES program, which would be verified by the County's Building and Safety Division through the County's permitting process to ensure that the project would meet the stormwater control requirements. Therefore, the project would not increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site, and impacts would be less than significant.

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

Less than Significant Impact. As described previously, the runoff generated by the project would be conveyed to a bioretention/detention basin at the southeastern corner of the project site. The bioretention/detention basin would treat 100 percent of excess runoff generated by the increased impervious surfaces created by the project. The bioretention/detention basin would be sized to accommodate the anticipated flows and would maintain drainage patterns, such that it would not exceed the capacity of the stormwater drainage system. Thus, runoff from the project site would not exceed the capacity of stormwater drainage systems.

In addition, a WQMP, is required to be developed, approved, and implemented to satisfy the requirements of the adopted NPDES program, which would be verified by the County's Building and Safety Division through the County's permitting process to ensure that the project would not provide

additional sources of polluted runoff. As listed previously in Section 18, implementation of a WQMP during the County's standard review and permitting process would result in less than significant impacts related to the stormwater drainage system and polluted runoff.

g) Impede or redirect flood flows?

Less than Significant Impact. A bioretention/detention basin at the southeastern corner of the project site would retain and convey storm flows to the drainage system. As detailed in 23.e, above, the project would not alter the existing drainage patterns. In addition, the project site is not located within a flood zone. Thus, the project would not impede or redirect flood flows. Impacts would be less than significant.

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

No Impact. As described above, the project site is not located within a flood zone. Therefore, the project would not potentially risk the release of pollutants due to project inundation. The project site is located approximately 33 miles northeast of the Pacific Ocean and separated by the Santa Ana Mountains. Therefore, the project site is not located within a tsunami zone and no impacts would occur. Similarly, a seiche is the sloshing of a closed body of water from earthquake shaking. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. There are no water bodies near enough to the project site to pose a flood hazard to the site resulting from a seiche. The nearest water bodies are Diamond Valley Lake, which is located approximately 2.5 miles northeast of the project site, and Skinner reservoir, which is located approximately 2.65 miles southeast of the project site. Therefore, the project would not risk the release of pollutants due to inundation of the project site. No impact would occur.

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

Less than Significant Impact. As described previously, the project would be required to have an approved SWPPP, which would include construction BMPs to minimize the potential for construction related sources of pollution. For operations, the project would be required to implement source control BMPs to minimize the introduction of pollutants; and treatment control BMPs to treat runoff. With implementation of the operational source and treatment control BMPs that would be required by the County during the permitting and approval process, potential pollutants would be reduced to the maximum extent feasible, and implementation of the project would not obstruct implementation of a water quality control plan. In addition, the project would not pump water and water supplies would be provided by EMWD. Thus, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts 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
LAND USE AND PLANNING Would the project:				
24. Land Use				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Source(s): County of Riverside Map My County v11.9 Report for APN 472-110-038 (County of Riverside 2025)

Findings of Fact:

a) Would the project disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?

No Impact. The project would develop and operate a self-storage and RV storage facility on an undeveloped site. The project site is situated immediately east of SR-79/Winchester Road and is bordered by Elmhurst Lane and Coventry Lane Road to the north, U-Haul Neighborhood Dealer to the south, and vacant land to the east. The project would consist of a general plan land use change from Rural Residential (RR) to Commercial Retail (CR) to allow for a self-storage and RV storage facility. The project would also include a zone change from Rural Residential (R-R-2 ½) to General Commercial (C-1/C-P). The project site is currently designated as Rural Residential (RR); however, the project site does not currently contain housing. Therefore, the project would not disrupt or divide the physical arrangement of an established community, and no impact would occur.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact. As previously described, the project site is situated immediately east of SR-79/Winchester Road and is bordered by Elmhurst Lane and Coventry Lane Road to the north, U-Haul Neighborhood Dealer to the south, and vacant land to the east. The project would consist of a general plan land use change from Rural Residential (RR) to Commercial Retail (CR) to allow for a self-storage and RV storage facility. The project would also include a zone change from Rural Residential (R-R-2 ½) to General Commercial (C-1/C-P). The project site also includes a Community Development Overlay (CDO) which allows for community development land use designations to be applied through General Plan Amendments within specified areas within Rural, Rural Community, Agriculture, or Open Space Foundation Component areas. The project would develop and operate a self-storage and RV storage facility which is consistent with the Community Development Overlay (CDO). Therefore, the project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts 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
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): County of Riverside General Plan Multipurpose Open Space Element Figure OS-6 “Mineral Resources Area” (County of Riverside 2015a)

Findings of Fact:

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

No Impact. General Plan Figure OS-6 “Mineral Resources Area” identifies Mineral Resource Zones (MRZs). The project site and vicinity are designated as Unstudied, which indicates that no MRZ designation has been issued. No mining activities occur within the project site or within the surrounding project vicinity. Thus, the project would not result in the loss of availability of a known mineral resource that would be of value to the region, or the residents of the state. No impact would occur.

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The General Plan Figure OS-6 “Mineral Resources Area” identifies the project site as Unstudied, which indicates that no MRZ designation has been issued. Thus, impacts related to the loss of availability of a mineral resource recovery site delineated on a land use plan would not occur from implementation of the project.

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

No Impact. There are no existing surface mines on or within the vicinity of the project site. Thus, impacts related to incompatible land uses in mine areas, and impacts related to exposure to hazards from quarries or mines would not occur from implementation of the project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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): County of Riverside Southwest Area Plan (County of Riverside 2021a), New Compatibility Plan (County of Riverside Airport Land Use Commission 2024)

Findings of Fact:

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

No Impact. The project is not located within an airport land use plan and is therefore not within an airport noise contour boundary, nor is the project site located within two miles of a public airport or public use airport (County of Riverside 2021a; County of Riverside Airport Land Use Commission 2024). The Perris Valley Airport is located approximately 16.3 miles northwest of the project site and the Hemet-Ryan Airport is located approximately 10.2 miles northeast of the project site. The project site is located outside of the Perris Valley Airport and Hemet-Ryan Airport Influence Area. Additionally, the March ARB is located approximately 24.3 miles northwest of the project site. The project site is located outside of the March ARB influence area. As a result, the project would not result in an inconsistency with the Perris Valley Airport Master Plan, Hemet-Ryan Airport Master Plan or March ARB Master Plan. No impact would occur. Therefore, the project would not expose people working on the project site to excessive noise levels associated with a public airport or public use airport. No impact would occur.

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

No Impact. The project site is not located within the vicinity of a private airstrip and would not result in excessive noise related to an airstrip. Therefore, the project would not expose people working on the project site to excessive noise levels associated with a private airstrip. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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): Noise Letter Report prepared by RECON (Appendix N); Riverside County General Plan, Table N-1 ("Land Use Compatibility for Community Noise Exposure") (County of Riverside 2015b)

County Noise and Vibration Standards

General Plan Noise Element Policy N 4.1: The exterior noise limit is not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 A-weighted decibels equivalent noise level [dB(A) L_{eq}] for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dB(A) L_{eq} during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m.

General Plan Noise Element Policy N 16.3: Prohibit exposure of residential dwellings to perceptible ground vibration. Perceptible motion shall be presumed to be a motion velocity of 0.01 inches/second over a range of 1 to 100 hertz.

Ordinance No. 847 Regulating Noise Section 2i, Construction Noise: Noise associated with any private construction activity located within one-quarter of a mile from an inhabited dwelling is considered exempt 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.

Findings of Fact:

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

Less Than Significant Impact.

Construction

As described above, County Ordinance No. 847 Section 2i exempts construction noise 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. The project would comply with the County's construction hours regulations, as required by standard County Conditions of Approval. The County does not establish a quantitative construction noise level limit. For the purposes of the noise analysis, the Federal Transit Administration-recommended threshold of 80 dB(A) L_{eq} at noise sensitive residential land uses was used.

The project site as well as the properties to the north, east, and south of the project site are designated as Rural Residential (RR) with a Community Development Overlay (CDO). The property northwest of the project site, across Winchester Road is designated as Commercial Retail and the properties south

of the intersection of Coventry Lane and Keller Road and designated as Medium Density Residential. The noise level limits for these land use designations are summarized in Table 10.

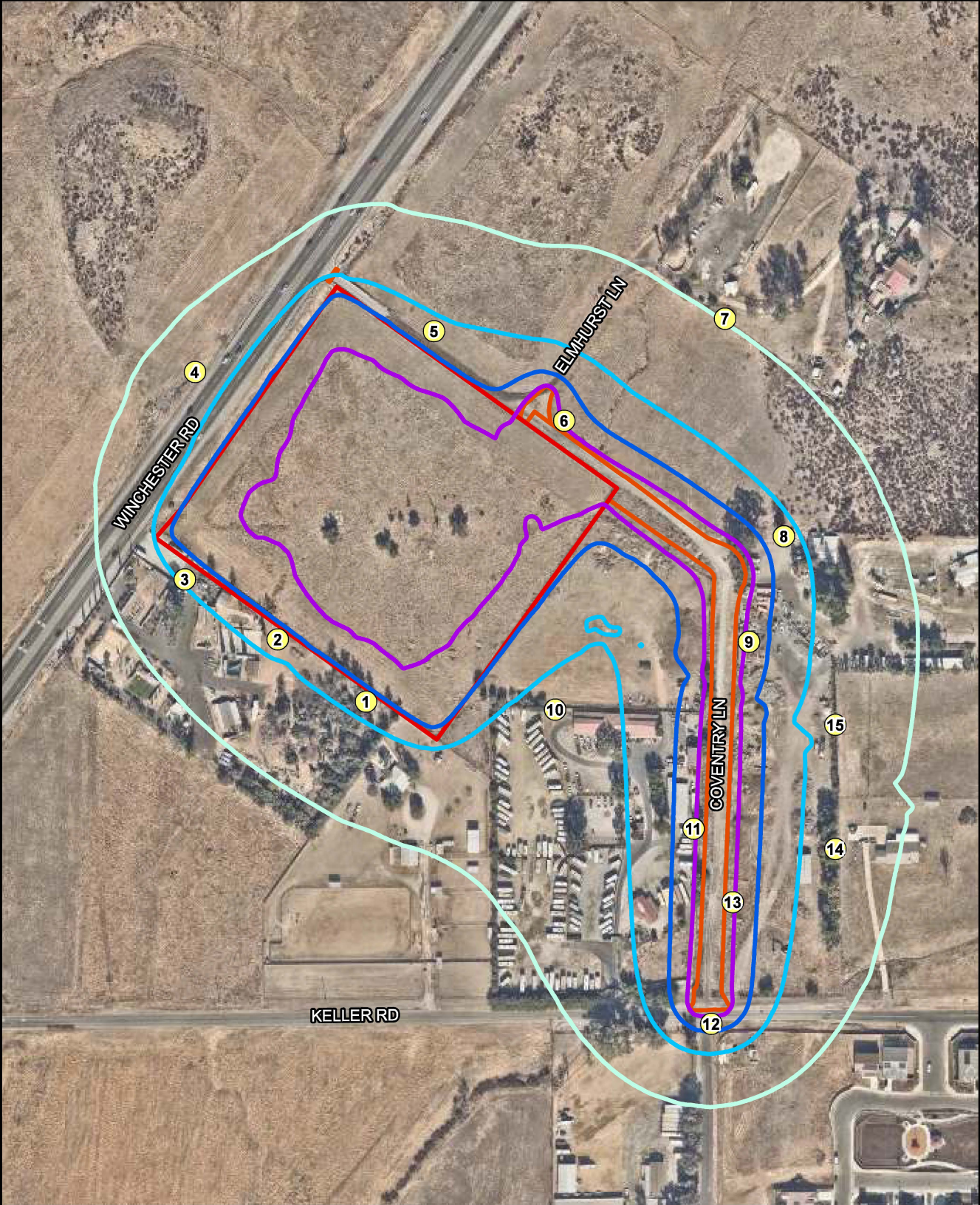
Table 10: County of Riverside Municipal Code Noise Level Limits

General Plan Land Use Designation	Noise Level Limit [dB(A) L _{eq}]	
	7:00 a.m. – 10:00 p.m.	10:00 p.m. – 7:00 a.m.
Rural Residential	45	45
Medium Density Residential	55	45
Commercial Retail	65	55
dB(A) L _{eq} = A-weighted decibels average noise level SOURCE: County of Riverside Municipal Code Section 9.52.040.		

Project construction activities would include grading, building construction, paving, and site roadway improvements to Coventry Lane and drainage improvements at the Coventry Lane and Keller Road intersection. Project construction noise would be generated by diesel engine-driven construction equipment used for site preparation and grading, building construction, loading, unloading, and placing materials and paving. Diesel engine-driven trucks would also bring materials to the project site and remove the soils from excavation. Noise associated with project construction would potentially result in short-term impacts to surrounding properties. Noise levels were modeled at a series of 10 receivers located at the adjacent properties. The results are summarized in Table 11. Modeled receiver locations and construction noise contours are shown in Figure 9.

Table 11: Construction Noise Levels

Receiver	Land Use	Construction Noise Level Limit [dB(A) L _{eq}]	Construction Noise Level [dB(A) L _{eq}]
1	Rural Residential	80	67
2	Rural Residential	80	67
3	Rural Residential	80	66
4	Commercial Retail	--	63
5	Rural Residential	80	67
6	Rural Residential	80	74
7	Rural Residential	80	60
8	Rural Residential	80	67
9	Rural Residential	80	74
10	Rural Residential	80	64
11	Rural Residential	80	74
12	Medium Density Residential	80	72
13	Rural Residential	80	76
14	Rural Residential	80	63
15	Rural Residential	80	63
dB(A) L _{eq} = A-weighted decibels equivalent noise level.			



- Project Boundary
- Off-site Improvements
- Receivers

Construction Noise Contours

- 60 dB(A) L_{eq}
- 65 dB(A) L_{eq}
- 70 dB(A) L_{eq}
- 75 dB(A) L_{eq}

0 Feet 300



FIGURE 9
Construction Noise Contours

As shown in Figure 9, construction noise levels are not anticipated to exceed the Federal Transit Administration's recommended threshold of 80 dB(A) L_{eq} outside of the project boundary. Noise levels at the adjacent residential uses would be 76 dB(A) L_{eq} or less. Construction activities would only occur during the times allowable by the Municipal Code (6:00 a.m. and 6:00 p.m. during the months of June through September, and between the hours of 7:00 a.m. and 6:00 p.m. during the months of October through May). No construction activities that generate impulsive noise levels would be required. Although the existing nearby residences would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary and would only occur during the daytime hours. Therefore, temporary increases in noise levels during construction would be less than significant.

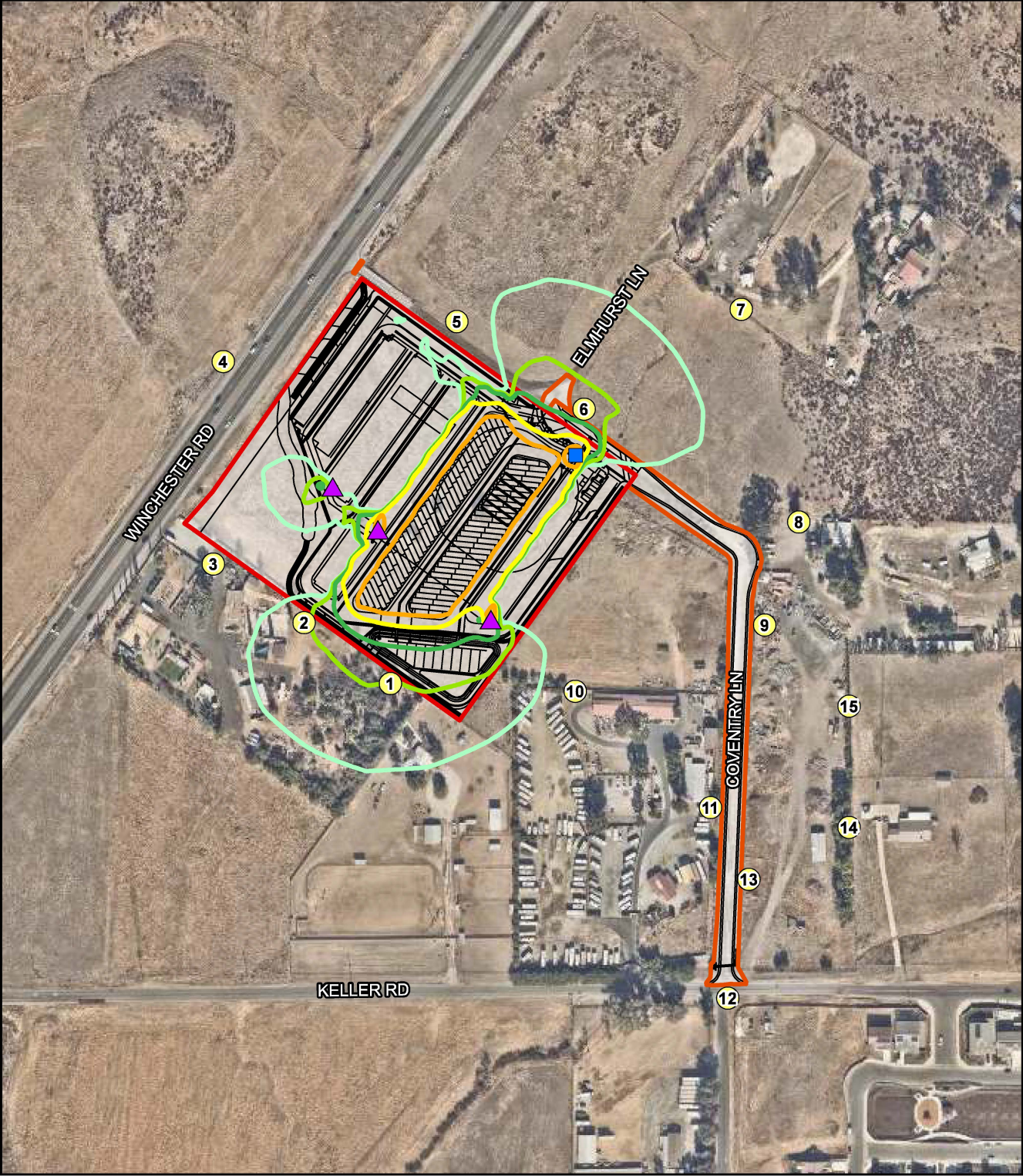
Operation

The operational noise sources on the project site are anticipated to be those that would be typical of any RV parking and self-storage facility. Based on similar operational uses, on-site operational noise sources associated with the project are anticipated to be RV parking, variable refrigerant flow units, and heating, ventilation, and air conditioning equipment units. Using the on-site noise source parameters, noise levels were modeled at a series of 10 receivers located at the adjacent properties. The results are summarized in Table 12. Figure 9 shows the operational noise contours along with the modeled receivers.

Table 12: Operational Noise Levels

Receiver	Land Use	Noise Level Limit Daytime/Nighttime [dB(A) L_{eq}]	Operational Noise Level [dB(A) L_{eq}]
1	Rural Residential	45/45	35
2	Rural Residential	45/45	34
3	Rural Residential	45/45	27
4	Commercial Retail	65/55	26
5	Rural Residential	45/45	28
6	Rural Residential	45/45	38
7	Rural Residential	45/45	27
8	Rural Residential	45/45	26
9	Rural Residential	45/45	25
10	Rural Residential	45/45	28
11	Rural Residential	45/45	24
12	Medium Density Residential	55/45	22
13	Rural Residential	45/45	23
14	Rural Residential	45/45	22
15	Rural Residential	45/45	23
dB(A) L_{eq} = A-weighted decibels equivalent noise level.			

As shown in Table 12, operational noise levels would range from 22 to 38 dB(A) L_{eq} at the adjacent uses. Project operation would not exceed the County's most restrictive noise level limit of 45 dB(A) L_{eq} , and operational noise impacts would be less than significant.



- Project Boundary
- Off-site Improvements
- HVAC
- ▲ VRF
- Receivers

Operational Noise Contours

- 30 dB(A) L_{eq}
- 35 dB(A) L_{eq}
- 40 dB(A) L_{eq}
- 45 dB(A) L_{eq}
- 50 dB(A) L_{eq}

0 Feet 300



FIGURE 10
Operational Noise Contours

Vehicle Traffic

The project was evaluated to determine if the addition of project-generated trips would result in a significant direct or cumulative increase in noise at nearby noise sensitive land uses. The project would increase traffic volumes on local roadways, specifically SR-79, Keller Road, and Coventry Lane. Noise level increases would be greatest nearest the project site, which would represent the greatest concentration of project-related traffic. Traffic noise is primarily a function of volume, vehicle mix, speed, and proximity. For purposes of this evaluation, the vehicle mix, speed, and proximity are assumed to remain constant. Thus, the primary factor affecting noise levels would be increased traffic volumes.

The Federal Interagency Committee on Noise guidance provides an established source of criteria to assess the impacts of substantial temporary or permanent increase in baseline ambient noise levels. Based on the Federal Interagency Committee criteria, the amount to which a given noise level increase is considered acceptable is reduced when the without project (baseline) noise levels are already shown to exceed certain land-use specific exterior noise level criteria. The specific levels are based on typical responses to noise level increases of 5 dB(A) or readily perceptible, 3 dB(A) or barely perceptible, and 1.5 dB(A) depending on the underlying without project noise levels for noise-sensitive uses. These levels of increases and their perceived acceptance are consistent with guidance provided by both the Federal Highway Administration and Caltrans.

Based on this guidance, long-term traffic noise that affects sensitive land uses would be considered substantial and constitute a significant noise impact if the project would:

- Increase noise levels by 5 dB or more where the no project noise level is less than 60 CNEL;
- Increase noise levels by 3 dB or more where the no project noise level is 60 CNEL to 65 CNEL; or
- Increase noise levels by 1.5 dB or more where the no project noise level is greater than 65 CNEL.

Based on the Traffic Circulation Assessment prepared for the project, the project would generate a total of 183 daily trips. Based on Caltrans traffic counts, the daily traffic volume on SR-79 in the vicinity of the project site is 26,000 average daily traffic (Appendix K). The addition of 183 project-related vehicle trips to SR-79 would result in a 0.1 dB increase in noise at 50 feet from SR-79, which would not be an audible increase in noise and would not exceed the threshold identified above. Keller Road has an existing traffic volume of 1,700 average daily traffic (Appendix K). The addition of 183 project-related vehicle trips to Keller Road would result in a noise increase of 0.5 dB which would not be an audible increase in noise and would not exceed the threshold identified above. No existing traffic volume data is available for Coventry Lane as it is a rural residential road. However, 183 project-related daily trips traveling at 25 miles per hour would generate a noise level of 46.2 community noise equivalent level at 50 feet which is considered compatible with all land use types and is typical of a rural road. Additionally, the existing noise environment is dominated by vehicle traffic on SR-79. Based on existing traffic volumes on SR-79, noise levels in the vicinity of Coventry Lane are approximately 64.6 CNEL. The addition of noise from vehicle traffic on Coventry Lane would not result in any measurable increase, and project-related traffic would not result in a significant increase in ambient noise levels. The project would result in noise level increases less than the thresholds identified above. Therefore, the project would not result in the exposure of noise sensitive land uses to significant noise levels, and impacts would be less than significant.

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

Less than Significant Impact. Short term construction related ground-borne vibration or ground borne noise levels occur during clearing, grading and construction and would likely be generated by heavy machinery and trucks. Increases in noise and vibrations would be localized to the immediate area and

are expected to be intermittent. The only pre-operational tasks occurring on site are the clearing of some trees and brush and spreading out the decomposed granite which is already on the project site. These impacts would be temporary and would cease once the site is operational. Pre-operational impacts are expected to be less than significant.

Once the project is operational, it is not expected to produce ground-borne vibration or groundborne noise levels. Operational uses are not expected to result in regular noise or vibrations as the project will be used as a long-term storage facility. During operations, the project's primary source of vibrations would be from RV parking. RV noise at the project site would include idling and air brake activity. Due to the rapid drop-off rate of ground-borne vibrations and the short duration of vehicular movement, traffic induced ground-borne vibrations are rarely perceptible beyond the roadway and rarely result in vibrations levels that would cause annoyance or damage to buildings in the vicinity. The impacts 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
PALEONTOLOGICAL RESOURCES Would the project:				
28. Paleontological Resources				
a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?	☐	☒	☐	☐

Source(s): Paleontological Resources Technical Report prepared by Paleo Services San Diego Natural History Museum (Appendix O)

Findings of Fact:

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

Less than Significant with Mitigation. As discussed in the Paleontological Resources Technical Report (Appendix O), the project site is mapped by the County as being within an undetermined paleontological sensitivity. However, based on the Preliminary Geotechnical Interpretive Report (Appendix I), early to middle Pleistocene-age very old axial-channel deposits are present across the upper 5 to 7 feet of the site, with Triassic-age phyllite located below these deposits. Early to middle Pleistocene-age very old axial-channel deposits are assigned a high paleontological sensitivity.

Construction earthwork is anticipated to include remedial grading for the creation of level building pads (estimated to extend 5 to 7 feet below ground surface (bgs) in areas where structures are proposed, and 3 to 5 feet in parking/driveway areas. Construction earthwork would occur in areas that are directly underlain by early to middle Pleistocene-age very old axial-channel deposits, which are assigned a high paleontological sensitivity. These deposits are in turn underlain at depths ranging from 5 to 7 feet bgs by phyllite of the Triassic-age "rocks of Menifee Valley," which is assigned an undetermined paleontological sensitivity. Due to the location of the grading, undiscovered fossils could be unearthed and damaged. Therefore, the project could result in significant impacts to paleontological resources. As a result, mitigation measures PAL-1 and PAL-2 would require implementation of a Paleontological Resource Impact Mitigation Program (PRIMP), in the form of paleontological monitoring, and submittal

of a Paleontological Monitoring Report. Implementation of mitigation measures PAL-1 and PAL-2, would reduce impacts to paleontological resources to a less than significant level.

Mitigation:

Mitigation Measure PAL-1: The following shall apply prior to the issuance of grading permits:

1. The applicant shall retain a qualified paleontologist approved by the County to create and implement a project-specific plan for monitoring site grading/earthmoving activities (project paleontologist).
2. The project paleontologist retained shall review the approved development plan and grading plan and conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the project paleontologist in a Paleontological Resource Impact Mitigation Program (PRIMP). This PRIMP shall be submitted for approval by the County Geologist prior to issuance of a Grading Permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standards and Society of Vertebrate Paleontology standards, are as follows:
 - a. A corresponding and active County Grading Permit (BGR) Number must be included in the title of the report. PRIMP reports submitted without a BGR number in the title will not be reviewed.
 - b. PRIMP must be accompanied by the final grading plan for the subject project.
 - c. Description of the proposed site and planned grading operations.
 - d. Description of the level of monitoring required for all earth-moving activities in the project area.
 - e. Identification and qualifications of the qualified paleontological monitor to be employed for grading operations monitoring.
 - f. Identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for recovery of large specimens.
 - g. 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.
 - h. Means and methods to be employed by the paleontological monitor to quickly salvage fossils as they are unearthed to avoid construction delays.
 - i. Sampling of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates.
 - j. Procedures and protocol for collecting and processing of samples and specimens.
 - k. Fossil identification and curation procedures to be employed.
 - l. Identification of the permanent repository to receive any recovered fossil material. Pursuant the County "SABER Policy", paleontological fossils found in the County should, by preference, be directed to the Western Science Center in the City of Hemet. A written agreement between the property owner/developer and the repository must be in place prior to site grading.
 - m. All pertinent exhibits, maps, and references.
 - n. Procedures for reporting of findings.
 - o. 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. The property owner and/or applicant on whose land the paleontological fossils are discovered shall provide appropriate funding for monitoring, reporting, delivery and curating the fossils at the institution where the fossils will be placed and will provide confirmation to the County that such funding has been paid to the institution. All reports shall be signed by the qualified paleontologist responsible for the report's content. All reports shall also be signed by all other parties responsible for the report's content (eg.

Professional Geologist), as necessary A signed electronic copy of the report, project plans, and all required review applications shall be uploaded to the County's PLUS Online System. Please use the following for this purpose:
https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/Filing_Instructions_Paleontological_Report_Review_Application.pdf
https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/PLUS_Online_Upload_Instructions_Paleontology.pdf
https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/Supplemental_Information_Form_PALEO.pdf Reports and/or review applications are not to be submitted directly to the County Geologist, Project Planner, Land Use Counter, Plan Check, or any other County office. Reports and/or review applications are not to be submitted directly to the County Geologist, Project Planner, Land Use Counter, Plan Check, or any other County office. 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. Safeguard Artifacts Being Excavated in Riverside County (SABER)

Mitigation Measure PAL-2: Prior to the final grading inspection, the applicant shall submit a Paleontological Monitoring Report prepared for site grading operations at this site. The report shall be certified by the professionally qualified Paleontologist responsible for the content of the report. This Paleontologist must be on the County's Paleontology Consultant List. The report shall include the findings made during all site grading activities and an appended itemized list of fossil specimens recovered during grading (if any) and proof of accession of fossil materials into the pre-approved museum repository. In addition, all appropriate fossil location information shall be submitted to the Western Center, the San Bernardino County Museum and Los Angeles County Museum of Natural History, at a minimum, for incorporation into their Regional Locality Inventories. A signed electronic copy of the report shall be uploaded to the County's PLUS Online System: (<https://planning.rctlma.org/sites/g/files/aldnop416/files/2023-06/PLUS%20Online%20Upload%20Instructions%20-%20Paleontology%20-%20Updated%20June%202023.pdf>). Reports and/or review applications are not to be submitted directly to the County Geologist, Project Planner, Land Use Counter, Plan Check, or any other County office.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
POPULATION AND HOUSING Would the project:				
29. Housing				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	☐	☐	☒	☐

Source(s): County of Riverside Map My County v11.9 Report for APN 472-110-038 (County of Riverside 2024a); County of Riverside General Plan 2021-2029 Housing Element (County of Riverside 2021b)

Findings of Fact:

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

Less than Significant Impact. Project operation would include three employees. It is anticipated that new employees at the project site would already reside within commuting distance and would not generate needs for any housing. Any employees relocating for project related employment would be accommodated by the existing vacant housing in the region. Thus, direct impacts related to unplanned population growth in an area would be less than significant.

The project would consist of off-site roadway improvements to Coventry Lane and drainage improvements at the Coventry Lane and Keller Road intersection. The off-site improvements would not extend roads or other infrastructure that could indirectly induce population growth. Therefore, both direct and indirect impacts related to population growth would be less than significant.

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

No Impact. The project site currently consists of vacant land. The project would consist of a general plan land use change from Rural Residential (RR) to Commercial Retail (CR) and a zone change from Rural Residential (R-R-2 ½) to General Commercial (C-1/C-P). As discussed in 2021-2029 Housing Element (County of Riverside 2021b), there are approximately 16,659 vacant units within the unincorporated County. Due to the ample amount of available housing, the project would not necessitate the construction of replacement housing. Therefore, there would be no impact to existing housing or the need for housing.

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

Less than Significant Impact. Project operation would include three employees. The employees that would fill these roles are anticipated to come from the region. It is anticipated that new employees at the project site would already reside within commuting distance and would not generate needs for any additional housing. In addition, should the project require employees to relocate to the area for work, there is sufficient vacant housing available within the region. As discussed above, there are approximately 16,659 vacant units within the unincorporated County. Thus, the project would not create a demand for any housing, including housing affordable to households earning 80 percent or less of the County's median income. Impacts 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
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): County of Riverside General Plan Safety Element (County of Riverside 2024b)

Findings of Fact:

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

Less than Significant Impact. The project site is located within 5.4 miles of two County Fire Stations, listed below:

- Riverside County Fire Department Station 83, located at 37500 Sky Canyon Drive, Murrieta, CA 92563, is 4.8 miles southwest of the project site.
- Riverside County Fire Station 34, located at 32655 Haddock Street, Winchester, CA 92596, is 5.4 miles north of the project site.

Implementation of the project would be required to adhere to the California Fire Code, as included in the County Ordinance No. 787, Fire Code and would be reviewed by the County's Department of Building and Safety to ensure that the project plans meet the fire protection requirements.

The three-employee increase that would occur from implementation of the project would result in a nominal increase in demand for fire protection and emergency medical services. In addition, there are two existing fire stations within 5.4 miles of the project site that currently serve the project vicinity; the closest station is just 4.8 miles from the project site. The increase in fire service demands from the project would not require construction of a new or physically altered fire station that could cause environmental impacts. Therefore, impacts related to fire protection services would be less than significant.

In addition, County Ordinance No. 659 sets forth policies, regulations, and fees related to the funding and construction of facilities necessary to address direct and cumulative environmental effects generated by new development. This includes imposing development impact fees for fire facilities for every acre of new industrial use. Overall, impacts related to fire services 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
31. Sheriff Services	☐	☐	☒	☐

Source(s): County of Riverside General Plan Safety Element (County of Riverside 2024b)

Findings of Fact:

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

Less than Significant Impact. The project site is located 5 miles northeast of the County Southwest Sheriff's Station (30755 Auld Road Murrieta, CA 92563), which currently serves the project region. The project would result in approximately three additional on-site employees and goods that could create the need for sheriff services. Crime and safety issues during project construction may include theft of building materials and construction equipment, malicious mischief, graffiti, and vandalism. Operation of the self-storage buildings may generate a typical range of sheriff service calls, such as burglaries, thefts, and employee disturbances. Pursuant to the County's existing permitting process, the Sheriff's Department would review and approve the site plans to ensure that crime prevention and emergency access measures are incorporated appropriately to provide a safe environment.

The need for law enforcement services from the project would not result in the need for new or physically altered sheriff facilities. Thus, impacts related to sheriff services would be less than significant.

In addition, County Ordinance No. 659 sets forth policies, regulations, and fees related to the funding and construction of facilities necessary to address direct and cumulative environmental effects generated by new development. This includes imposing development impact fees for sheriff facilities per every acre of new and industrial use. Overall, impacts 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
32. Schools	☐	☐	☒	☐

Findings of Fact:

- a) **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 school services?**

Less than Significant Impact. As described previously, the project is not anticipated to generate a new population, as the employees needed to operate the project are anticipated to come from within the project region. Additionally, pursuant to Government Code Section 65995 et seq., the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's impacts on school facilities in excess of fees set forth in the Government Code. These fees are collected by school districts at the time of issuance of building permits for development projects. Pursuant to Government Code Section 65995 applicants shall pay developer fees to the appropriate school districts at the time building permits are issued; and payment of the adopted fees provides full and complete mitigation of school impacts. As a result, impacts related to school facilities would be less than significant with the Government Code required fee payments.

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
33. Libraries	☐	☐	☒	☐

Findings of Fact:

- a) **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 library services?**

Less than Significant Impact. The project would develop a self-storage and RV storage facility that would not generate a substantial new population to utilize libraries. As described previously, the employees needed to operate the project are anticipated to come from the project region and commute to the project site; and a generation of substantial usage of library facilities is not anticipated to occur. Additionally, County Ordinance No. 659 sets forth policies, regulations, and fees related to the funding and construction of facilities necessary to address direct and cumulative environmental effects generated by new development. This includes imposing development impact fees for library facilities based on the acreage of new development, including commercial uses. Therefore, impacts 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
34. Health Services	☐	☐	☒	☐

Findings of Fact:

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

Less than Significant Impact. The project would develop and operate a self-storage and RV storage facility that would not generate a substantial new population requiring additional health services. As described previously, the employees needed to operate the project are anticipated to come from the project region and commute to the project site, and substantial in-migration of employees that could generate substantial need for health services is not anticipated to occur.

There could be a nominal increase in health service needs within the area during construction and operation. If services are needed, health service facilities are available near the project site. The Meniffee Global Medical Center, located at 28400 McCall Boulevard, Meniffee, CA 92585, is approximately 11.2 miles northwest of the project site. As the project employees likely would already reside in the project region, the project would create no substantial increase in medical needs, impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
RECREATION Would the project:				
35. 35. Parks and Recreation	☐	☐	☒	☐
a) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	☐	☐	☐	☒

Source(s): County Ordinance No. 460, Section 10.35 (Regulating the Division of Land – Park and Recreation Fees and Dedications); County of Riverside Map My County v11.9 Report for APN 472-110-038 (County of Riverside 2024a)

Findings of Fact:

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

Less than Significant Impact. The project would consist of a self-storage and RV storage facility and would not directly generate a substantial new population and thus would not require new park or recreational facilities. The project does not propose recreational facilities nor does the project require additional facilities as the three employees needed to operate the project are anticipated to come from the labor force in the surrounding area. Thus, the project would not generate a need for construction or expansion of recreational facilities. Impacts would be less than significant.

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?

Less than Significant Impact. As described previously, the project consists of a self-storage and RV storage facility and would not directly result in an influx of new residents. The three employees needed to operate the project are anticipated to come from the unemployed labor force in the region. Thus, the project would not generate an increase in residential use of the existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, impacts would be less than significant.

c) Would the project be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?

No Impact. The project site is located within CSA 152, which includes all unincorporated areas of Riverside County, Banning, Cat City, Corona, DHS, Indio, La Quinta, Moreno Valley, Murrieta, Norco, Palm Desert, Palm Springs, Rancho Mirage, Riverside City, and Coachella. The Quimby Act, Section 66477 of the California Government Code, allows the County to require parkland dedications to three acres per 1,000 residents. As previously discussed, the project would not generate any new residents, and the project would not include the development of any new recreational land. Thus, it would not affect any ratio of residents to recreational land required within the area. No associated Quimby fees would be applicable, and no impacts related to recreation would occur from implementation of the project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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) Would the project include the construction or expansion of a trail system?

Less than Significant Impact. As described previously, the project is not anticipated to result in an influx of new residents, as the employees needed to operate the proposed facility are anticipated to come from the labor force in the region. Thus, the project would not generate a substantial population increase that would use or require recreational trails, and impacts 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
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): Traffic Circulation Assessment prepared by Linscott, Law & Greenspan, Engineers (Appendix P); VMT Assessment prepared by Linscott, Law & Greenspan, Engineers (Appendix K)

Findings of Fact:

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

Less than Significant Impact. Access to the project site would be via one full-movement driveway along Elmhurst Lane, and one additional egress only onto Coventry Lane. The Traffic Circulation Assessment (Appendix P) calculated the project would generate 183 daily trips, with 12 trips (7 inbound, 5 outbound) produced in the AM peak hour and 19 trips (9 inbound, 10 outbound) produced in the PM peak hour on a "typical" weekday. Due to the limited increase in trips, the Traffic Circulation Assessment concluded that the project's traffic circulation impact would be less than significant. As a result, based on the project's forecast peak hour trip generation potential, the project would not significantly impact the surrounding transportation system.

The project does not include the construction or expansion of a bike system or bike lanes. As described previously, the project is not anticipated to result in an influx of new residents, as the three employees needed to operate the proposed facility are anticipated to come from the unemployed labor force in the region. Thus, the project would not generate a substantial population that would use or require a bike system or bike lanes, and impacts would be less than significant.

There are no bus stops located in the immediate vicinity of the project site. Construction of off-site improvements would not impact any existing or proposed transit facilities. Therefore, the operation of the project would not conflict with a program plan, ordinance or policy addressing the performance of active transportation, and impacts would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less than Significant Impact. SB 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research to amend the State CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating Transportation impacts. SB 743 specified that the new criteria should promote the reduction of GHG emissions, the development of multimodal transportation networks and a diversity of land uses. The bill also specified that delay-based LOS could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3 was added to the State CEQA Guidelines beginning January 1, 2019. Section 15064.3–Determining the Significance of Transportation Impacts states that VMT is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020.

The County has developed a SB 743 VMT Impact Screening Criteria to serve as a screening tool for potential VMT impacts associated with select land use projects in the unincorporated area of Riverside County. As such, the following guidance summarizes the potential project screening and would be presumed to cause less than significant impact, as shown in Figure 3 of the County of Riverside Transportation Analysis Guidelines for LOS and VMT:

1. Small projects, which include, but are not limited to, projects that generate less than 110 average daily trips and Warehouse (unrefrigerated) buildings with area less than or equal to 208,000 square feet.
2. Projects Near High Quality Transit, which includes projects within a half mile of an existing major transit stop and maintains a service frequency interval of 15 minutes or less during the morning and evening peak commute periods.
3. Local Serving Retail, which includes projects with no single store on-site, exceeds 50,000 square feet and the project is local serving as determined by the Transportation Department.
4. Affordable Housing, which includes projects with a high percentage of affordable housing as determined by the County Planning and Transportation Departments.
5. Local Essential Services, which includes projects with a high percentage of affordable housing as determined by the County Planning and Transportation Departments.
6. Map Based Screening, which includes projects within areas of development that are under the threshold as shown on the screening map as allowed by the Transportation Department.
7. Redevelopment projects, which include projects that replace an existing VMT generating land use and do not result in a net overall increase in VMT.

The project, which consists of a 113,915-square-foot self-storage (mini-warehouse) use, would screen out under the “Small Projects” criteria based on the “Warehouse (unrefrigerated) buildings with area less than or equal to 208,000 square feet” threshold contained in Figure 3 of the *County of Riverside Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled*. As a result, impacts would be less than significant.

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

No Impact. The project includes construction and operation of a self-storage and RV storage facility. There are no proposed uses that would be incompatible. The project would also not increase any hazards related to a design feature. Access to the project site would be provided via one ingress/egress driveway and one egress only driveway along Coventry Lane. Internal driveways would be constructed to allow for vehicular access throughout. The on-site circulation design prepared for the project provides fire truck accessibility and turning ability throughout the site. Thus, the project would not result in increased vehicular hazards. No impact would occur.

d) Would the project cause an effect upon, or a need for new or altered maintenance of roads?

Less than Significant Impact. The project would not result in the altered need for road maintenance; however, as described above, the project would generate 190 new daily trips, which would contribute to the need for regular maintenance of roads. The project would include off-site improvements to Coventry Lane that would consist of paving a 24-foot-wide roadway with 4-foot graded shoulders to connect to Keller Road. Further, in accordance with Caltrans standards and requirements, the project would install an off-site barricade with reflective signage to close access to Elmhurst Lane and Coventry Lane from Winchester Road/SR-79. In addition, the property taxes and revenue generated from the proposed uses on the project site would support regular road maintenance. Thus, the project would not require the need for new or altered maintenance of roads and impacts would be less than significant.

e) Would the project cause an effect upon circulation during the project’s construction?

Less than Significant. Construction activities from the project would generate vehicular trips from construction workers traveling to and from the project site, delivery of construction supplies and import materials to, and export of debris from the project site. The increase of trips during construction activities would be limited and are not anticipated to exceed the number of operational trips, which (as detailed previously) would not result in a significant impact related to traffic. Construction activities would be required to ensure emergency access in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), which would be ensured through the County’s permitting process. Therefore, the short-term vehicle trips from construction of the project would be less than significant.

f) Would the project result in inadequate emergency access or access to nearby uses?

No Impact

Construction

Project construction, including equipment and supply staging and storage, would occur within the project site and would not restrict access of emergency vehicles to the project site or adjacent areas. Thus, impacts related to inadequate emergency access during construction activities would not occur.

Operation

Operation of the project would not result in inadequate emergency access or access to nearby uses. Direct access to the project site would be provided via Elmhurst Lane. The project would also be required to design and construct internal access and provide fire suppression facilities (e.g., hydrants and sprinklers) in conformance with County Ordinances and the County Fire Department would review the development plans prior to approval to ensure adequate emergency access pursuant to the requirements in the International Fire Code and Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). As a result, the project would not result in inadequate emergency access or access to nearby uses. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
38. Bike Trails				
a) Include the construction or expansion of a bike system or bike lanes?	☐	☐	☒	☐

Findings of Fact:

a) Would the project include the construction or expansion of a bike system or bike lanes?

Less than Significant Impact. The project consists of a self-storage and RV storage facility and does not include the construction or expansion of a bike system or bike lanes. As described previously, the project is not anticipated to result in an influx of new residents, as the three employees needed to operate the proposed facility are anticipated to come from the unemployed labor force in the region. Thus, the project would not generate a substantial population that would use or require a bike system or bike lanes, and impacts 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
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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)?

☐	☒	☐	☐
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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.)

☐	☒	☐	☐
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Source(s): County Archaeologist; AB 52 Tribal Consultation

Findings of Fact:

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)?

As previously described under Section 8.a, one previously recorded resource, a barn (P-33-007802), was identified within the project boundaries. Based on the Phase I Cultural Resources Assessment (Appendix G), the barn is not listed in, or eligible for listing in, the California Register of Historical Resources, nor is it listed in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). The resource was evaluated and determined not to be significant under CEQA or County significance criteria.

The project APE has been subject to extensive prior disturbance, including structure development, pad grading, grading associated with the construction of Winchester Road/SR-79, dirt and improved roads, channelization of a watercourse, installation of stormwater features, agricultural ground-disturbing activities, periodic discing, vegetation mowing, and the presence of mixed surface debris. Due to these prior disturbances, the potential for intact, significant prehistoric or historic cultural resources to be present within the project APE is considered low.

Although no historical resources listed or eligible for listing in the California Register or a local register have been identified, there remains a possibility that previously unknown archaeological resources or human remains could be discovered during grading or construction activities. Such discoveries could constitute a significant impact if not properly managed. Implementation of mitigation measures CUL-1 through CUL-6 would ensure that any unanticipated discoveries are appropriately treated, reducing potential impacts to historical and archaeological resources to a less than significant level.

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.)

In compliance with SB 18, on October 28, 2021, the County requested a Sacred Lands File search and a list of tribes whose historical extent includes the project area from the Native American Heritage Commission. Based on the list provided by the Native American Heritage Commission on December 14, 2021, project notices were sent on December 15, 2021, to all Native American Tribal representatives identified on the list.

In compliance with AB 52, notices regarding the project were mailed to all requesting tribes on October 27, 2021. Requests for consultation were requested by the Pechanga Band of Indians (Pechanga), the Soboba Band of Luiseno Indians (Soboba), the Rincon Band of Luiseno Indians (Rincon), and the Agua Caliente Band of Cahuilla Indians (Agua Caliente). No responses were received from the Santa Rosa Band of Cahuilla Indians, the Ramona Band of Cahuilla, the Cahuilla Band of Indians, the Pala Band of Mission Indians, or the Colorado River Indian Tribes. The Quechan Indian Nation responded in an email dated November 01, 2021, and deferred consultation to tribes located closer to the project area.

Pechanga requested consultation in an email dated November 05, 2021. In the correspondence, Pechanga stated that project is within their Traditional Use Area and requested that all efforts to preserve sensitive Tribal Cultural Resources be made as early in the development process as possible. Project documents were provided to the tribe on October 23, 2023. Pechanga determined that the area is sensitive to the tribe, there are village sites and resources in the vicinity, and that they have concerns regarding any previously unidentified subsurface resources that may be present.

Soboba requested consultation in an emailed letter dated February 10, 2022, stating that the project area is considered sensitive due to the presence of known sites in the surrounding area. Project documents were provided to Soboba on October 23, 2023. The project was discussed during meetings held on January 16, 2024, and February 14, 2024. Soboba expressed concerns regarding potential subsurface resources that could be unearthed during grading activities and requested the presence of a Tribal monitor during ground-disturbing activities. Consultation with Soboba was concluded on April 3, 2024.

Agua Caliente requested consultation in an emailed letter dated December 1, 2021. The Tribe stated that while the project area is not located within the boundaries of the Agua Caliente Reservation, it is within the Tribe's Traditional Use Area. Project documents were provided to Agua Caliente on October 23, 2023, and January 30, 2024. Consultation was concluded on February 7, 2024.

Rincon requested consultation in an emailed letter dated December 9, 2021, stating that the project is located within their Traditional Use Area and that Rincon is culturally and traditionally affiliated with the project area. Project documents were provided to Rincon on October 23, 2023, and January 15, 2024. Rincon concluded consultation in an emailed letter dated January 29, 2024.

In conclusion, all consulting tribes recommended that a Native American monitor be present during ground disturbing activities. Implementation of mitigation measures CUL-1 through CUL-6 would ensure that any unanticipated discoveries are appropriately treated, reducing potential impacts to tribal cultural resources to a less than significant level.

Mitigation: See mitigation measures CUL-1 through CUL-6 as outlined in Section 8, above.

Monitoring: Construction monitoring by Archaeological Monitor(s) and Native American Monitor(s) during all initial ground disturbing activities and excavation of soils in each portion of the project site including clearing, grubbing, tree removals, grading, and trenching.

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

Source(s): Onsite Wastewater Treatment System (OWTS) Report prepared by Earth Strata Geotechnical Services (Appendix J); Eastern Municipal Water District Will Serve Letter (Appendix A)

Findings of Fact:

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

Less than Significant Impact.

Water Infrastructure

As stated in the EMWD Will Serve Letter (Appendix A), EMWD will provide water services to the project site. The demand for water at a self-storage and RV storage facility would primarily be for an office and restroom and would be minimal. Therefore, there would be no additional environmental effects associated with well construction or operation and impacts would be less than significant.

Sewer

The project would construct a septic system that would include a leach field located beneath the RV storage area on the northeastern portion of the project site. The California Plumbing Code requires a minimum sewage flow rate of 20 gallons per day per employee for offices. Since the project would consist of three employees, the project's maximum estimated effluent rate would be 60 gallons per day. As described in the OWTS Report (Appendix J), the proposed septic system would be designed to accommodate a maximum design flow of 1,000 gallons per day. Therefore, the proposed septic system would be able to accommodate the project's projected sewage flow. Because all wastewater would be treated on-site, the project would not require capacity from a wastewater treatment provider or require or result in the relocation or expansion of off-site sewer lines. Therefore, no impacts related to existing off-site wastewater infrastructure would occur. Additionally, the proposed on-site septic system is included as part of the construction of the project and would not result in any physical environmental effects beyond those identified in other sections of this document. Therefore, the project would result in less than significant impacts related to wastewater infrastructure.

Stormwater Drainage

As detailed previously, runoff generated by the project would be conveyed to a detention/bioretenion basin located at the southeast corner of the project site which would treat 100 percent of site runoff and any offsite runoff. Thus, the project would not require or result in the relocation or construction of new or expanded off-site drainage systems. The proposed on-site stormwater drainage infrastructure is included as part of the construction of the project and would not result in any physical environmental effects beyond those identified in other sections of this document. Therefore, impacts related to drainage infrastructure would be less than significant.

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

Less than Significant Impact. As stated in the EMWD Will Serve Letter (Appendix A), EMWD would provide water services to the project site. Thus, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development, and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
41. Sewer				
a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?	☐	☐	☒	☐
b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒

Source(s): Onsite Wastewater Treatment System (OWTS) Report prepared by Earth Strata Geotechnical Services (Appendix J)

Findings of Fact:

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?

Less than Significant Impact. The project would construct a septic system that would include a leach field located beneath the RV storage area on the northeastern portion of the project site. Riverside County requires a construction permit for the installation of a new septic system through the Department of Environmental Health. The County would review and approve required permits prior to construction of the project. Additionally, the proposed on-site septic system is included as part of the construction of the project and would not result in any physical environmental effects beyond those identified in other sections of this document. Therefore, impacts related to wastewater infrastructure would be less than significant.

- b) **Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

No Impact. As described previously, all wastewater would be treated on-site, the project would not require capacity from a wastewater treatment provider or require or result in the relocation or expansion of off-site sewer lines. Therefore, the project would not result in impacts related to wastewater treatment capacity. No impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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): California Department of Resources Recycling and Recovery 2024

Findings of Fact:

- 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?**

Less than Significant Impact. The closest landfill to the project site that is permitted to operate into the future is the El Sobrante Sanitary Landfill, which is located at 10910 Dawson Canyon Road in Corona and is approximately 32.6 miles northwest of the project site. The El Sobrante Landfill has a remaining capacity of 121,083,583 tons and is expected to have capacity until January 1, 2051 (California Department of Resources Recycling and Recovery 2025).

The project would result in 107 tons of solid waste per year (0.29 ton per day; Attachment 1 in Appendix D), which would be below the remaining capacity for the El Sobrante Landfill. Therefore, the project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, and impacts would be less than significant.

- 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)?**

Less than Significant Impact. The project would comply with all regulations related to solid waste. All construction would be required to divert 65 percent of construction waste and operations of development would be required to divert 75 percent of solid waste pursuant to state regulations. Implementation of the project would be required to be consistent with all mandatory federal, state and County regulations related to solid waste. All projects in the County undergo development review prior

to permit approval, which includes an analysis of project compliance with these regulations as well as the CIWMP. Therefore, impacts 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): Road Standards and Standard Specifications (County of Riverside 2023b)

Findings of Fact:

a–f) 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–c) Electricity, Natural Gas, and Communications Systems

Less than Significant Impact. The project would connect into the existing utility grid. Electrical, gas, and telecommunication lines already exist surrounding the project site. The project would be required to comply with the conditions of the service provider terms and connection specifications prior to service connections. Therefore, the project would not result in the construction of new electrical, natural gas, or communication systems that would cause significant environmental effects, and impacts would be less than significant.

d) Street Lighting

Less than Significant Impact. Development of the project would provide street lighting, parking lot lighting, and other outdoor lighting including security and site lighting. The project would be required to adhere to County No. Ordinance 915 (Outdoor Lighting), which was Lighting would be designed in accordance with the County's Road Standards and Standard Specifications (County of Riverside 2023b). Impacts associated with the construction and installation of streetscape electrical infrastructure (i.e., lighting) are an inherent part of the project's construction process, and the environmental effects associated with the project's construction phase have been evaluated throughout this Initial Study. Therefore, the project would not result in the construction of new street lighting that would cause significant environmental effects and impacts would be less than significant.

e) Maintenance of Public Facilities (Roads)

Less than Significant Impact. The project would include off-site improvements to Coventry Lane that would consist of paving a 24-foot-wide roadway with 4-foot graded shoulders to connect to Keller Road. Off-site improvements would also consist of updating the storm drain connection at the Coventry Lane and Keller Road intersection to include an intermediate catch basin to collect and manage stormwater runoff that would then discharge west out of a new headwall. Further, in accordance with Caltrans standards and requirements, the project would install an off-site barricade with reflective signage to close access to Elmhurst Lane and Coventry Lane from Winchester Road/SR-79. Construction staging would take place on the project site. The impacts of the construction of these off-site roadway improvements have been assessed throughout this Initial Study and any necessary mitigation would be implemented to reduce environmental impacts to less than significant. Therefore, the construction and maintenance of roadways would not cause significant environmental effects, and impacts would be less than significant.

f) Other Governmental Services

Less than Significant Impact. The project would construct a septic system that would include a leach field located beneath the RV storage area on the northeastern portion of the project site. Impacts related to the construction of the septic system have been assessed throughout this Initial Study. Therefore, the construction of these facilities would not cause significant environmental effects, and impacts 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
WILDFIRE If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:				
44. Wildfire Impacts	☐	☐	☒	☐
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Source(s): County of Riverside General Plan Safety Element Figure 6 “Fire Hazard Severity Zones” (County of Riverside 2024b); County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan (County of Riverside 2023a); County of Riverside Map My County v11.9 Report for APN 472-110-038 (County of Riverside 2024a); Emergency Operations Plan (EOP) for the Riverside County Operational Area (County of Riverside 2019b); California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zones Mapping (CAL FIRE 2024); Wildland Fire Protection Plan prepared by Santa Margarita Fire Consulting, LLC. (Appendix Q)

Findings of Fact:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The County EOP addresses wildfire as one of the most common hazard incidents faced by the Riverside County. As determined in the Wildland Fire Protection Plan (Appendix Q), the General Plan Safety Element Figure 6 (County of Riverside 2024b) and the CAL FIRE FHSZs Mapping (CAL FIRE 2024), the project site is in a Very High Fire Hazard Zone (VHFHZ). Access to the project site would be provided via one ingress/egress driveway and one egress only driveway along Coventry Lane. As part of the project, Coventry Lane will be converted from a dirt access road to a paved road. Internal driveways would be 24 feet wide with an approved paved surface to provide all-weather driving capabilities meeting the 80,000-pounds-per-square-inch requirement. In the event of a wildfire emergency requiring evacuation and emergency vehicle access, the Riverside County Sheriff’s Department would establish evacuation routes (County of Riverside 2019b). Construction of the project would not result in impacts to the use of the local roadways from the movement of construction vehicles and trucks, including Coventry Lane and SR-79.

Consistent with Ordinance 726, the project would be required to prepare and implement a Transportation Demand Management (TDM) to address temporary detours or blockages on local roadways during construction. Implementation of the TDM would reduce congestion and confusion on local roads during construction and would ensure that emergency response/evacuation plans are not thwarted due to construction activities. Additionally, the County Department of Building and Safety and the County Fire Department enforce fire standards as they review building plans and conduct building inspections. This includes a review for compliance with County Ordinance Number 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. Therefore, the project would not impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less than Significant Impact. The project site is relatively flat and does not contain any hills or steep slopes. In addition, the project would be required to comply with California Fire Code Chapter 47 and the County Ordinance No. 787, which provides requirements to reduce the potential of fires that include vegetation management, construction materials and methods, installation of automatic sprinkler systems, and fire flows (the quantity of water available for fire protection purposes). Compliance with these requirements would be verified by the County prior to approving building permits for the project. Overall, the project would not exacerbate wildfire risks, and impacts would be less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less than Significant Impact. The project would include 24-foot-wide fire lanes throughout the project site and construct six fire hydrants. Project design features, as described in the project description and the Wildland Fire Protection Plan (Appendix Q), would reduce fire risk through perimeter fencing, FMZs, and fire resistant construction materials. Additionally, the project includes off-site improvements to connect Coventry Lane to Elmhurst Lane and convert a portion of Coventry Lane from a dirt road to a paved road. The environmental impacts associated with installation of the project's fire design and construction of these new roadways have been evaluated throughout this Initial Study as part of the grading and development of the site. Therefore, project design and infrastructure would ensure the project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment and impacts would be less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. Although the project site is within a VHFHZ, it is not located proximally to a flood zone, nor does the project site convey flood flows or contain steep slopes. As described in the Preliminary Geotechnical Interpretive Report (Appendix I), geologic reconnaissance and review of aerial photographs show the project site is not underlain by landslides or unstable natural slopes. If a fire were to occur in the VHFHZ, the project site would not be affected by downstream or downslope flooding or landslides as a result of runoff associated with post-fire slope stability or drainage changes. No impact would occur.

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

Less than Significant Impact. As described previously, the project site is located within the VHFHZ, and the project would be required to comply with California Fire Code and the County Ordinance No. 787, Fire Code, which provides requirements to reduce the potential of fires that include vegetation management, construction materials and methods, installation of automatic sprinkler systems, and provision of fire flows. Project design features, as described in the project description and the Wildland Fire Protection Plan (Appendix Q), would reduce fire risk through perimeter fencing, FMZs, and fire resistant construction materials. Additionally, the project includes off-site improvements to connect Coventry Lane to Elmhurst Lane and convert a portion of Coventry Lane from a dirt road to a paved road. Therefore, the design of the project in addition to compliance with state and County fire regulations, would result in less than significant impacts related to wildland fire hazards.

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
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?	☐	☒	☐	☐

Findings of Fact:

- a) **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?**

Less than Significant with Mitigation Incorporated. As discussed under Section 7, Biological Resources, mitigation measure BIO-1 requires that permanent impacts to 0.003 acre of RWQCB non-wetland WOTS, 0.006 acre of CDFW streambed, and 0.012 acre of CDFW associated streambed be compensated at a 1.5:1 ratio through on-site restoration by expanding the drainage on the southwestern portion of the project site and having the land be conserved in perpetuity prior to the start of construction. In addition, mitigation measure BIO-2 would require the project proponent to coordinate with the RWQCB to obtain a Water Quality Certification pursuant to Section 401 of the CWA prior to the commencement of construction activities. Mitigation measure BIO-2 would also require the project proponent to coordinate with the CDFW to obtain a Streambed Alteration Agreement. Mitigation measure BIO-3 would require a burrowing owl preconstruction survey due to the presence of suitable habitat in the form of nonnative grassland. Implementation of mitigation measure BIO-4 would require a preconstruction nesting bird survey if vegetation is to be removed during the nesting season (February 1 through August 31). Further, the project would be required to pay MSHCP fees pursuant to County Ordinance No. 810 and SKR mitigation fees pursuant to County Ordinance No. 663.

As described under Section 8, Cultural Resources, the possibility of buried intact significant prehistoric or historic cultural resources being present within the project site is considered low. However, the County anticipates that the local consulting Tribe(s) will request construction monitoring during the AB 52 consultation. Implementation of mitigation measures CUL-1 through CUL-6 would reduce impacts related to historical and archaeological resources to a less than significant level.

As described under Section 28, Paleontological Resources, construction earthwork is anticipated to include remedial grading for the creation of level building pads (estimated to extend 5 to 7 feet bgs) in areas where structures are proposed, and 3 to 5 feet in parking/driveway areas. Construction earthwork would occur in areas that are directly underlain by early to middle Pleistocene-age very old axial-channel deposits, which are assigned a high paleontological sensitivity. These deposits are in turn underlain at depths ranging from 5 to 7 feet bgs by phyllite of the Triassic-age "rocks of Meniffee Valley," which is assigned an undetermined paleontological sensitivity. Therefore, the project could result in significant impacts to paleontological resources. As a result, Mitigation Measures PAL-1 and PAL-2 would require implementation of a PRIMP, in the form of paleontological monitoring, and submittal of a Paleontological

Monitoring Report. The implementation of mitigation measures PAL-1 and PAL-2 would reduce impacts to paleontological resources to a less than significant level.

Therefore, with implementation of mitigation and compliance with the MSHCP, the project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) 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)?	☐	☐	☒	☐

Findings of Fact:

b) Would the project 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)?

Less than Significant Impact. The project consists of a self-storage and RV storage facility. As described above, all the potential impacts related to implementation of the project would be less than significant or reduced to a less than significant level with implementation of mitigation measures that are imposed by the County.

The project would consist of a general plan land use change from Rural Residential (RR) to Commercial Retail (CR) to allow for a self-storage and RV storage facility. The project would also include a zone change from Rural Residential (R-R-2 ½) to General Commercial (C-1/C-P). The project site also includes a Community Development Overlay (CDO) which allows for community development land use designations to be applied through General Plan Amendments within specified areas within Rural, Rural Community, Agriculture, or Open Space Foundation Component areas. The project would develop and operate a self-storage and RV storage facility which is consistent with the Community Development Overlay (CDO). The cumulative effect of the project taken into consideration with other development projects in the area would be limited, because the project would develop the site in consistency with the Commercial Development Overlay (CDO) and would not result in substantial effects to any environmental resource topic, as described throughout this document.

To provide for public facility maintenance needs, County Ordinance No. 659 sets forth policies, regulations, and fees related to the funding and construction of facilities necessary to address direct and cumulative environmental effects generated by new development. This includes fees for road improvements and traffic signal improvements, which are levied per every acre of new commercial use. In addition, the taxes generated from the proposed uses on the project site would support regular road maintenance. Thus, the project would provide funding for future roadway maintenance needs, and impacts would not occur. In addition, the project meets the County's VMT screening criteria for small projects. Therefore, the project would have a less than significant cumulative impact related to VMT. Therefore, cumulatively considerable transportation related impacts would be less than significant.

Overall, impacts to environmental resources or issue areas would not be cumulatively considerable; and cumulative impacts would be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Findings of Fact:

c) Would the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact. The project would not consist of any use or activities that would result in a substantial negative effect on persons in the vicinity. All resource topics associated with the project have been analyzed in accordance with CEQA and the State CEQA Guidelines and were found to pose no impacts or less than significant impacts with implementation of mitigation measures and existing plans, programs, or policies that are required by the County. Consequently, the project would not result in environmental effects that would cause substantial adverse effects on human beings directly or indirectly, and impacts would be less than significant.

VI. EARLIER ANALYSES

Earlier analyses may be used where, pursuant to the tiering, program Environmental Impact Report, or other CEQA process, an effect has been adequately analyzed in an earlier Environmental Impact Report 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: N/A

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

Revised: 4/28/2026 10:33 AM
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VII. MITIGATION MEASURES

Biological Resources

Mitigation Measure BIO-1: To compensate for the permanent loss of 0.003 acre of Regional Water Quality Control Board non-wetland waters of the State, 0.006 acre of California Department of Fish and Wildlife streambed/Multiple Species Habitat Conservation Plan Riverine, and 0.012 acre of California Department of Fish and Wildlife associated riparian/Multiple Species Habitat Conservation Plan Riparian, the project shall mitigate on-site. Jurisdictional areas that are permanently impacted by construction activities shall be compensated at a 1.5:1 ratio through the creation of additional jurisdictional aquatic resources and riparian vegetation within the unnamed jurisdictional drainage feature present within Assessor's Parcel Number 472-110-038. The unnamed drainage feature located on Assessor's Parcel Number 472-110-038 shall be conserved in perpetuity prior to the start of construction. Exact requirements shall be finalized during the permitting process.

Implementation of an on-site Habitat Mitigation Monitoring Plan shall be prepared and shall include an implementation plan, site preparation, seed and plant material, installation methods, maintenance methods, performance standards, maintenance and monitoring success criteria, and reporting measures. The Habitat Mitigation Monitoring Plan shall be reviewed and approved by the Regional Conservation Authority and the Wildlife and Regulatory Agencies prior to any ground-disturbing activities. The percent cover for on-site mitigation will be based on the percent of native cover prior to construction. The mitigation area shall be maintained until performance standards are achieved, which is anticipated to be approximately five years. The mitigation area shall be fenced and conserved in perpetuity prior to the start of construction. A Long-Term Management Plan shall be prepared and shall include specific measures to address long-term conservation of the mitigation area including monitoring, management, and protection measures. The Long-Term Management Plan shall be reviewed and approved by the Regional Conservation Authority and the Wildlife and Regulatory Agencies.

Mitigation Measure BIO-2: Prior to commencement of construction activities, the project proponent shall coordinate with the Regional Water Quality Control Board to obtain a Water Quality Certification pursuant to Section 401 of the Clean Water Act. Furthermore, the project proponent shall coordinate with the CDFW to obtain a Streambed Alteration Agreement.

Mitigation Measure BIO-3: A pre-construction burrowing owl survey in accordance with the Multiple Species Habitat Conservation Plan shall be required within 30 days prior to ground disturbance to ensure no burrowing owls have entered the project site and to avoid direct take of burrowing owls, if present. The survey shall include all areas where suitable habitat is present within the project boundary. Additionally, if burrowing owls have colonized the project site prior to the initiation of construction, the project proponent shall immediately inform the California Department of Fish and Wildlife and the Western Riverside County Regional Conservation Authority. Approval of a Burrowing Owl Protection and Relocation Plan by the California Department of Fish and Wildlife prior to initiating ground disturbance would be required. Translocation of any owls present on-site would be required to occur within the non-breeding season. With implementation of the 30-day preconstruction survey and the Burrowing Owl Protection and Relocation Plan, if warranted, impacts to burrowing owl, including possible take of active nests, would be avoided.

Mitigation Measure BIO-4: To remain in compliance with the Migratory Bird Treaty Act and California Fish and Game Code 3503, 3503.5, and 3513, no direct impacts shall occur to any nesting birds, their eggs, chicks, or nests. If vegetation removal activities were to occur during the bird breeding season of February 1 to August 31, a qualified biologist shall conduct a pre-construction nesting bird survey. The pre-construction nesting bird survey shall be conducted by a biologist who holds a current Memorandum of Understanding with the County of Riverside. If nesting activity is observed, appropriate avoidance measures shall be adopted to avoid any potential impacts to nesting birds. The nesting bird survey must

be completed no more than three days prior to any ground disturbance. If ground disturbance does not begin within three days of the survey date, a second survey shall be conducted. If nesting birds are discovered within the project site, the project's biologist shall mark a buffer around the nest. At a minimum, construction activities will stay outside of a 300-foot buffer around the active nests. For raptor species, the buffer is to be expanded to 500 feet. The approved buffer zone shall be marked in the field with construction fencing, and no vegetation clearing or ground disturbance shall commence until the qualified biologist and Riverside County Environmental Programs Division (EPD) of the Planning Department verify that the nests are no longer occupied and/or the juvenile birds can survive independently from the nests. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, normal construction activities may occur within the buffer. The project's biologist shall monitor the active nest during construction activity to ensure no disturbance to the birds are occurring, and shall have the authority to halt ground-disturbing activities if they are impacting the nesting birds. Prior to issuance of a permit for grading, including permits for clearing, grubbing, and/or stockpiling, the project's consulting biologist shall prepare and submit a report, documenting the results of the survey to EPD for review. The pre-construction survey shall cover the project site and any off-site improvements. In some cases, EPD may also require a Monitoring and Avoidance Plan prior to the issuance of a rough grading permit.

Cultural Resources

Mitigation Measure CUL-1: 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.

Mitigation Measure CUL-2: The developer/permit holder or any successor in interest shall comply with the following for the life of this permit. If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed:

All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis. Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

*A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other.

**If not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

Mitigation Measure CUL-3: Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

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

Mitigation Measure CUL-4: Prior to the 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 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.

Mitigation Measure CUL-5: Prior to the Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigation(s) and/or Phase III data recovery.

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

Prehistoric Resources – One of the following treatments shall be applied:

- a. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloguing, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.
- b. If reburial is not agreed upon by the Consulting Tribes, then the resources shall be curated in a culturally appropriate manner at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing of sacred items, burial goods and Native American human remains.

Mitigation Measure CUL-6: Prior to Grading Permit Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigation Standard Scopes of Work posted on the Riverside County Transportation and Land Management Agency (TLMA) website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the pre-grade meeting and evidence that artifacts have been treated in accordance to procedures stipulated in the Cultural Resources Management Plan.

Paleontological Resources

Mitigation Measure PAL-1: The following shall apply prior to the issuance of grading permits:

1. The applicant shall retain a qualified paleontologist approved by the County to create and implement a project-specific plan for monitoring site grading/earthmoving activities (project paleontologist).
2. The project paleontologist retained shall review the approved development plan and grading plan and conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the project paleontologist in a Paleontological Resource Impact Mitigation Program (PRIMP). This PRIMP shall be submitted for approval by the County Geologist prior to issuance of a Grading Permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standards and Society of Vertebrate Paleontology standards, are as follows:
 - a. A corresponding and active County Grading Permit (BGR) Number must be included in the title of the report. PRIMP reports submitted without a BGR number in the title will not be reviewed.
 - b. PRIMP must be accompanied by the final grading plan for the subject project.
 - c. Description of the proposed site and planned grading operations.
 - d. Description of the level of monitoring required for all earth-moving activities in the project area.
 - e. Identification and qualifications of the qualified paleontological monitor to be employed for grading operations monitoring.
 - f. Identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for recovery of large specimens.
 - g. 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.
 - h. Means and methods to be employed by the paleontological monitor to quickly salvage fossils as they are unearthed to avoid construction delays.
 - i. Sampling of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates.
 - j. Procedures and protocol for collecting and processing of samples and specimens.
 - k. Fossil identification and curation procedures to be employed.
 - l. Identification of the permanent repository to receive any recovered fossil material. Pursuant the County "SABER Policy", paleontological fossils found in the County should, by preference, be directed to the Western Science Center in the City of Hemet. A written agreement between the property owner/developer and the repository must be in place prior to site grading.
 - m. All pertinent exhibits, maps, and references.
 - n. Procedures for reporting of findings.

- o. 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. The property owner and/or applicant on whose land the paleontological fossils are discovered shall provide appropriate funding for monitoring, reporting, delivery and curating the fossils at the institution where the fossils will be placed and will provide confirmation to the County that such funding has been paid to the institution. All reports shall be signed by the qualified paleontologist responsible for the report's content. All reports shall also be signed by all other parties responsible for the report's content (e.g., Professional Geologist), as necessary. A signed electronic copy of the report, project plans, and all required review applications shall be uploaded to the County's PLUS Online System. Please use the following for this purpose:
https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/Filing_Instructions_Paleontological_Report_Review_Application.pdf
https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/PLUS_Online_Upload_Instructions_Paleontology.pdf
https://planning.rctlma.org/sites/g/files/aldnop416/files/users/user91/Supplemental_Information_Form_PALEO.pdf Reports and/or review applications are not to be submitted directly to the County Geologist, Project Planner, Land Use Counter, Plan Check, or any other County office. Reports and/or review applications are not to be submitted directly to the County Geologist, Project Planner, Land Use Counter, Plan Check, or any other County office. 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. Safeguard Artifacts Being Excavated in Riverside County (SABER)

Mitigation Measure PAL-2: Prior to the final grading inspection, the applicant shall submit a Paleontological Monitoring Report prepared for site grading operations at this site. The report shall be certified by the professionally qualified Paleontologist responsible for the content of the report. This Paleontologist must be on the County's Paleontology Consultant List. The report shall include the findings made during all site grading activities and an appended itemized list of fossil specimens recovered during grading (if any) and proof of accession of fossil materials into the pre-approved museum repository. In addition, all appropriate fossil location information shall be submitted to the Western Center, the San Bernardino County Museum and Los Angeles County Museum of Natural History, at a minimum, for incorporation into their Regional Locality Inventories. A signed electronic copy of the report shall be uploaded to the County's PLUS Online System: (<https://planning.rctlma.org/sites/g/files/aldnop416/files/2023-06/PLUS%20Online%20Upload%20Instructions%20-%20Paleontology%20-%20Updated%20June%202023.pdf>). Reports and/or review applications are not to be submitted directly to the County Geologist, Project Planner, Land Use Counter, Plan Check, or any other County office.

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