

CONDITIONALLY APPROVED

- BY THE PLANNING DEPARTMENT
- BY THE PLANNING DIRECTOR
- BY THE PLANNING COMMISSION
- BY THE CITY COUNCIL

FOR THE CITY OF WILDOMAR ON 08/11/21
APPLICATION NOS. PA 20-0044

PLANNER Matthew Bassi

SIGNATURE Matthew Bassi

April 2021 | Draft Supplemental Environmental Impact Report
State Clearinghouse No. 2004071076

OAK SPRINGS RANCH PHASE 2 PROJECT: REVISED PLOT PLAN SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (PA 20-0044)

City of Wildomar

Prepared for:

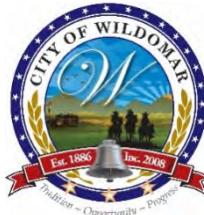
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NOTICE OF AVAILABILITY

FOR PUBLIC REVIEW OF A DRAFT SUPPLEMENTAL ENVIRONMENTAL REPORT FOR THE OAK SPRINGS RANCH PHASE 2 PROJECT: REVISED PLOT PLAN

A Draft Supplemental Environmental Impact Report (SEIR) has been prepared by the City of Wildomar for the Oak Springs Ranch Phase 2 Project: Revised Plot Plan. The Draft SEIR and technical appendices will be available for public review/comment beginning on Wednesday, April 21, 2021. Due to the COVID-19 pandemic, Wildomar City Hall is currently closed so the SEIR and Technical studies can only be accessed via the city's website above. All files can be downloaded from the City of Wildomar website at <https://www.cityofwildomar.org/cms/One.aspx?portalId=9894827&pageId=10911316>.

Proposed Project: The proposed Project would eliminate the approved 103 single-family dwelling units designated in Planning Area (PA2) of the Oak Springs Ranch Specific Plan area and instead construct a 288-unit multifamily apartment project. The following actions are required by the City in addition to certification of the SEIR:

- 1) General Plan Amendment – In accordance with Section 17.08.040 of the Wildomar Municipal Code, the proposed project requires approval of a general plan amendment to change the existing land use designation from Medium High Density Residential (MHDR, 5-8 units/acre) to Highest Density Residential (HHDR, 20+ units/acre) for the project site to accommodate the 288-unit apartment community at a density of 22.3 units/acre for the 12.89-acre site located on the west side of Inland Valley Drive about 550 feet south of Clinton Keith Road (APN: 380-250-038).
- 2) Specific Plan Amendment – In accordance with Section 17.08.080 of the Wildomar Municipal Code, the proposed project requires approval of a specific plan amendment to amend Section 3.2 (Planning Area 2) of the Oak Springs Ranch Specific Plan to replace the detached single family residential development (TTM No. 31736) with the proposed 288-unit apartment community with related on-site and off-site improvements and amenities.
- 3) Zoning Ordinance Amendment – Approval is required to amend Section 17.110, SP Zone Requirements and Standards for Specific Plan No. 340, of the Wildomar Municipal Code. This Code Section will be deleted in its entirety and development of the Modified Project will comply with the development standards of SP No. 340, as amended.
- 4) Plot Plan – In accordance with Section 17.216 of the Wildomar Municipal Code, the proposed project requires approval of a plot plan to develop the proposed 288-unit apartment community on the 12.68-acre parcel (APN: 380-250-038) with related on-site and off-site improvements and amenities.

The Draft SEIR identifies impacts that require mitigation in the following topic areas: aesthetics, air quality, greenhouse gas emissions and energy, land use and planning, noise, population and housing, public services, and transportation. As with the Original Project, under the Modified Project, the following topic areas will continue to be significant and unavoidable: air quality, noise, transportation. The project site is not located on any hazardous materials sites enumerated under Section 65962.5 of the California Government Code.

In accordance with Section 15087 of the CEQA Guidelines, this public notice is posted to officially notify the public, public agencies, and responsible and trustee agencies that the required 45-day public review/comment period will commence on **Wednesday, April 21, 2021 and conclude on Friday, June 4, 2021**. Any written comments (via email or letter) on the Draft SEIR must be submitted no later than 5 p.m. on June 4, 2021. Written comments may be mailed to Matthew C. Bassi, Planning Director, City of Wildomar Planning Department, 23873 Clinton Keith Road, Suite 201, Wildomar, CA 92595. Email comments can be sent to mbassi@cityofwildomar.org. The Planning Commission is tentatively scheduled to review the Draft SEIR and proposed development project at their special meeting of July 21, 2021.

Published: April 21, 2021

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Abbreviations and Acronyms

ABBREVIATIONS AND ACRONYMS

Acronym/Abbreviation	Meaning
AAQS	ambient air quality standards
AB	Assembly Bill
ACM	Asbestos-containing materials
ADT	average daily trip
AFE	Corporate Average Fuel Economy
Amsl	Above mean sea level
AQMP	Air Quality Management Plan
ATP	Active Transportation Plan
BAAQMD	Bay Area Quality Management District
BAU	Business-as-usual
BMP	best management practices
BTU	British thermal units
C-P-S	Scenic Highway Commercial
CalEEMod	California Emissions Estimator Model
CalGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	California Climate Action Team
CBC	California Building Code
CBSC	California Building Standards Commission
CCCC	California Climate Change Center
CCR	California Code of Regulations
CDG	California Department of Forestry and Fire Protection
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFC	California Fire Code
cfs	Cubic feet per second
CH ₄	methane
Chloroethene	vinyl chloride
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO ₂	carbon dioxide
CO _{2e}	carbon dioxide-equivalent
CRMP	Cultural Resources Management Plan
CTCs	County transportation commissions

Abbreviations and Acronyms

Acronym/Abbreviation	Meaning
dB	Decibel
dBA	A-Weighted Decibel
DIF	Development Impact Fee
DOF	California Department of Finance
DPM	Diesel particulate matter
DSEIR	Draft Supplemental Environmental Impact Report
DWR	Department of Water Resources
EBGMP	Elsinore Basin Groundwater Management Plan
EDR	Environmental Data Resources
EIR	environmental impact report
EPA	US Environmental Protection Agency
EVMWD	Elsinore Valley Municipal Water District
°F	Fahrenheit
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GDP	gross domestic product
GHG	greenhouse gas
GIS	geographic information system
gpd	gallons per day
GWh	gigawatt-hours
GWP	Global warming potential
H ₂ S	hydrogen sulfide
HAA	Housing Accountability Act
HCD	Housing and Community Development Department
HFHSZ	high fire hazard severity zone
HHDR	Highest High Density Residential
Hz	Hertz
I-	Interstate
I-P	Industrial Park
IFC	International Fire Code
in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
ITE	Institute of Transportation Engineers' Trip Generation Manual
ITS	Intelligent Transportation Systems
kW	kilowatts
kWh	kilowatt-hours
LCFS	Low Carbon Fuel Standard
Leq	Equivalent Continuous Noise level
LEUSD	Lake Elsinore Unified School District

Abbreviations and Acronyms

Acronym/Abbreviation	Meaning
LI	Light Industrial
L _{dn}	Day-Night Sound Level
Ln	Statistical Sound Level
LST	localized significance thresholds
MATES	Multiple Air Toxics Exposure Study
MHDR	Medium High Density Residential
MMcf/day	million cubic feet per day
MMRP	Mitigation Monitoring and Reporting Plan
MMTCO ₂ e	Million metric tons of CO ₂ e
MPG	miles per gallon
MPOs	Metropolitan planning organizations
MTCO ₂ e	metric ton of CO ₂ e
NO	nitric oxide
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NOP	Notice of Preparation
NPDES	National Pollution Discharge Elimination System
NSR	New Source Review
NZE	near-zero-emission
O ₃	ozone
ODS	Ozone Depleting Substances
OEHHA	Office of Environmental Health Hazards Assessment
OPR	Governor's Office of Planning and Research
OS-CH	Conservation Habitat
PA2	Planning Area 2
Pb	lead
PM	particulate matter
PM _{2.5}	fine inhalable particulate matter
PM ₁₀	coarse inhalable particulate matter
ppb	parts per billion
ppm	parts per million
PPP	Plans, programs, and policies
PPV	Peak Particle Velocity
PVC	Polyvinyl chloride
RBBB	Southwest Road and Bridge Benefits District
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCSD	Riverside County Sheriff Department
RCTC	Riverside County Transportation Commission
RHNA	Regional Housing Needs Allocation

Abbreviations and Acronyms

Acronym/Abbreviation	Meaning
ROGs	Reactive Organic Gases
RPA	Registered Professional Archaeologist
RPS	Renewables portfolio standard
RTA	Riverside Transit Agency
RTP	Regional Transportation Plan
SAFE	Safer Affordable Fuel Efficient
SB	Senate Bill
SCAG	Southern California Association of Governments
SCE	Southern California Edison
SCH	State Clearinghouse
SCS	Sustainable Community Strategies
SDRWQCB	San Diego Regional Water Quality Control Board
SEIR	supplemental environmental impact report
SF ₆	sulfur hexafluoride
SIP	State Implementation Plan
SRA	Source Receptor Area
SO ₂	sulfur dioxide
SO ₄	sulfates
SO _x	sulfur oxides
SoCAB	South Coast Air Basin
SoCalGas	Southern California Gas Company
South Coast AQMD	South Coast Air Quality Management District
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	toxic air pollutants
TDM	Transportation Demand Management
TLMA	Transportation Land Management Agency
TOD	transit-oriented design
tpd	Tons per day
TRU	Transport Refrigeration units
TUMF	Transportation Uniform Mitigation Fee
VdB	Vibration Decibel
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments
WRF	Regional Water Reclamation Facility
ZE	zero emissions

1. Executive Summary

1.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that local government agencies consider the environmental consequences before acting on projects over which they have discretionary approval authority. An environmental impact report (EIR) analyzes potential environmental consequences to inform the public and support informed decisions by the city.

1.2 CERTIFIED 2007 EIR (ORIGINAL PROJECT)

The 2007 Oak Springs Ranch Specific Plan Project (Original Project) EIR (2007 EIR) was certified by the Riverside County in 2007 (Clearinghouse [SCH] No. 2004071076). The approved Original Project allows for the development of 312 multifamily dwelling units in Planning Area 1 and 103 single-family units in Planning Area 2 (for a total of 415 dwelling units) on a 48.15-acre site (“Specific Plan area”), and allows for approximately 14 acres to remain as undeveloped open space in Planning Area 3, with approximately 34 acres developed for residential uses. The Draft Specific Plan Amendment has been included in Appendix 1-1.

This document is a draft supplemental environmental impact report (SEIR) to the 2007 EIR and evaluates a request to modify the previously approved Original Project to allow for 288 multifamily units in nine buildings and one amenity building located on approximately 12.89 acres (“project site”) instead of the 103 single-family dwelling units. In 2014, the 312 multifamily dwelling units were constructed.

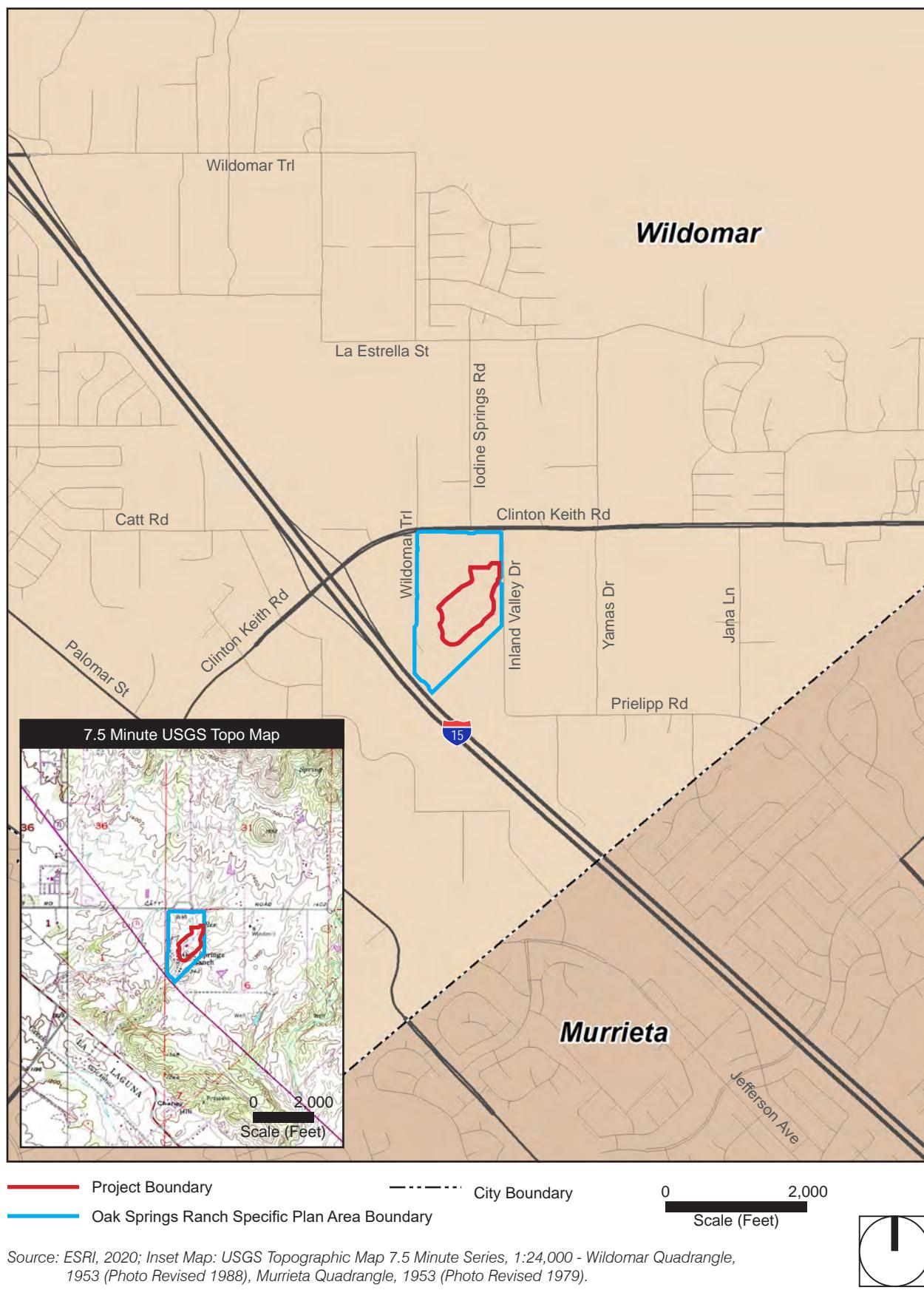
1.3 PROJECT LOCATION

The project site is within the City of Wildomar in western Riverside County, as shown in Figure 1-1, *Regional Location*. The entire Oak Springs Ranch Specific Plan site (Assessor’s Parcel Numbers [APN] 380250035, 380250038, 380250036) is approximately 48.15 acres and is bound by Clinton Keith Road to the north, Inland Valley Drive to the east, Inland Valley Medical Center and Interstate 15 (I-15) to the south, and Oak Springs Road to the west. The project site (APN 380250038) is currently vacant; the portion of the Specific Plan area located to the north of the project site has been developed with the 312 multifamily dwelling units. The proposed 288 multifamily dwelling units and amenity building would be in the central portion of the site as shown in Figure 1-2, *Aerial Photograph*; Figure 1-2 also shows the Planning Areas in the Oak Springs Ranch Specific Plan area.

1. Executive Summary

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Figure 1-1 - Regional Location



1. Executive Summary

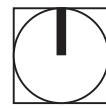
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Figure 1-2 - Aerial Photograph



Project Boundary
Oak Springs Ranch Specific Plan Area Boundary

0 360
Scale (Feet)



Source: Nearmap, 2020

PlaceWorks

1. Executive Summary

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1. Executive Summary

1.3.1 SEIR Format

Chapter 1. Executive Summary: Summarizes the background and description of the Original Project and the Modified Project, the format of this SEIR, project alternatives, any critical issues remaining to be resolved, and the potential environmental impacts and mitigation measures identified for the Modified Project.

Chapter 2. Introduction: Describes the purpose of this SEIR, background on the Original and Modified Project, the notice of preparation (NOP), the use of incorporation by reference, and Final SEIR certification.

Chapter 3. Project Description: A detailed description of the Modified Project, including its objectives, its area and location, approvals anticipated to be required as part of the Modified Project, necessary environmental clearances, and the intended uses of this SEIR.

Chapter 4. Environmental Setting: A description of the physical environmental conditions in the vicinity of the Modified Project as they existed at the time the NOP was published, from local and regional perspectives. These provide the baseline physical conditions from which the lead agency determines the significance of the Modified Project's environmental impacts.

Chapter 5. Environmental Analysis: Each environmental topic is analyzed in a separate section that discusses the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the Modified Project; the existing environmental setting; the potential adverse and beneficial effects of the Modified Project; the level of impact significance before mitigation; the mitigation measures for the Original Project and the Modified Project; the level of significance after mitigation is incorporated; and the potential cumulative impacts of the Modified Project and other existing, approved, and proposed development in the area.

Chapter 6. Unavoidable Impacts, Irreversible Changes, and Growth-Inducing Impacts: Describes the significant unavoidable adverse impacts of the Modified Project, the significant irreversible environmental changes associated with the Modified Project, and the ways in which the Modified Project would cause increases in employment or population that could result in new physical or environmental impacts.

Chapter 7. Alternatives to the Modified Project: Describes the alternatives and compares their impacts to the impacts of the Modified Project.

Chapter 8. Impacts Found Not to Be Significant: Briefly describes the potential impacts of the Modified Project that were determined not to be significant and were therefore not discussed in detail in this SEIR.

Chapter 9. Organizations Consulted and Qualifications of Preparers: Lists the people and organizations that were contacted during the preparation of this SEIR and the people who prepared this SEIR for the Modified Project.

Appendices: The appendices for this document (in PDF format on a CD attached to the front cover) comprise these supporting documents:

Appendix 1-1: Draft Specific Plan Amendment

Appendix 1-2: NOP and NOP Comment Letters

1. Executive Summary

Appendix 5.2-1: Air Quality and Greenhouse Gas Emissions Assumptions and Modeling

Appendix 5.5-1: Noise Analysis

Appendix 5.8-1: Traffic Impact Analysis

Appendix 8-1: Preliminary Water Quality Management Plan

Appendix 8-2: Retention Basin Study

1.3.2 Impacts Considered Less than Significant

Chapter 8 of this Draft SEIR lists the environmental topics that would not result in any new, or more significant environmental effects, of the Modified Project when compared to the impacts disclosed in the 2007 EIR (Original Project). Therefore, the topics are not discussed in detail in Chapter 5 of this Draft SEIR.

1.3.3 Unavoidable Significant Adverse Impacts

If the City, as the lead agency, determines that unavoidable significant adverse impacts would result from the Modified Project, the City must prepare a “Statement of Overriding Considerations” before it can approve the Modified Project. A Statement of Overriding Considerations is a statement made by the decision-making body indicating that it has balanced the benefits of the Modified Project against its unavoidable significant environmental effects and has determined that the benefits of the Modified Project outweigh the adverse effects, and therefore, the adverse effects are considered acceptable.

The 2007 EIR for the Original Project identified the following significant and unavoidable adverse impacts, as defined by CEQA (numbering is from the 2007 EIR):

Air Quality

- **Impact 5.2-2:** Implementation of the Oak Springs Ranch Specific Plan would violate air quality standards and contribute substantially to an existing or projected air quality violation.
- **Impact 5.2-3:** The Oak Springs Ranch Specific Plan project would result in a cumulatively considerable net increase of criteria pollutants for which the SoCAB is in nonattainment.
- **Impact 5.2-4:** Construction of the Oak Springs Ranch Specific Plan would expose sensitive receptors project to substantial concentrations of PM₁₀ during grading operations.
- **Impact 5.2-6:** The Oak Springs Ranch Specific Plan project would expose sensitive receptors within 500 feet of Interstate 15 to substantial pollutant concentrations.

Noise

- **Impact 5.9-1:** The project would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

1. Executive Summary

Traffic and Circulation

- **Impact 5.12-1:** The proposed project would cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system exceeding, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.

The Modified Project would not result in any substantially increased or new impacts. In fact, with mitigation, all of the impacts above would be reduced to a less than significant level.

1.4 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. Regarding the Modified Project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this Draft SEIR adequately describes the environmental impacts of the Modified Project.
2. Whether the benefits of the Modified Project override those environmental impacts that cannot be feasibly avoided or mitigated to a level of insignificance.
3. Whether the proposed land use changes are compatible with the character of the existing area.
4. Whether the identified goals, policies, or mitigation measures should be adopted or modified.
5. Whether there are other mitigation measures that should be applied to the Modified Project besides the mitigation measures identified in the Draft SEIR.
6. Whether there are any alternatives to the Modified Project that would substantially lessen any of the significant impacts of the Modified Project and achieve most of the basic project objectives.

1.5 AREAS OF CONTROVERSY

The NOP did not identify any areas of controversy.

1.6 NOTICE OF PREPARATION

The objective of distributing the Notice of Preparation (NOP) is to solicit public comment to identify and determine the full range and scope of issues of concern so that these issues might be fully examined in the SEIR. The comment period for the NOP began December 22, 2020, and ended January 20, 2021. Table 1-1, *NOP Comment Letters Received*, summarizes the comments received during the NOP period; the NOP and letters are included in Appendix 1-2.

1. Executive Summary

Table 1-1 NOP Comment Letters Received

<u>Agency/Organization/Individual</u>	<u>Date</u>	<u>Comments</u>	<u>Section of SEIR Comment is Addressed</u>
Native American Heritage Commission (Andrew Green)	December 21, 2020	• Tribal cultural resources and consultation process.	• Chapter 8, Impacts Not Found to be Significant
South Coast Air Quality Management District (Lijin Sun, JD)	January 19, 2021	• Air quality impacts	• Chapter 5.2, Air Quality
Inland Empire Biking Alliance (Marven E. Norman)	January 20, 2021	• Desire for bicycling to be included as part of the mitigation measures	• Chapter 5.8, Transportation

1.7 SUMMARY OF ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Table 1-2, *Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation*, summarizes the conclusions of the environmental analysis contained in this SEIR. Impacts are identified as no impact, potentially significant or less than significant, and mitigation measures are identified for all potentially significant impacts. The following 2007 EIR (Original Project) mitigation measures are modified using *italic underline* or ~~strikeout~~ to be consistent with the analysis in this Draft SEIR. The level of significance after implementation of the mitigation measures is also presented.

1. Executive Summary

Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.1 AESTHETICS			
Impact 5.1-1: Would the Modified Project have a substantial adverse effect on a scenic vista and, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the Modified Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.1-2: Would the Modified Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway or substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	No mitigation measures are required.	No Impact

1. Executive Summary

Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.1-3: Would the Modified Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Potentially Significant	<p>The following mitigation measures from the Original Project would continue to apply:</p> <ul style="list-style-type: none"> • Mitigation Measure 5.1-3A: New lights would be situated and arranged so that no direct beam would leave the project site and no lighting would be directed to Planning Area 3, the conservation area. Luminaries shall be provided with filtering louvers and hoods. During installation, the luminaries shall be aimed and corrected by a field crew to aim the lights away from viewers. Light fixtures installed shall be designed and constructed so that 90 percent of light rays emitted by the fixture are projected below the horizontal plane passing through the lowest point of the shield. • Mitigation Measure 5.1-3B: Onsite buildings shall use low-reflective glass and building materials to keep daytime glare to a minimum. • Mitigation Measure 5.1-3C: All exterior lights shall be shielded where feasible and focused to minimize spill light into the night sky or adjacent properties in accordance with <i>Wildomar Municipal Code Chapter 8.64</i>, <i>County Ordinance No. 655, Zone B</i>, restrictions on onsite lighting. • Mitigation Measure 5.1-3D: New exterior lighting used for security purposes in the evening would be limited to low wattage, energy-conserving night lighting. • Mitigation Measure 5.1-3E: Outdoor lighting that conforms <i>with Wildomar Municipal Code Chapter 8.64 to Ordinance No. 655</i> shall be shown on electrical plans submitted prior to the issuance of building permit and shall be reviewed and approved by the Building and Safety Department. Prior to final building inspection, outdoor lighting shall be inspected by the Building and Safety Department to ensure compliance with the approved lighting plan. • Mitigation Measure 5.1-3F: Landscaping shall be installed per the approved plan and inspected by the Planning Department prior to Final Building Inspection. 	Less Than Significant
5.2 AIR QUALITY			
Impact 5.2-1: Would the Modified Project result in a cumulatively considerable net increase of criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard during construction activities?	Potentially Significant	<p>The following mitigation measures from the Original Project would continue to apply:</p> <ul style="list-style-type: none"> • Mitigation Measure 5.2-2A: The property owner/developer shall implement standard mitigation measures in accordance with South Coast AQMD Rules 402 and 403 to control fugitive dust emissions and ensure that nuisance dust conditions do not occur during construction. In addition to the standard measures, the property owner/developer shall implement supplemental measures as feasible to reduce fugitive dust emissions to the 	Less Than Significant

1. Executive Summary

Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	AQ-1	<p>extent feasible during construction operations, in addition to mitigation measures to reduce construction-related emissions of NO_x, PM₁₀, and VOCs. To assure compliance, the County shall verify compliance with these measures during normal construction site inspections. The measures to be implemented are listed below:</p> <ul style="list-style-type: none"> ○ Apply soil stabilizers to inactive areas ○ Replace ground cover in disturbed areas quickly ○ Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph ○ Water the haul route and exposed surfaces three times per day ○ Use of construction equipment with low emission factors and high energy efficiency where possible ○ Perform regulatory scheduled engine maintenance (off-site) to minimize equipment emissions ○ Use of electric- or diesel-powered equipment rather than gasoline powered engines where feasible <p>● Mitigation Measure 5.2-2B: The developer shall use zero Volatile Organic Compounds (VOC) content architectural coatings during the construction of the project to the maximum extent feasible. Use of Zero-VOC paints assumes no more than 100 gram/liter of VOC.</p> <p>AQ-1 During construction, the construction contractor(s) shall limit the hauling of soil generated from grading/excavation activities to a maximum of 140 trucks per day (1,350 one-way soil haul trips per day if 16 cubic yard trucks are used; or 675 one-way soil haul trips if double haul trucks with a 30 cubic yard capacity is used; and assuming a one-way haul distance of 65 miles). The developer is required to find an export site within a 65-mile radius, and if one cannot be located, then the truck trips per day will need to be reduced to ensure impacts remain less than significant. Haul trucks with engines that are 2010 or newer shall be used for soil hauling activities. These requirements shall be noted on all construction</p>	

1. Executive Summary

Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		management plans and verified by the City of Wildomar Building & Safety Department prior to issuance of any construction permits and during the soil-disturbing phases.	
Impact 5.2-2: Would the Modified Project result in a cumulatively considerable net increase of criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard during long-term operational activities?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.2-3: Would the Modified Project expose sensitive receptors to substantial pollutant concentrations?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.2-4: Would the Modified Project conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.2-5: Would the Modified Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less Than Significant	No mitigation measures are required.	Less Than Significant

1. Executive Summary

Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.3 GREENHOUSE GAS EMISSIONS AND ENERGY			
Impact 5.3-1: Would the Modified Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.3-2: Would the Modified Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.3-3: Would the Modified Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.3-4: Would the Modified Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant	No mitigation measures are required.	Less Than Significant

1. Executive Summary

Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.4 LAND USE AND PLANNING			
Impact 5.4-1: Would the Modified Project physically divide an established community?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.4-2: Would the Modified 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	No mitigation measures are required.	Less Than Significant
5.5 NOISE			
Impact 5.5-1: Would the Modified Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.5-2: Would the Modified Project result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.5-3: Would the Modified Project result in generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.5-4: Would the Modified Project expose people residing or working in the project area to excessive noise levels, for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport?	Less Than Significant	No mitigation measures are required.	Less Than Significant

1. Executive Summary

Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.6 POPULATION AND HOUSING			
Impact 5.6-1: Would the Modified 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	No mitigation measures are required.	Less Than Significant
Impact 5.6-2: Would the Modified Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less Than Significant	No mitigation measures are required.	Less Than Significant
5.7 PUBLIC SERVICES			
Impact 5.7-1: Would the Modified Project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.7-2: Would the Modified Project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?	Less Than Significant	No mitigation measures are required.	Less Than Significant

1. Executive Summary

Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.7-3: Would the Modified Project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for school services?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.7-4: Would the Modified Project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for library services?	Less Than Significant	No mitigation measures are required.	Less Than Significant
5.8 TRANSPORTATION			
Impact 5.8-1: Would the Modified Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less Than Significant	No mitigation measures are required.	Less Than Significant

1. Executive Summary

Table 1-2 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.8-2: Would the Modified Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	Less Than Significant	No mitigation measures are required.	Less Than Significant
Impact 5.8-3: Would the Modified Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible (e.g., farm equipment), or result in inadequate emergency access?	Less Than Significant	No mitigation measures are required.	Less Than Significant

2. Introduction

2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The intent of this draft supplemental environmental impact report (SEIR) is to provide sufficient information on the potential environmental impacts of the proposed changes to the Oak Springs Ranch Phase 2 Project (Modified Project) to allow the City of Wildomar (City) to make an informed decision regarding approval of the Modified Project. Specific discretionary actions to be reviewed by the City are described in Section 3.3, *Intended Uses of the SEIR*. The SEIR analyzed the incremental changes in environmental impacts as a result of the Modified Project.

This Draft SEIR has been prepared in accordance with requirements of the:

- California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code, §§ 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations, §§ 15000 et seq.)

The City, as lead agency under CEQA, determined that an SEIR was appropriate to satisfy CEQA requirements (State CEQA Guidelines § 15163) by fully disclosing new impacts or changes in impacts that would occur as a result of the Modified Project.

According to State CEQA Guidelines, Section 15163, an SEIR is prepared when:

1. Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and
2. Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

Further, as explained therein:

- The supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised.
- A supplement to an EIR shall be given the same kind of notice and public review as is given to a draft EIR under Section 15087.
- A supplement to an EIR may be circulated by itself without recirculating the previous draft or final EIR.
- When the agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the supplemental EIR. A finding under Section 15091 shall be made for each significant effect shown in the previous EIR as revised.

2. Introduction

State CEQA Guidelines Section 15162 states:

- a. When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 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 occur 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 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 negative declaration was adopted, shows any of the following:
 - i. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - ii. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - iii. 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 measure or alternative; or
 - iv. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Here, the City determined that an SEIR was appropriate because substantial changes to the Original Project are proposed, but only minor additions or changes are necessary to make the 2007 EIR adequate for the Modified Project. There are no new potential significant environmental effects due to changes to the Original Project. No new significant and unavoidable impacts were identified for the Modified Project. However, the impacts identified as significant and unavoidable for the Original Project would remain significant and unavoidable for the Modified Project, after mitigation measures are applied.

2.2 NOTICE OF PREPARATION

The City determined that an SEIR would be appropriate for the Modified Project and issued a Notice of Preparation (NOP) on December 22, 2020 (see Appendix 1-1). Comments received during the NOP public review period, from December 22, 2020, to January 20, 2021, are in Appendix 1-1.

2. Introduction

The NOP process helped determine the scope of the environmental issues to be addressed in the Draft SEIR. Based on this process, certain environmental categories were identified as having the potential to result in significant impacts. Issues considered potentially significant are addressed in this Draft SEIR, but issues identified as less than significant or no impact are discussed in Chapter 8, *Impacts Found Not to be Significant*.

2.3 SCOPE OF THIS DRAFT SEIR

This Draft SEIR only evaluates the potential impacts of the Modified Project, i.e., the construction of 288 multifamily dwelling units instead of 103 single-family dwelling units, and does not alter the existing approved 312 multifamily dwelling development (constructed in 2014) or open space component of the Original Project. While CEQA requires a plan-to-ground analysis, which in this case is a vacant site, many of the potential impacts of the Modified Project have been addressed in the 2007 EIR for the Original Project. All applicable mitigation measures included in the adopted Mitigation Monitoring and Reporting Plan (MMRP) will continue to apply to the area affected by the Modified Project and have been included in the appropriate Draft SEIR sections. For example, mitigation measures regulating dust control, grading, and other physical construction impacts that already apply to the Original Project and would continue to apply to the Modified Project. As a result, the Draft SEIR scope was limited to changes in aesthetics, air quality, greenhouse gas emissions, land use and planning, noise, population and housing, public services, and transportation.

The information in Chapter 3, *Project Description*, establishes the basis for analyzing future, project-related environmental impacts. However, further environmental review by the City may be required as more detailed information and plans are submitted on a project-by-project basis.

2.3.1 Significant and Unavoidable Impacts from the 2007 EIR

The Original Project resulted in significant and unavoidable impacts to Air Quality, Noise, and Transportation. The Original Project would violate air quality standards and contribute substantially to an existing or projected air quality violation, result in a cumulatively considerable net increase of criteria pollutants for which SoCAB is in nonattainment, expose sensitive receptors to substantial concentrations of PM₁₀ during construction activities, and expose sensitive receptors within 500 feet of Interstate 15 to substantial pollutant concentrations. The Original Project would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Additionally, the Original Project would cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system exceeding, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.

2.3.2 Impacts Considered Less Than Significant

During preparation of the technical studies, the City determined that 11 environmental impact categories were not significantly affected by the Modified Project, or that the previously adopted mitigation measures remain adequate to address impacts associated with the Modified Project. Because the following environmental issues were found to be less than significant in the 2007 EIR and would have an identical finding for the Modified Project, they are not discussed in detail in this Draft SEIR (see Chapter 8, *Impacts Found Not to be Significant*).

2. Introduction

- Agriculture and Forestry Resources
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Recreation
- Utilities and Service Systems
- Tribal Cultural Resources
- Wildfire

2.3.3 Potentially Significant Adverse Impacts

The City determined that eight environmental factors would be potentially significant in the Modified Project. Therefore, the following topics are evaluated in this SEIR.

- Aesthetics
- Air Quality
- Greenhouse Gas Emissions and Energy
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Transportation

2.3.4 Unavoidable Significant Adverse Impacts

The 2007 EIR identified air quality, noise, and traffic impacts as significant and unavoidable. The Modified Project would not result in any new or substantially more severe significant impacts. In fact, with mitigation, all of the significant and unavoidable impacts of the 2007 EIR would be reduced to a less than significant level.

2.4 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this Draft SEIR, consistent with Section 15150 of the CEQA Guidelines, and they are available for review at the City.

- *Draft Environmental Impact Report No. 478 for County of Riverside Specific Plan No. 340, Tentative Tract No. 31736, Plot Plan No. 18966 Oak Springs Ranch*, prepared by The Planning Center (PlaceWorks), December 2006
- *Final Oak Springs Ranch Specific Plan Environmental Impact Report*, prepared by The Planning Center (PlaceWorks), May 2007
- City of Wildomar General Plan
- City of Wildomar Zoning Code (Title 17, City of Wildomar Municipal Code)
- City of Wildomar Development Standards (Title 17, City of Wildomar Municipal Code)
- City of Wildomar Multi-Family Residential Objective Design Standards (Title 17, City of Wildomar Municipal Code)

2. Introduction

2.5 FINAL SEIR CERTIFICATION

This Draft SEIR is being circulated for public review for 45 days. Interested agencies and members of the public are invited to provide written comments on the Draft SEIR to the City address shown on the title page of this document. Upon completion of the 45-day review period, the City will review all written comments received and prepare written responses for each. A Final SEIR will incorporate the received comments, responses to the comments, and any changes to the Draft SEIR that result from comments. The Final SEIR will be presented to the City for potential certification as the environmental document for the Modified Project. All persons who comment on the Draft SEIR will be notified of the availability of the Final SEIR and the date of the public hearing before the City.

The Draft SEIR is available to the general public for review at various locations.

- On the City's website:
<http://www.cityofwildomar.org/cms/One.aspx?portalId=9894827&pageId=10911316>
- In person at the City of Wildomar, Planning Department: 23873 Clinton Keith Road, Suite 201, Wildomar, California, 92595

2.6 MITIGATION MONITORING

Public Resources Code Section 21081.6 requires that agencies adopt a monitoring or reporting program for any project for which it has made findings pursuant to Public Resources Code Section 21081 or adopted a Negative Declaration pursuant to Section 21080(c). Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR.

The MMRP for the Modified Project will be completed as part of the Final SEIR, prior to consideration of the Modified Project by the Wildomar City Council.

3. Project Description

3.1 INTRODUCTION

The term “project,” as defined by the California Environmental Quality Act (CEQA) Guidelines, means “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)...enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700” (CEQA Guidelines, §15378(a)). The CEQA Guidelines further explain that a “project” refers to the activity that is being approved and that may be subject to several discretionary approvals by governmental agencies (CEQA Guidelines §15378(c)).

3.1.1 Project Location

The project site is within the City of Wildomar in western Riverside County, as shown in Figure 1-1, *Regional Location*. The entire Oak Springs Ranch Specific Plan site (APN 380250035, 380250038, 380250036) is approximately 48.15 acres and is bound by Clinton Keith Road to the north, Inland Valley Drive to the east, Inland Valley Medical Center and I-15 to the south, and Oak Springs Road to the west. The project site (APN 380250038) is currently vacant; the portion of the Specific Plan area located to the north of the project site has been developed with the 312 multifamily dwelling units. The proposed 288 multifamily dwelling units and amenity building would be in the central portion of the site as shown in Figure 1-2, *Aerial Photograph*; Figure 1-2 also shows the Planning Areas in the Oak Springs Ranch Specific Plan area.

3.1.2 Description of the Modified Project

The Modified Project would eliminate the approved 103 single-family dwelling units designated in Planning Area 2 (PA2) of the Specific Plan area to instead construct 288 multifamily dwelling units. The following project actions are requested of the City by the applicant and reviewed in this SEIR.

General Plan and Specific Plan Amendment

The Modified Project requires approval of a General Plan Amendment to change the designation from Medium High Density Residential (MHDR) to Highest High Density Residential (HHDR) and a Specific Plan Amendment to change the designation of the site from Oak Springs Ranch SP PA2 Detached Residential to Oak Springs Ranch SP PA2 Multifamily Residential. Additionally, a General Plan Amendment is required to change the designation of a portion of the open space area (southern tip) from Light Industrial (LI) to Conservation Habitat (OS-CH), consistent with the rest of the open space area in the Specific Plan Area.

3. Project Description

Zoning Ordinance Amendment

The Modified Project requires the approval of a Zoning Ordinance Amendment (No. 2021-05) to amend Section 17.110, SP Zone Requirements and Standards for Specific Plan No. 340, of the Wildomar Municipal Code. This Code Section will be deleted in its entirety and development of the Modified Project will comply with the development standards of SP No. 340, as amended.

Oak Springs Ranch Phase 2 Project Plot Plan

The Modified Project includes a plot plan to develop 288 multifamily dwelling units in nine buildings (3-story, approximately 39 feet and 3-inches-high to the roofline) and one amenity building (1-story, approximately 19 feet and 6-inches-high to the roofline) on 12.89 acres (APN 380250038). The typical building would be comprised of one- and two-bedroom units with both apartments and townhouses. The Modified Project would include 267 covered parking spaces and 206 uncovered spaces for residents and guests, 17 of which would be ADA-compliant. A proposed detention basin would be located at the southern portion of the site. The Modified Project would create an extension of the community trail system around the perimeter that connects to the Oak Springs Phase 1 perimeter trail to the north and the trail along Inland Valley Road to the south. Outdoor amenities would include landscaped areas, such as a centralized lawn with outdoor kitchens, communal pool area with outdoor kitchen, tot lot, and dog park area to support the proposed residential use. The Modified Project would also provide indoor amenities, including a club room and fitness area. The indoor community areas would be located adjacent to outdoor amenities to create a strong indoor-outdoor connection. Figure 3-1, *Site Plan*, shows the proposed modifications for the site. As shown in Figure 3-1, the site can be accessed through a driveway on Inland Valley Drive or through the existing development constructed under Phase 1. Access within the site would be provided around the perimeter of the site. Figure 3-2a and Figure 3-2b, *Residential Elevations*, show the various elevations of the proposed multifamily dwelling units. Figure 3-3, *Amenity Building Elevation*, shows the elevation of the proposed amenity building.

As shown in Figure 3-2a and Figure 3-2b, *Residential Elevations*, the residential buildings would be three-stories, and would have dark and light gray stucco finishes, brown roofing, gray vinyl windows, tan stone veneer, wood railings, and aluminum garage doors and trellises. The proposed residential buildings would be up to 39.25 feet in height. The amenity building would be one-story and would have a similar façade as the residential buildings – light gray stucco finish, gray vinyl windows, brown roofing, and stone veneer, as shown in Figure 3-3, *Amenity Building Elevation*.

3. Project Description

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Figure 3-1 - Site Plan



3. Project Description

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Figure 3-2a - Residential Elevations



3. Project Description

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Figure 3-2b - Residential Elevations



3. Project Description

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Figure 3-3 - Residential Elevations



3. Project Description

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3. Project Description

Construction

Construction will involve removal of ruderal vegetation, grading to finished design elevations, excavation to allow construction of building foundations, utilities, roadways, parking areas, sidewalks, and landscaping. Equipment used during construction may include, but is not limited to, crawler tractors, rubber-tired dozers, excavators, graders, scrapers, cranes, forklifts, generator sets, welders, pavers, paving equipment, rollers, and air compressors. The Modified Project would require the haul of materials during grading activities.

The Modified Project is anticipated to be constructed over a period of up to 24 months, from April 2022 to April 2024.

Operations

The proposed residential uses and amenities would be used by residents of the Oak Springs Ranch Specific Plan, and operational activities would be similar to other residential uses in the City.

3.2 STATEMENT OF OBJECTIVES

Objectives for the Oak Springs Ranch Phase 2 Project will aid decision makers in their review of the Modified Project and associated environmental impacts:

1. Create land uses that are compatible with and contribute to the surrounding community.
2. Increase the City's multi-family housing stock.
3. Create a high-quality development that enhances the project site and provides indoor and outdoor amenities for existing and future residents of the Oak Springs Ranch Specific Plan.
4. Incorporate architectural design elements that reflect the Contemporary Craftsman Architectural Style per the City's Commercial Design Guidelines.
5. Create a development that is financially feasible and that will contribute to the City's economic base without negatively affecting existing City resources.

3.3 INTENDED USES OF THE SEIR

CEQA Guidelines, Section 15124(d) requires the lead agency to include in the project description a statement briefly describing the intended uses of the EIR. This Draft SEIR examines the environmental impacts of the Modified Project. The anticipated approvals required for the proposed project are:

- General Plan Amendment
- Specific Plan Amendment
- Zoning Ordinance Amendment
- Plot Plan
- Final Site Plan of Development

3. Project Description

- Building Permits

4. Environmental Setting

4.1 INTRODUCTION

This section provides a “description of the physical environmental conditions on the project site, and in the vicinity of the project, as they exist at the time the notice of preparation is published, ... from both a local and a regional perspective” (California Environmental Quality Act [CEQA] Guidelines § 15125[a]), pursuant to provisions of CEQA and the CEQA Guidelines. However, the scope of environmental review in this supplemental environmental impact report (SEIR) is guided by the principle that a lead agency, when preparing an SEIR, must evaluate only the changes to the project, changes in circumstances, or new information that led to the preparation of the SEIR. The purpose of CEQA’s supplemental review provisions is to fully disclose new impacts or incremental changes in impacts that would occur as a result of project modifications.

4.2 EXISTING CONDITIONS

The Modified Project is in the City of Wildomar (City) in western Riverside County. The 48.15-acre Oak Springs Ranch Specific Plan Area is bound by Clinton Keith Road to the north, Inland Valley Drive to the east, Inland Medical Center and Interstate 15 to the south, and Oak Springs Road to the west. The proposed modifications would occur at the southwest corner of Inland Valley Drive and Clinton Keith Road, and would encompass approximately 12.89 acres. The General Plan designation of the site is Medium High Density Residential (MHDR). Figure 4-1a through Figure 4-1c, *Site Photographs*, show the existing conditions of the site; the site is vacant and undeveloped with buildings, but contains detention basin.

4.2.1 Regional Planning Considerations

Southern California Association of Governments (SCAG)

The Southern California Association of Governments (SCAG) is a council of governments representing Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG is the federally recognized metropolitan planning organization for this region, which encompasses over 38,000 square miles. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs.

The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted on September 3, 2020. The 2020-2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. It embodies a collective vision for the region’s future and is developed with input from local governments, county transportation commissions

4. Environmental Setting

(CTCs), tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

The SCS is supported by a combination of transportation and land use strategies that help the region achieve state greenhouse gas emission reduction goals and federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry and utilize resources more efficiently.

Western Riverside Council of Governments

The purpose of the Western Riverside Council of Governments (WRCOG) is to unify Western Riverside County to create a collective voice on important issues that affect its members. Representatives from 18 cities, the Riverside County Board of Supervisors, and the Eastern and Western Municipal Water Districts, have seats on the WRCOG Executive Committee, the group that sets policy for the organization, and the Riverside County Superintendent of Schools is an ex-officio member.

WRCOG implements two transportation plans—the Transportation Uniform Mitigation Fee (TUMF) program ensures that new development pays its fair share for the increased traffic that it creates, and the Western Riverside County Active Transportation Plan (ATP) aims to improve transportation choices within the subregion for the benefit of all residents, employees, and visitors by identifying regional facilities to provide more transportation options.

4.2.1.1 SOUTH COAST AIR BASIN AIR QUALITY MANAGEMENT PLAN

The project area is in the South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (South Coast AQMD). Pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and state law, and standards are detailed in the SoCAB Air Quality Management Plan (AQMP). Air pollutants for which ambient air quality standards (AAQS) have been developed are known as criteria air pollutants, including ozone (O_3), carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_x), sulfur dioxide, coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), and lead. VOC and NO_x are criteria pollutant precursors and go on to form secondary criteria pollutants, such as O_3 , through chemical and photochemical reactions in the atmosphere. Air basins are classified as attainment/nonattainment areas for particular pollutants, depending on whether they meet AAQS for that pollutant. Based on the SoCAB AQMP, the SoCAB is designated nonattainment for O_3 , $PM_{2.5}$, PM_{10} , and lead (Los Angeles County only) under the California and National AAQS and nonattainment for NO_2 under the California AAQS.

4.2.1.2 GREENHOUSE GAS EMISSIONS REDUCTION LEGISLATION

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in Executive Order S-03-05; Assembly Bill (AB) 32, the Global Warming Solutions Act (2008); Executive Order B-15-30 and Senate Bill (SB) 32; SB 375; and Executive Order B-5518 and SB 100.

Executive Order S-03-05, signed June 1, 2005, set the following GHG reduction goals for the State of California:

4. Environmental Setting

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

AB 32 was passed by the state legislature on August 31, 2006, to place the state on a course toward reducing its contribution of GHG emissions. AB 32 established a legislative target for the year 2020 goal outlined in Executive Order S-03-05. CARB prepared its first Scoping Plan in 2008 outlining the state's plan for achieving the 2020 targets of AB 32.

In 2008, SB 375 was adopted to connect passenger-vehicle GHG emissions reduction targets for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled (VMT) and vehicle trips.

In September 2016, Governor Brown signed SB 32, making the Executive Order B-15-30 goal for year 2030 of a 40 percent reduction below 1990 levels by 2030 into a statewide-mandated legislative target. CARB issued an update to its Scoping Plan in 2017, which sets forth programs for meeting the SB 32 reduction target.

Executive Order B-55-18 sets a goal for the state to achieve carbon neutrality no later than 2045 and to achieve and maintain net negative emissions thereafter. SB 100 would help the state reach the goal set by Executive Order B-55-18 by requiring that the state's electricity suppliers have a source mix that consists of at least 60 percent renewable/zero carbon sources in 2030 and 100 percent renewable/zero carbon sources in 2045.

4.2.1.3 SENATE BILL 743

On September 27, 2013, SB 743 was signed into law. SB 743 started a process that could fundamentally change transportation impact analysis as part of CEQA compliance. The legislature found that with the adoption of SB 375, the state had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce VMT and thereby contribute to the reduction of GHG emissions, as required by the California Global Warming Solutions Act of 2006 (AB 32).

SB 743 generally eliminates auto delay, level of service, and other similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts under CEQA. Pursuant to the CEQA Guidelines, the new criteria "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code § 21099[b][1]).

Pursuant to SB 743, the Natural Resources Agency adopted revisions to the CEQA Guidelines to implement SB 743 on December 28, 2018. The revised CEQA Guidelines establish new criteria for determining the significance of transportation impacts. Under the new guidelines, VMT-related metric(s) that evaluate the significance of transportation-related impacts under CEQA for development projects, land use plans, and transportation infrastructure projects, are required beginning July 1, 2020. The legislation does not preclude the application of local general plan policies, zoning codes, conditions of approval, or any other planning requirements that require evaluation of level of service, but these metrics can no longer constitute the basis for

4. Environmental Setting

determining transportation impacts under CEQA. The City of Wildomar adopted VMT standards on June 10, 2020.

4.3 LOCAL ENVIRONMENTAL SETTING

4.3.1 Aesthetics

Scenic vistas and scenic backdrop in the project vicinity include views of mountain ridgelines. Existing aesthetic conditions in the City are analyzed in Section 5.1, *Aesthetics*, of this Draft SEIR.

4.3.2 Air Quality

The SoCAB, which is managed by South Coast AQMD, is designated as nonattainment for O₃; PM_{2.5}, under the California and National AAQS; nonattainment for PM₁₀ under the California AAQS; and nonattainment for lead (Los Angeles County only) under the National AAQS. A discussion of regional air quality considerations is described in Section 4.2.1.1. Existing air quality conditions in the City are analyzed in Section 5.2, *Air Quality*, of this Draft SEIR.

4.3.3 Greenhouse Gas Emissions

Global climate change is not confined to a particular project area, and even very large projects do not generate enough GHG emissions on their own to influence global climate change significantly. A discussion of regional GHG considerations is described in Section 4.2.1.2. Refer to Section 5.3, *Greenhouse Gas Emissions*, of this Draft SEIR, for a discussion of existing GHG emissions in California.

4.3.4 Land Use and Planning

The Modified Project would require a General Plan Amendment from Medium High Density Residential (MHDR) to Highest High Density Residential (HHDR) and a Specific Plan Amendment from Oak Springs Ranch SP PA2 Detached Residential to Oak Springs Ranch SP PA2 Multifamily Residential. Refer to Section 5.4, *Land Use and Planning*, of this Draft SEIR.

4.3.5 Noise

The project site is currently vacant, and therefore, does not contain noise sources. However, the noise environment for the site is predominately characterized by the surrounding multi-family residential, commercial, and hospital land uses as well as Interstate 15 and local roadway traffic. Section 5.5, *Noise*, of the Draft SEIR discusses noise impacts at the project site.

4.3.6 Population and Housing

The project site is currently vacant and development on the site could directly or indirectly induce population growth. The proposed General Plan and Specific Plan Amendments would increase density onsite. Impacts related to population and housing are discussed in Section 5.6, *Population and Housing*, of this Draft SEIR.

4. Environmental Setting

4.3.7 Public Services

Public services would be provided by Riverside County Fire Department, Riverside County Sheriff's Department, and Lake Elsinore Unified School District which currently provide services to the surrounding area and development under Phase 1 of the Specific Plan. Impacts to public services are discussed in Section 5.7, *Public Services*, of this Draft SEIR.

4.3.8 Transportation

Regional access to the project area is provided by I-15, which runs north to south and is approximately 735 feet west of the site. Refer to Section 5.8, *Transportation*, for additional information concerning traffic and transportation.

4.4 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS

Section 15130 of the CEQA Guidelines states that cumulative impacts shall be discussed where they are significant. It further states that this discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not in as great a level of detail as that necessary for the project alone. Section 15355 of the CEQA Guidelines defines cumulative impacts to be "...two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts represent the change caused by the incremental impact of a project when added to other proposed or committed projects in the vicinity.

The CEQA Guidelines (Section 15130 [b][1]) state that the information used in an analysis of cumulative impacts should come from one of two sources:

- A. A list of past, present, and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- B. A summary of projections contained in an adopted general plan or related planning document designed to evaluate regional or area-wide conditions.

Depending on the environmental category, the cumulative impact analysis may use either source A or B. Some impacts are site specific, and others may have impacts outside the city's boundaries, such as regional air quality. Please refer to Chapter 5, *Environmental Analysis*, for a discussion of the cumulative impacts associated with development and growth in the City and region for each environmental resource area.

Cumulative impact analyses for several topical sections are also based on the most appropriate geographic boundary for the respective impact. Several potential cumulative impacts that encompass regional boundaries (e.g., air quality and traffic) have been addressed in the context of various regional plans and defined significance thresholds. Climate change is a global issue, and the cumulative impacts analysis has been addressed in the context of state regulations and regional plans designed to address the global cumulative impact. Table 4-1, *Related Cumulative Projects*, provides a list of cumulative projects.

4. Environmental Setting

Table 4-1 Related Cumulative Projects

Project/Applicant Name	Project Size
Baxter Village Medical Office and Hotel Project	84,000 square feet, 102 rooms
Veterans Wildomar South	3,161 square feet
Culture Cannabis Club, Inc.	1,440 square feet
Authentic Wildomar Cannabis	2,500 square feet
Cannabis 21/Loud SD, Inc.	3,057 square feet
Element 7 Wildomar, LLC	2,500 square feet
Veterans Wildomar North	3,379 square feet
Veterans Wildomar Central	2,792 square feet
Westpark Promenade Development	118,354 square feet
Clinton Keith Village Retail Center	40,000 square feet
Grove Park Mixed Use Project	40,000 square feet
Rancon Medical/Retail Center and Business Park	96,240 square feet
Life Storage Mini-Warehouse	60,800 square feet
Smith Ranch Self-Storage	150,000 square feet
Milestone RV/Boat Storage	8,300 square feet
Horizons/Strata Mixed Use Project	86 dwelling units
Wildomar Springs Retail Center	27,000 square feet
Nova Homes Residential	77 single-family residential lots
Villa Siena Apartment Project	180 multifamily residential units
Camelia Townhomes	163 multifamily residential units
Rhoades Residential Project	131 single-family residential lots
Faith Bible Church	74,309 square feet

Source: Urban Systems Associates, Inc. 2020: City project list

Figure 4-1a - Site Photographs



Project Boundary

4. Environmental Setting

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Figure 4-1b - Site Photographs



Project Boundary

4. Environmental Setting

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Figure 4-1c - Site Photographs



5. Environmental Analysis

Chapter 5 examines the environmental setting of the Modified Project, analyzes its effects and the significance of its impacts, and recommends mitigation measures to reduce or avoid impacts. This chapter has a separate section for each environmental issue area that was determined to need further study in the SEIR. Environmental issues and their corresponding sections are:

- 5.1 Aesthetics
- 5.2 Air Quality
- 5.3 Greenhouse Gas Emissions and Energy
- 5.4 Land Use and Planning
- 5.5 Noise
- 5.6 Population and Housing
- 5.7 Public Services
- 5.8 Transportation

Sections 5.1 through 5.8 provide a discussion of the environmental setting, impacts associated with the Modified Project, and mitigation measures designed to reduce significant impacts where required and when feasible. The residual impacts following the implementation of any mitigation measure are also discussed.

The Notice of Preparation determined that certain issues under an environmental topic would not be significantly affected by implementation of the Modified Project; these issues are not discussed further in this SEIR as described in Section 8, *Impacts Found Not to be Significant*.

5.1 ORGANIZATION OF ENVIRONMENTAL ANALYSIS

To assist the reader with comparing information between environmental issues, each section is organized under 10 major headings:

- Environmental Setting
- Thresholds of Significance
- The 2007 Approved Project (Original Project)
- Applicable Mitigation Measures from the 2007 EIR
- Environmental Impacts of the Modified Project
- Cumulative Impacts
- Level of Significance Before Additional Mitigation
- Additional Mitigation Measures for the Modified Project
- Level of Significance After Additional Mitigation

5. Environmental Analysis

- References

In addition, Chapter 1, *Executive Summary*, has a table that summarizes all impacts by environmental issue.

5.2 TERMINOLOGY USED IN THIS DRAFT SEIR

The level of significance is identified for each impact in this DSEIR. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

- **No impact.** The project would not change the environment.
- **Less than significant.** The project would not cause any substantial, adverse change in the environment.
- **Less than significant with mitigation incorporated.** The SEIR includes mitigation measures that avoid substantial adverse impacts on the environment.
- **Significant and unavoidable.** The project would cause a substantial adverse effect on the environment, and no feasible mitigation measures are available to reduce the impact to a less than significant level.

5. Environmental Analysis

5.1 AESTHETICS

This section of the Draft Supplemental Environmental Impact Report (Draft SEIR) discusses the potential impacts to the visual character of the project area and its surroundings from development of the Modified Project. This section includes a discussion of the qualitative aesthetic characteristics of the environment that could be potentially degraded by the Modified Project's implementation. The assessment of aesthetic impacts is subjective by nature. Aesthetics generally refer to the identification of visual resources and the quality of what can be seen, as well as an overall visual perception of the environment. This analysis attempts to identify and objectively examine factors that contribute to the perception of aesthetic impacts. Potential aesthetic impacts can be evaluated by considering proposed grade separations, landform alteration, building setbacks, scale, massing, and landscaping features associated with the design of the Modified Project.

5.1.1 Environmental Setting

5.1.1.1 REGULATORY BACKGROUND

Local

City of Wildomar General Plan

The Land Use Element of City's General Plan provides the following policies to accommodate community design and preserve and protect scenic resources:

- **Policy LU-3.1:** Accommodate land use development in accordance with the patterns and distribution of use and density depicted on the General Plan Land Use Maps (Figure LU-1) and the Area Plan Land Use Maps in accordance with the following concepts: (AI 1, 3, 9, 10)
 - Accommodate communities that provide a balanced mix of land uses, including employment, recreation, shopping, and housing.
 - Assist in and promote the development of infill and underutilized parcels which are located in Community Development areas, as identified in the General Plan Land Use Map.
 - Promote parcel consolidation or coordinated planning of adjacent parcels through incentive programs and planning assistance.
 - Create street and trail networks that directly connect local destinations, and that are friendly to pedestrians, equestrians, bicyclists, and others using non-motorized forms of transportation.
 - Re-plan existing urban cores and specific plans for higher density, compact development as appropriate to achieve the RCIP Vision.
 - In new towns, accommodate compact, transit-adaptive infrastructure (based on modified standards that take into account transit system facilities or street network).
 - Provide the opportunity to link communities through access to multi-modal transportation systems.

5. Environmental Analysis

AESTHETICS

- **Policy LU-3.3:** Promote the development and preservation of unique communities in which each community exhibits a special sense of place and quality of design. (AI 14, 30)
- **Policy LU-4.1:** Require that new development be located and designed to visually enhance, not degrade the character of the surrounding area through consideration of the following concepts: (AI 1, 3, 6, 14, 23, 24, 41, 62)
 - Compliance with the design standards of the appropriate area plan land use category.
 - Require that structures be constructed in accordance with the requirements of the County's zoning, building, and other pertinent codes and regulations.
 - Require that an appropriate landscape plan be submitted and implemented for development projects subject to discretionary review.
 - Require that new development utilize drought tolerant landscaping and incorporate adequate drought-conscious irrigation systems.
 - Pursue energy efficiency through street configuration, building orientation, and landscaping to capitalize on shading and facilitate solar energy, as provided for in Title 24 of the California Administrative Code.
 - Incorporate water conservation techniques, such as groundwater recharge basins, use of porous pavement, drought tolerant landscaping, and water recycling, as appropriate.
 - Encourage innovative and creative design concepts.
 - Encourage the provision of public art.
 - Include consistent and well-designed signage that is integrated with the building's architectural character.
 - Provide safe and convenient vehicular access and reciprocal access between adjacent commercial uses.
 - Locate site entries and storage bays to minimize conflicts with adjacent residential neighborhoods.
 - Mitigate noise, odor, lighting, and other impacts on surrounding properties.
 - Provide and maintain landscaping in open spaces and parking lots.
 - Include extensive landscaping.
 - Preserve natural features, such as unique natural terrain, drainage ways, and native vegetation, wherever possible, particularly where they provide continuity with more extensive regional systems.
 - Require that new development be designed to provide adequate space for pedestrian connectivity and access, recreational trails, vehicular access and parking, supporting functions, open space, and other pertinent elements.
 - Design parking lots and structures to be functionally and visually integrated and connected.
 - Site buildings access points along sidewalks, pedestrian areas, and bicycle routes, and include amenities that encourage pedestrian activity.
 - Establish safe and frequent pedestrian crossings.

5. Environmental Analysis AESTHETICS

- Create a human-scale ground floor environment that includes public open areas that separate pedestrian space from auto traffic or where mixed, it does so with special regard to pedestrian safety.
- **Policy LU-4.2:** Require property owners to maintain structures and landscaping to a high standard of design, health, and safety through the following: (AI 5)
 - Provide proactive code enforcement activities.
 - Promote programs and work with local service organizations and educational institutions to inform residential, commercial, and industrial property owners and tenants about property maintenance methods.
 - Promote and support community and neighborhood-based efforts for the maintenance, upkeep, and renovation of structures and sites.
- **Policy LU-13.1:** Preserve and protect outstanding scenic vistas and visual features for the enjoyment of the traveling public. (AI 32, 79)
- **Policy LU-13.3:** Ensure that the design and appearance of new landscaping, structures, equipment, signs, or grading within Designated and Eligible State and County scenic highway corridors are compatible with the surrounding scenic setting or environment. (AI 3, 32, 39)
- **Policy LU-13.4:** Maintain at least a 50-foot setback from the edge of the right-of-way for new development adjacent to Designated and Eligible State and County Scenic Highways. (AI 3)
- **Policy LU-13.5:** Require new or relocated electric or communication distribution lines, which would be visible from Designated and Eligible State and County Scenic Highways, to be placed underground. (AI 3, 32)
- **Policy LU-13.6:** Prohibit offsite outdoor advertising displays that are visible from Designated and Eligible State County Scenic Highways. (AI 6)
- **Policy LU-13.7:** Require that the size, height, and type of on-premise signs and visible from Designated and Eligible State and County Scenic Highways be the minimum necessary for identification. The design, materials, color, and location of the signs shall blend with the environment, utilizing natural materials where possible. (AI 3)
- **Policy LU-13.8:** Avoid the blocking of public views by solid walls. (AI 3)

City of Wildomar Municipal Code

The purpose of Chapter 8.64, Light Pollution, of the Wildomar Municipal Code is to provide regulations for outdoor lighting that will preserve the access to the dark night sky; reduce light pollution in order to support astronomical activity and protect the viability of the Palomar Observatory; minimize adverse offsite impacts of lighting such as light trespass, an obtrusive light, particularly in residential neighborhoods; conserve energy

5. Environmental Analysis

AESTHETICS

and resources to the greatest extent possible; and ensure adequate lighting for the safety, security, and well-being of persons engaged in outdoor nighttime activities.

Chapter 17.110, SP Zone Requirements and Standards for Specific Plan No. 340, provides general development standards for residential and open space and trail uses in the Oak Springs Ranch Specific Plan area including building height and lot area.

Multi-Family Residential Objective Design Standards

The purpose of the Multi-Family Residential Objective Design Standards is to provide developers, builders, and architects with a clear statement of the desired architectural and site design characteristics for new residential development in Wildomar that enhances the area's unique character and raises the quality of design within the City. Drawn from regional vernacular and contemporary styles, the Craftsman, Farm Chic, and French and Colonial Revival descriptions and guidelines are intended to establish strong, consistent design image and direction that reflects the desires, aspirations and vision of the City of Wildomar (Wildomar 2020). The guidelines for the selected architectural styles respond to local architectural precedents, regional climate conditions, and local building practices and materials. Additionally, the guidelines provide required elements for form and massing, roof designs, walls and window designs, materials and colors, and decorative accents and details.

5.1.1.2 EXISTING CONDITIONS

Visual Character and Visual Resources

An aerial photograph of the site is shown in Figure 1-2, *Aerial Photograph*, in Chapter 1, *Executive Summary*. The vacant project site is approximately 12.89 acres and contains ruderal vegetation. The site is in an urbanized portion of Wildomar and is bounded by residential uses in the Oak Springs Ranch Specific Plan area to the north, vacant land to the east, open space in the Oak Springs Ranch Specific Plan area to the west and south. As shown in Figure 4-1a through 4-1c, *Site Photographs*, views of mountains and surrounding development and roadways can be seen from the site. As shown in the site photographs, there are no rock outcroppings, massive trees, or historic buildings.

Landform and Topography

Elevation on the site ranges from 1,310 feet in the southern portion of the site to approximately 1,341 feet in the northern portion of the site.

Scenic Vistas and Corridors

According to Figure C-9 of the City's General Plan, Interstate 15 (I-15), which is approximately 735 feet west of the site, is designated as a State Eligible highway (Wildomar 2003).

5.1.2 Thresholds of Significance

Appendix G of the CEQA Guidelines states that, "except as provided in Public Resources Code Section 21099," a project would normally have a significant effect on the environment if the project would:

5. Environmental Analysis AESTHETICS

- AE-1 Have a substantial adverse effect on a scenic vista.
- AE-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- AE-3 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 point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
- AE-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

5.1.3 The 2007 Approved Project (Original Project)

The 2007 EIR determined that changes to topography and impacts to scenic resources, such as onsite oak trees, would occur due to cut and fill and site preparation for the Specific Plan area. The 2007 EIR stated that the Original Project was designed to maximize views to the natural riparian area and would not block foreground views. The 2007 EIR states that the Original Project would not impact middle-ground views as residential developments to the north of the Specific Plan area cannot see the riparian area. The multifamily buildings proposed as part of the Original Project would be lower than the height of surrounding uses and would not obstruct background scenic views. Proposed lighting would be required to comply with Riverside County Ordinance No. 655 which regulates light pollution. The Specific Plan area is located in Zone B of the Palomar Observatory restricted light zone; Zone B is defined as the circular ring area defined by two circles, one 45 miles in radius, centered on Palomar Observatory, and the other the perimeter of Zone A (Zone A is defined as the circular area 15 miles in radius centered on the Palomar Observatory). Mitigation measures (Mitigation Measures 5.1-3A through 5.1-3F) were provided to reduce impacts to light and glare to a less than significant level.

5.1.4 Applicable Mitigation Measures from the 2007 EIR

The following mitigation measures from the 2007 EIR would be applicable to the Modified Project. These mitigation measures have been incorporated into the Mitigation Monitoring Program for the Modified Project and have been modified as applicable to clarify the language and to reflect minor changes caused by the Modified Project. Modifications to the original mitigation measures are identified in strikeout text to indicate deletions and underlined to signify new, inserted text:

- **Mitigation Measure 5.1-3A:** New lights would be situated and arranged so that no direct beam would leave the project site and no lighting would be directed to Planning Area 3, the conservation area. Luminaries shall be provided with filtering louvers and hoods. During installation, the luminaries shall be aimed and corrected by a field crew to aim the lights away from viewers. Light fixtures installed shall be designed and constructed so that 90 percent of light rays emitted by the fixture are projected below the horizontal plane passing through the lowest point of the shield.

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- **Mitigation Measure 5.1-3B:** Onsite buildings shall use low-reflective glass and building materials to keep daytime glare to a minimum.
- **Mitigation Measure 5.1-3C:** All exterior lights shall be shielded where feasible and focused to minimize spill light into the night sky or adjacent properties in accordance with Wildomar Municipal Code Chapter 8.64 County Ordinance No. 655, Zone B, restrictions on onsite lighting.
- **Mitigation Measure 5.1-3D:** New exterior lighting used for security purposes in the evening would be limited to low wattage, energy-conserving night lighting.
- **Mitigation Measure 5.1-3E:** Outdoor lighting that conforms with Wildomar Municipal Code Chapter 8.64 to Ordinance No. 655 shall be shown on electrical plans submitted prior to the issuance of building permit and shall be reviewed and approved by the Building and Safety Department. Prior to final building inspection, outdoor lighting shall be inspected by the Building and Safety Department to ensure compliance with the approved lighting plan.
- **Mitigation Measure 5.1-3F:** Landscaping shall be installed per the approved plan and inspected by the Planning Department prior to Final Building Inspection.

5.1.5 Environmental Impacts of the Modified Project

Impact 5.1-1: Would the Modified Project have a substantial adverse effect on a scenic vista and, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the Modified Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality? [Thresholds AE-1 and AE-3]

The Modified Project would result in the development of 288 multifamily dwelling units in nine buildings and one amenity building instead of the Original Project's 103 single-family dwelling units.

Scenic Vistas

Vistas provide access or panoramic views to a large geographic area. Scenic vistas and scenic backdrops in the project vicinity include views of the mountain ridgelines from approximately 4,000 feet above mean sea level (amsl) to 10,000 feet amsl. The project site is vacant and located within an urbanized portion of the City that is generally flat. Due to the distance, varying topography, and existing development surrounding the site that includes two-story structures, views of scenic vistas would not be significantly impacted.

Visual Character

Figure 3-1, *Site Plan*, shows that the residential uses under the Modified Project would be located in the central portion of the Specific Plan area.

As shown in Figure 3-2a and Figure 3-2b, *Residential Elevations*, the residential buildings would be three-stories, and would have dark and light gray stucco finishes, brown roofing, gray vinyl windows, tan stone veneer,

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wood railings, and aluminum garage doors and trellises. The amenity building would be one-story and would have a similar façade as the residential buildings – light gray stucco finish, gray vinyl windows, brown roofing, and stone veneer, as shown in Figure 3-3, *Amenity Building Elevation*.

The proposed residential buildings would be up to 39.25 feet in height. According to Section 17.110.020, Planning Area 2, of the Wildomar Municipal Code, the maximum building height is 35 feet; the Modified Project would require a Zoning Ordinance Amendment to revise the development standards for Planning Area 2 to allow an increase in height above 35 feet. Under the Original Project, single-family homes were designated for Planning Area 2, and therefore, the height of the single-family homes would have been less than the proposed multifamily buildings. Nonetheless, the multifamily homes proposed in Planning Area 1 under the Original Project (to the north of the project site) were constructed in 2014 and are approximately the same height as the buildings proposed for the Modified Project. The 2007 EIR concluded that views of scenic resources would not be impacted by the development proposed in the 2007 certified EIR due to topography and distance from scenic resources. The Modified Project's impacts would also be less than significant because the Modified Project would construct development that would be similar in height to existing development in the Specific Plan area and surroundings. Like the Original Project, the Modified Project would not conflict with zoning and other regulations governing scenic quality, with approval of the requested Zoning Ordinance Amendment.

The Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects, and the Modified Project would not result in new or more significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.1-1 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required.

Level of Significance After Mitigation: Impact 5.1-1 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Impact 5.1-2: Would the Modified Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway or substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? [Threshold AE-2]

As indicated in Figure C-9, of the City of Wildomar General Plan, I-15 which is 735 feet west of the project site, is designated as a State Eligible Highway, but is not officially designated as a State Scenic Highway (Wildomar 2003). Therefore, project implementation would not damage scenic resources, including trees, rock outcroppings, and historic buildings, within a State Scenic Highway. No impact would occur.

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As indicated in the 2007 certified EIR, impacts to scenic highways were determined to be less than significant in the Initial Study prepared for the Original Project, and therefore were not analyzed further in the 2007 EIR.

The Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects, and the Modified Project would not result in new or more significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.1-2 would not be significant.

Additional Mitigation Measures for the Modified Project

No mitigation measures are required.

Level of Significance After Mitigation: Impact 5.1-2 would not be significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Impact 5.1-3: Would the Modified Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? [Threshold AE-4]

The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates outside the intended area. Glare occurs when a bright object, such as reflected sunlight, oncoming vehicle headlights, or an unshielded light bulb, generates nuisance light or difficulty seeing. Spill light and glare impacts are the effects of a project's exterior lighting upon adjoining uses and areas.

Nighttime Light and Glare

As the project site is vacant, it does not contain existing sources of nighttime illumination. However, there is currently onsite light and glare caused by the surrounding land uses and roadways. The Modified Project would include nine residential buildings and one amenity building on the project site, as well as their related lighting sources (vehicle lights, security lights, and exterior lighting). Additionally, the proposed structures would likely also result in exterior glazing (e.g. windows and doors) that could result in new sources of glare. Despite new sources of nighttime illumination and glare, the Modified Project is not expected to generate a substantial increase in light and glare. With implementation of mitigation measures identified for the Original Project, lighting would be directed to not cause light to spill outside the project site. The Modified Project would adhere to development standards and design guidelines of the City of Wildomar and General Plan, which regulate lighting such as Chapter 8.64 of the Wildomar Municipal Code. Additionally, the proposed landscaping and buildings would block glare from parked cars and traffic from surrounding roadways and land uses. Therefore, impacts would be less than significant with the implementation of the mitigation measures from the 2007 EIR.

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Daytime Glare

The 2007 EIR concluded that the Original Project must adhere to the Riverside County Ordinance No. 655, Regulating Light Pollution, which restricts the use of certain light fixtures emitting undesirable light rays into the night sky. The 2007 EIR concluded that the implementation of Mitigation Measures 5.1-3A through 5.1-3F, which require that lights be directed within the project site, buildings use low-reflective glass and materials, exterior lights be shielded, exterior lights be low wattage, outdoor lighting conforming to Ordinance No. 655 (replaced with City of Wildomar Municipal Code Chapter 8.64), and landscaping be installed per the approved plan, would reduce impacts to less than significant.

The Modified Project includes building materials and architectural treatments that could cause daytime glare, but would be similar to the buildings constructed for Planning Area 1. The development of the Modified Project would produce glare sources that are typical of residential buildings, such as building material (glass and light-colored building materials), and vehicles parked and traveling along neighboring streets. However, glare from these sources is typical of the surrounding area and would not increase glare beyond what was found to be less than significant for Planning Area 1. Therefore, daytime glare impacts from the Modified Project would be less than significant with the implementation of the mitigation measures from the 2007 EIR.

The Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects, and the Modified Project would not result in new or more significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.1-3 would be potentially significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required for the Modified Project beyond the applicable mitigation measures from the 2007 EIR.

Level of Significance After Mitigation: Impact 5.1-3 would be less than significant with the implementation of the mitigation measures from the 2007 EIR.

The Modified Project would not result in new or substantially more severe significant impacts.

5.1.6 Cumulative Impacts

Aesthetic impacts are localized to the project site and its immediate surroundings. As with the Modified Project, cumulative projects within the project vicinity are not anticipated to substantially alter the visual character of the areas surrounding the project site, which include commercial, medical, and residential uses. Because of the urbanized project area, the Modified Project would not negatively impact the visual character on- or off-site. Similarly, due to the existence of light and glare from the surrounding uses, the Modified Project is not expected to add significantly to the creation of nighttime light and glare in the vicinity. The proposed buildings on the project site would create new sources of light and glare in the project vicinity, but such buildings would be primarily surrounded by perimeter landscaping which would reduce the impacts of

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light and glare. Their impacts would therefore not combine with those of other projects in the area to adversely impact existing or planned sensitive receptors, such as residential uses. As discussed above, the Modified Project's aesthetic impacts would be similar to the Original Project's impacts. Therefore, the Modified Project's contribution to cumulative aesthetic impacts is less than considerable, and therefore, is less than cumulatively significant.

5.1.7 Level of Significance Before Additional Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, all impacts would be less than significant.

5.1.8 Additional Mitigation Measures for Modified Project

No mitigation measures are required.

5.1.9 Level of Significance After Additional Mitigation

Impacts would be less than significant.

5.1.10 References

Wildomar, City of. 2003, October. City of Wildomar General Plan.

http://www.cityofwildomar.org/UserFiles/Servers/Server_9894739/File/Government/Departments/Planning/General%20Plan.pdf.

_____. 2020. Multi-Family Residential Objective Design Standards.

https://cityofwildomar.org/UserFiles/Servers/Server_9894739/File/Government/Departments/Planning/Multi-Family%20Design%20Guidelines/Wildomar%20Multi-Family%20Design%20Standards-Guidelines%20Book-Final%209-9-20-reduced.pdf.

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5.2 AIR QUALITY

This section of the Draft SEIR evaluates the potential air quality impacts of the Modified Project compared to the air quality impacts of the Original Project. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (South Coast AQMD). The analysis focuses on air pollution from regional emissions and localized pollutant concentrations. Criteria air pollutant emissions modeling was conducted using the California Emissions Estimator Model (CaleEEMod), Version 2016.3.2.25, is included in Appendix 5.2-1 of this SEIR. Cumulative impacts related to air quality are based on the regional boundaries of the South Coast Air Basin (SoCAB).

5.2.1 Environmental Setting

Criteria Air Pollutants

The pollutants emitted into the ambient air by stationary and mobile sources are categorized as primary and/or secondary pollutants. Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_x), sulfur dioxide (SO₂), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), and lead (Pb) are primary air pollutants. Of these, CO, SO₂, NO₂, PM₁₀, and PM_{2.5} are “criteria air pollutants,” which means that ambient air quality standards (AAQS) have been established for them. VOC and NO_x are criteria pollutant precursors that form secondary criteria air pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O₃) and nitrogen dioxide (NO₂) are the principal secondary pollutants.

A description of each of the primary and secondary criteria air pollutants and its known health effects is presented below.

- **Carbon Monoxide** is a colorless, odorless gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is a primary criteria air pollutant. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. The highest ambient CO concentrations are generally found near traffic-congested corridors and intersections. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation (South Coast AQMD 2005; USEPA 2020). The SoCAB is designated under the California and National AAQS as being in attainment of CO criteria levels (CARB 2019).
- **Nitrogen Oxides** are a by-product of fuel combustion and contribute to the formation of ground-level O₃, PM₁₀, and PM_{2.5}. The two major forms of NO_x are nitric oxide (NO) and nitrogen dioxide (NO₂). NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. The principal form of NO_x produced by combustion is NO, but NO reacts quickly with oxygen to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO₂ is an acute irritant and more injurious than NO in equal concentrations. At atmospheric concentrations, however, NO₂ is only potentially irritating. NO₂ absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. NO₂ exposure concentrations near roadways are of

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particular concern for susceptible individuals, including asthmatics, children, and the elderly. Current scientific evidence links short-term NO₂ exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects, including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. Also, studies show a connection between elevated short-term NO₂ concentrations and increased visits to emergency departments and hospital admissions for respiratory issues, especially asthma (South Coast AQMD 2005; USEPA 2021a). The SoCAB is designated an attainment area for NO₂ under the National and California AAQS (CARB 2019).

- **Sulfur Dioxide** is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It enters the atmosphere as a result of burning high-sulfur-content fuel oils and coal and chemical processes at plants and refineries. Gasoline and natural gas have very low sulfur content and do not release significant quantities of SO₂. When sulfur dioxide forms sulfates (SO₄) in the atmosphere, together these pollutants are referred to as sulfur oxides (SO_X). Thus, SO₂ is both a primary and secondary criteria air pollutant. At sufficiently high concentrations, SO₂ may irritate the upper respiratory tract. Current scientific evidence links short-term exposures to SO₂, ranging from 5 minutes to 24 hours, with an array of adverse respiratory effects, including bronchoconstriction and increased asthma symptoms. These effects are particularly adverse for asthmatics at elevated ventilation rates (e.g., while exercising or playing) at lower concentrations and when combined with particulates, SO₂ may do greater harm by injuring lung tissue. Studies also show a connection between short-term exposure and increased visits to emergency facilities and hospital admissions for respiratory illnesses, particularly in at-risk populations such as children, the elderly, and asthmatics (South Coast AQMD 2005; USEPA 2021a). The SoCAB is designated attainment under the California and National AAQS (CARB 2019).
- **Suspended Particulate Matter** consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized and regulated. Inhalable coarse particles, or PM₁₀, include particulate matter with an aerodynamic diameter of 10 microns or less (i.e., \leq 10 millionths of a meter or 0.0004 inch). Inhalable fine particles, or PM_{2.5}, have an aerodynamic diameter of 2.5 microns or less (i.e., \leq 2.5 millionths of a meter or 0.0001 inch). Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. Both PM₁₀ and PM_{2.5} may adversely affect the human respiratory system, especially in people who are naturally sensitive or susceptible to breathing problems. The US Environmental Protection Agency's (EPA) scientific review concluded that PM_{2.5}, which penetrates deeply into the lungs, is more likely than PM₁₀ to contribute to health effects and at far lower concentrations. These health effects include premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms (e.g., irritation of the airways, coughing, or difficulty breathing) (South Coast AQMD 2005). There has been emerging evidence that ultrafine particulates, which are even smaller particulates with an aerodynamic diameter of <0.1 micron or less (i.e., \leq 0.1 millionths of a meter or <0.000004 inch), have human health implications because their toxic components may initiate or facilitate biological processes that may lead to adverse effects to the heart, lungs, and other organs (South Coast AQMD 2013). However, the EPA and the California Air Resources Board (CARB) have not adopted AAQS to regulate these particulates. Diesel particulate matter is classified by CARB as a carcinogen (CARB

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1998). Particulate matter can also cause environmental effects such as visibility impairment,¹ environmental damage,² and aesthetic damage³ (South Coast AQMD 2005; USEPA 2021a). The SoCAB is a nonattainment area for PM_{2.5} under California and National AAQS and a nonattainment area for PM₁₀ under the California AAQS (CARB 2019).⁴

- **Ozone**, or O₃, is a key ingredient of “smog” and is a gas that is formed when VOCs and NO_x, both by-products of internal combustion engine exhaust, undergo photochemical reactions in sunlight. O₃ is a secondary criteria air pollutant. O₃ concentrations are generally highest during the summer months when direct sunlight, light winds, and warm temperatures create favorable conditions for its formation. O₃ poses a health threat to those who already suffer from respiratory diseases as well as to healthy people. Breathing O₃ can trigger a variety of health problems, including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level O₃ also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. O₃ also affects sensitive vegetation and ecosystems, including forests, parks, wildlife refuges, and wilderness areas. In particular, O₃ harms sensitive vegetation during the growing season (South Coast AQMD 2005; USEPA 2021a). The SoCAB is designated extreme nonattainment under the California AAQS (1-hour and 8-hour) and National AAQS (8-hour) (CARB 2019).
- **Volatile Organic Compounds** are composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of VOCs. Other sources include evaporative emissions from paints and solvents, asphalt paving, and household consumer products such as aerosols (South Coast AQMD 2005). There are no AAQS for VOCs. However, because they contribute to the formation of O₃, South Coast AQMD has established a significance threshold. The health effects for ozone are described above.
- **Lead** is a metal found naturally in the environment as well as in manufactured products. Once taken into the body, lead distributes throughout the body in the blood and accumulates in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. Lead exposure also affects the oxygen-carrying capacity of the blood. The effects of lead most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ (South Coast AQMD 2005; USEPA 2021a). The major sources of lead emissions have historically been mobile and industrial sources. As a

¹ PM_{2.5} is the main cause of reduced visibility (haze) in parts of the United States.

² Particulate matter can be carried over long distances by wind and then settle on ground or water, making lakes and streams acidic; changing the nutrient balance in coastal waters and large river basins; depleting the nutrients in soil; damaging sensitive forests and farm crops; and affecting the diversity of ecosystems.

³ Particulate matter can stain and damage stone and other materials, including culturally important objects such as statues and monuments.

⁴ CARB approved the South Coast AQMD’s request to redesignate the SoCAB from serious nonattainment for PM₁₀ to attainment for PM₁₀ under the National AAQS on March 25, 2010, because the SoCAB did not violate federal 24-hour PM₁₀ standards from 2004 to 2007. The EPA approved the State of California’s request to redesignate the South Coast PM₁₀ nonattainment area to attainment of the PM₁₀ National AAQS, effective on July 26, 2013.

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result of the EPA's regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector dramatically declined by 95 percent between 1980 and 1999, and levels of lead in the air decreased by 94 percent between 1980 and 1999. Today, the highest levels of lead in air are usually found near lead smelters. The major sources of lead emissions today are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. However, in 2008 the EPA and CARB adopted more strict lead standards, and special monitoring sites immediately downwind of lead sources recorded very localized violations of the new state and federal standards.⁵ As a result of these violations, the Los Angeles County portion of the SoCAB is designated nonattainment under the National AAQS for lead (South Coast AQMD 2012; CARB 2019). There are no lead-emitting sources associated with the Modified Project, and therefore lead is not a pollutant of concern for the Modified Project.

Table 5.2-1 summarizes the potential health effects of criteria air pollutants.

Table 5.2-1 Criteria Air Pollutant Health Effects Summary

Pollutant	Health Effects	Examples of Sources
Carbon Monoxide (CO)	<ul style="list-style-type: none">• Chest pain in heart patients• Headaches, nausea• Reduced mental alertness• Death at very high levels	<ul style="list-style-type: none">• Any source that burns fuel such as cars, trucks, construction and farming equipment, and residential heaters and stoves
Ozone (O ₃)	<ul style="list-style-type: none">• Cough, chest tightness• Difficulty taking a deep breath• Worsened asthma symptoms• Lung inflammation	<ul style="list-style-type: none">• Atmospheric reaction of organic gases with nitrogen oxides in sunlight
Nitrogen Dioxide (NO ₂)	<ul style="list-style-type: none">• Increased response to allergens• Aggravation of respiratory illness	<ul style="list-style-type: none">• Same as carbon monoxide sources
Particulate Matter (PM ₁₀ & PM _{2.5})	<ul style="list-style-type: none">• Hospitalizations for worsened heart diseases• Emergency room visits for asthma• Premature death	<ul style="list-style-type: none">• Cars and trucks (particularly diesels)• Fireplaces and woodstoves• Windblown dust from overlays, agriculture, and construction
Sulfur Dioxide (SO ₂)	<ul style="list-style-type: none">• Aggravation of respiratory disease (e.g., asthma and emphysema)• Reduced lung function	<ul style="list-style-type: none">• Combustion of sulfur-containing fossil fuels, smelting of sulfur-bearing metal ores, and industrial processes
Lead (Pb)	<ul style="list-style-type: none">• Behavioral and learning disabilities in children• Nervous system impairment	<ul style="list-style-type: none">• Contaminated soil

Source: CARB 2009; South Coast AQMD 2005.

⁵ Source-oriented monitors record concentrations of lead at lead-related industrial facilities in the SoCAB, which include Exide Technologies in the City of Commerce; Quemetco, Inc. in the City of Industry; Trojan Battery Company in Santa Fe Springs; and Exide Technologies in Vernon. Monitoring conducted between 2004 through 2007 showed that the Trojan Battery Company and Exide Technologies exceed the federal standards (South Coast AQMD 2012).

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Toxic Air Contaminants

People exposed to toxic air pollutants (TACs) at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2021b). By the December 1999 update to the TAC list, CARB had designated 244 compounds as TACs (CARB 1999). Subsequently, the list was updated in 2007 to include Environmental Tobacco Smoke (CARB 2021b). Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. There are no air quality standards for TACs. Instead, TAC impacts are evaluated by calculating the health risks associated with a given exposure. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most relevant to the project being particulate matter from diesel-fueled engines.

In 1998, CARB identified diesel particulate matter (DPM) as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particles are 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs. Long-term (chronic) inhalation of DPM is likely a lung cancer risk. Short-term (i.e., acute) exposure can cause irritation and inflammatory responses and may exacerbate existing allergies and asthma (USEPA 2002).

5.2.1.1 REGULATORY BACKGROUND

AAQS have been adopted at the state and federal levels for criteria air pollutants. In addition, both the state and federal government regulate the release of TACs. The Modified Project is in the SoCAB and is subject to the rules and regulations imposed by the South Coast AQMD as well as the California AAQS adopted by CARB and National AAQS adopted by the EPA. Federal, state, regional, and local laws, regulations, plans, or guidelines that are potentially applicable to the Modified Project are summarized in this section.

Federal and State

Ambient Air Quality Standards

The Clean Air Act was passed in 1963 by the US Congress and has been amended several times. The 1970 Clean Air Act amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for areas not meeting National AAQS and the Prevention of Significant Deterioration program. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States. The Clean Air Act allows states to adopt more stringent standards or to include other pollution species. The California Clean Air Act, signed into law in 1988, requires all areas of the state to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tend to be more restrictive than the National AAQS.

The National and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect “sensitive receptors” most susceptible

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to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Both California and the federal government have established health-based AAQS for seven air pollutants, which are shown in Table 5.2-2. These pollutants are ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), and lead (Pb). In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

Table 5.2-2 Ambient Air Quality Standards for Criteria Air Pollutants

Pollutant	Averaging Time	California Standard ¹	Federal Primary Standard ²	Major Pollutant Sources
Ozone (O_3) ³	1 hour	0.09 ppm	*	Motor vehicles, paints, coatings, and solvents.
	8 hours	0.070 ppm	0.070 ppm	
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm	
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm	0.053 ppm	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.18 ppm	0.100 ppm	
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	*	0.030 ppm	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	0.075 ppm	
	24 hours	0.04 ppm	0.14 ppm	
Respirable Coarse Particulate Matter (PM_{10})	Annual Arithmetic Mean	20 $\mu g/m^3$	*	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	50 $\mu g/m^3$	150 $\mu g/m^3$	
Respirable Fine Particulate Matter ($PM_{2.5}$) ⁴	Annual Arithmetic Mean	12 $\mu g/m^3$	12 $\mu g/m^3$	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	*	35 $\mu g/m^3$	

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Table 5.2-2 Ambient Air Quality Standards for Criteria Air Pollutants

Pollutant	Averaging Time	California Standard ¹	Federal Primary Standard ²	Major Pollutant Sources
Lead (Pb)	30-Day Average	1.5 µg/m ³	*	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarter	*	1.5 µg/m ³	
	Rolling 3-Month Average	*	0.15 µg/m ³	
Sulfates (SO ₄) ⁵	24 hours	25 µg/m ³	*	Industrial processes.
Visibility Reducing Particles	8 hours	ExCo =0.23/km; visibility of 10≥ miles ⁶	No Federal Standard	Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt.
Hydrogen Sulfide	1 hour	0.03 ppm	No Federal Standard	Hydrogen sulfide (H ₂ S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas, and can be emitted as the result of geothermal energy exploitation.
Vinyl Chloride	24 hours	0.01 ppm	No Federal Standard	Vinyl chloride (chloroethene), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.

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Table 5.2-2 Ambient Air Quality Standards for Criteria Air Pollutants

Pollutant	Averaging Time	California Standard ¹	Federal Primary Standard ²	Major Pollutant Sources
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Source: CARB 2016.

Notes: ppm: parts per million; $\mu\text{g}/\text{m}^3$: micrograms per cubic meter

* Standard has not been established for this pollutant/duration by this entity.

¹ California standards for O₃, CO (except 8-hour Lake Tahoe), SO₂ (1 and 24 hour), NO₂, and particulate matter (PM₁₀, PM_{2.5}, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

² National standards (other than O₃, PM, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The O₃ standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu\text{g}/\text{m}^3$ is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

³ On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

⁴ On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 $\mu\text{g}/\text{m}^3$ to 12.0 $\mu\text{g}/\text{m}^3$. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 $\mu\text{g}/\text{m}^3$, as was the annual secondary standard of 15 $\mu\text{g}/\text{m}^3$. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 $\mu\text{g}/\text{m}^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

⁵ On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. The 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

⁶ Statewide VRP Standard (except Lake Tahoe Air Basin): Particles in sufficient amount to produce an extinction coefficient of 0.23 per kilometer when the relative humidity is less than 70 percent. This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

California has also adopted a host of regulations that reduce criteria pollutant emissions:

- **AB 1493: Pavley Fuel Efficiency Standards.** Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016. In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025.
- **SB 1078 and SB 107: Renewables Portfolio Standards.** A major component of California's Renewable Energy Program is the renewables portfolio standard (RPS) established under Senate Bills 1078 (Sher) and 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010.
- **California Code of Regulations (CCR), Title 20: Appliance Energy Efficiency Standards.** The 2006 Appliance Efficiency Regulations (20 CCR §§ 1601–1608) were adopted by the California Energy Commission (CEC) on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances.
- **24 CCR, Part 6: Building and Energy Efficiency Standards.** Energy conservation standards for new residential and nonresidential buildings adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977.

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- **24 CCR, Part 11: Green Building Standards Code.** Establishes planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.⁶

Tanner Air Toxics Act and Air Toxics Hot Spot Information and Assessment Act

Public exposure to TACs is a significant environmental health issue in California. In 1983, the California legislature enacted a program to identify the health effects of TACs and reduce exposure to them. The California Health and Safety Code defines a TAC as “an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health” (17 CCR § 93000). A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal Clean Air Act (42 US Code § 7412[b]) is a toxic air contaminant. Under state law, the California Environmental Protection Agency, acting through CARB, is authorized to identify a substance as a TAC if it is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through AB 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics “Hot Spot” Information and Assessment Act of 1987). The Tanner Air Toxics Act set up a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an “airborne toxics control measure” for sources that emit that TAC. If there is a safe threshold for a substance (i.e., a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate “toxics best available control technology” to minimize emissions. To date, CARB has established formal control measures for 11 TACs that are identified as having no safe threshold.

Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High priority facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public through notices and public meetings.

CARB has promulgated the following specific rules to limit TAC emissions:

- **13 CCR Chapter 10 § 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.** Generally restricts on-road diesel-powered commercial motor vehicles with a gross vehicle weight rating of greater than 10,000 pounds from idling more than five minutes.
- **13 CCR Chapter 10 § 2480: Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools.** Generally restricts a school bus or transit bus from idling for more than five minutes when within 100 feet of a school.

⁶ The green building standards became mandatory in the 2010 edition of the code.

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- **13 CCR § 2477 and Article 8: Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate.** Regulations established to control emissions associated with diesel-powered TRUs.

Regional

Air Quality Management Planning

South Coast AQMD is the agency responsible for improving air quality in the SoCAB and ensuring that the National and California AAQS are attained and maintained. South Coast AQMD is responsible for preparing the air quality management plan (AQMP) for the SoCAB in coordination with the Southern California Association of Governments (SCAG). Since 1979, a number of AQMPs have been prepared.

2016 AQMP

On March 3, 2017, South Coast AQMD adopted the 2016 AQMP as an update to the 2012 AQMP. The 2016 AQMP addresses strategies and measures to attain the following National AAQS:

- 2008 National 8-hour ozone standard by 2031
- 2012 National annual PM_{2.5} standard by 2025⁷
- 2006 National 24-hour PM_{2.5} standard by 2019
- 1997 National 8-hour ozone standard by 2023
- 1979 National 1-hour ozone standard by year 2022

It is projected that total NO_x emissions in the SoCAB would need to be reduced to 150 tons per day (tpd) by year 2023 and to 100 tpd in year 2031 to meet the 1997 and 2008 federal 8-hour ozone standards. The strategy to meet the 1997 federal 8-hour ozone standard would also lead to attaining the 1979 federal 1-hour ozone standard by year 2022 (South Coast AQMD 2017), which requires reducing NO_x emissions in the SoCAB to 250 tpd. This is approximately 45 percent more reduction from existing regulations for the 2023 ozone standard, and 55 percent more reduction from existing regulations to meet the 2031 ozone standard.

Reducing NO_x emissions would also reduce PM_{2.5} concentrations in the SoCAB. However, because the goal is to meet the 2012 federal annual PM_{2.5} standard no later than year 2025, South Coast AQMD is seeking to reclassify the SoCAB from “moderate” to “serious” nonattainment under this federal standard. A “moderate” nonattainment would require meeting the 2012 federal standard by no later than 2021.

Overall, the 2016 AQMP is composed of stationary and mobile-source emission reductions from regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile-source strategies, and reductions from federal sources such as aircraft, locomotives, and ocean-going vessels. Strategies outlined in the 2016 AQMP would be implemented in collaboration between CARB and the EPA (South Coast AQMD 2017).

⁷ The 2016 AQMP requests a reclassification from moderate to serious nonattainment for the 2012 National PM_{2.5} standard.

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Lead Implementation Plan

In 2008, the EPA designated the Los Angeles County portion of the SoCAB as a nonattainment area under the federal lead classification due to the addition of source-specific monitoring under the new federal regulation. This designation was based on two source-specific monitors in the City of Vernon and the City of Industry that exceeded the new standard in the 2007-to-2009 period. The remainder of the SoCAB outside the Los Angeles County nonattainment area remains in attainment of the new 2008 lead standard. On May 24, 2012, CARB approved the State Implementation Plan (SIP) revision for the federal lead standard, which the EPA revised in 2008. Lead concentrations in this nonattainment area have been below the level of the federal standard since December 2011. The SIP revision was submitted to the EPA for approval.

South Coast AQMD Rules and Regulations

All projects are subject to South Coast AQMD rules and regulations in effect at the time of activity, including:

- **Rule 401, Visible Emissions.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in visible emissions. Specifically, the rule prohibits the discharge of any air contaminant into the atmosphere by a person from any single source of emission for a period or periods aggregating more than three minutes in any one hour that is as dark as or darker than designated No. 1 on the Ringelmann Chart, as published by the US Bureau of Mines.
- **Rule 402, Nuisance.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in a public nuisance. Specifically, this rule prohibits any person from discharging quantities of air contaminants or other material from any source such that it would result in an injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. Additionally, the discharge of air contaminants would also be prohibited where it would endanger the comfort, repose, health, or safety of any number of persons or the public, or that cause or have a natural tendency to cause injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403, Fugitive Dust.** This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust and requires best available control measures to be applied to earth-moving and grading activities. In general, the rule prohibits new developments from the installation of wood-burning devices.
- **Rule 445, Wood Burning Devices.** This rule is intended to reduce the emission of particulate matter from wood-burning devices and applies to manufacturers and sellers of wood-burning devices, commercial sellers of firewood, and property owners and tenants that operate a wood-burning device.
- **Rule 1113, Architectural Coatings.** This rule serves to limit the VOC content of architectural coatings used on projects in the SoCAB. Any person who supplies, sells, offers for sale, or manufactures any

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architectural coating for use on projects in the SoCAB must comply with the current VOC standards set in this rule.

- **Rule 1403, Asbestos Emissions from Demolition/Renovation Activities.** The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials. All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

5.2.1.2 EXISTING CONDITIONS

The Modified Project site is in the SoCAB, which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SoCAB is in a coastal plain with connecting broad valleys and low hills and is bounded by the Pacific Ocean in the southwest quadrant, with high mountains forming the remainder of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. This usually mild weather pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds (South Coast AQMD 2005).

Meteorology

Temperature and Precipitation

The annual average temperature varies little throughout the SoCAB, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The climatological station nearest to the project site with temperature data is the Elsinore Monitoring Station (ID No. 042805). The lowest average temperature is reported at 36.4°F in January, and the highest average temperature is 98.1°F in August (WRCC 2021).

In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from October through April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains. Rainfall historically averages 12.01 inches per year in the project area (WRCC 2021).

Humidity

Although the SoCAB has a semiarid climate, the air near the earth's surface is typically moist because of a shallow marine layer. This "ocean effect" is dominant except for infrequent periods when dry, continental air is brought into the SoCAB by offshore winds. Periods of heavy fog are frequent, especially along the coast. Low clouds, often referred to as high fog, are a characteristic climatic feature. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SoCAB (South Coast AQMD 1993).

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Wind

Wind patterns across the southern coastal region are characterized by westerly or southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Wind speed is somewhat greater during the dry summer months than during the rainy winter season.

Between periods of wind, periods of air stagnation may occur in the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall months, surface high-pressure systems over the SoCAB combined with other meteorological conditions can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east inhibit the eastward transport and diffusion of pollutants. Air quality in the SoCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions (South Coast AQMD 2005).

Inversions

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two distinct types of temperature inversions control the vertical depth through which pollutants are mixed. These inversions are the marine/subsidence inversion and the radiation inversion. The height of the base of the inversion at any given time is known as the “mixing height.” The combination of winds and inversions are critical determinants in leading to the highly degraded air quality in summer and the generally good air quality in the winter in the project area (South Coast AQMD 2005).

SoCAB Nonattainment Areas

The AQMP provides the framework for air quality basins to achieve attainment of the state and federal ambient air quality standards through the SIP. Areas are classified as attainment or nonattainment areas for particular pollutants depending on whether they meet the AAQS. Severity classifications for ozone nonattainment range in magnitude from marginal, moderate, and serious to severe and extreme.

- ***Unclassified.*** A pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.
- ***Attainment.*** A pollutant is in attainment if the AAQS for that pollutant was not violated at any site in the area during a three-year period.
- ***Nonattainment.*** A pollutant is in nonattainment if there was at least one violation of an AAQS for that pollutant in the area.
- ***Nonattainment/Transitional.*** A subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the AAQS for that pollutant.

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The attainment status for the SoCAB is shown in Table 5.2-3.

Table 5.2-3 Attainment Status of Criteria Air Pollutants in the South Coast Air Basin

Pollutant	State	Federal
Ozone – 1-hour	Extreme Nonattainment	No Federal Standard
Ozone – 8-hour	Extreme Nonattainment	Extreme Nonattainment
PM ₁₀	Serious Nonattainment	Attainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Attainment
NO ₂	Attainment	Attainment/Maintenance
SO ₂	Attainment	Attainment
Lead	Attainment	Nonattainment (Los Angeles County only) ¹
All others	Attainment/Unclassified	Attainment/Unclassified

Source: CARB 2019.

¹ In 2010, the Los Angeles portion of the SoCAB was designated nonattainment for lead under the new 2008 federal AAQS as a result of large industrial emitters. Remaining areas in the SoCAB are unclassified.

Multiple Air Toxics Exposure Study IV

The Multiple Air Toxics Exposure Study (MATES) is a monitoring and evaluation study on existing ambient concentrations of TACs and the potential health risks from air toxics in the SoCAB. In 2008, South Coast AQMD conducted its third update, MATES III, based on the Office of Environmental Health Hazards Assessment's (OEHHA) 2003 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (2003 HRA Guidance Manual). The results showed that the overall risk for excess cancer from a lifetime exposure to ambient levels of air toxics was about 1,200 in a million. The largest contributor to this risk was diesel exhaust, which accounted for 84 percent of the cancer risk (South Coast AQMD 2008a).

South Coast AQMD recently released the fourth update, MATES IV, which was also based on OEHHA's 2003 HRA Guidance Manual. The results showed that the overall monitored risk for excess cancer from a lifetime exposure to ambient levels of air toxics decreased to approximately 418 in one million. Compared to the 2008 MATES III, monitored excess cancer risks decreased by approximately 65 percent. Approximately 90 percent of the risk is attributed to mobile sources, and 10 percent is attributed to TACs from stationary sources, such as refineries, metal processing facilities, gas stations, and chrome-plating facilities. The largest contributor to this risk was diesel exhaust, which accounted for approximately 68 percent of the air toxics risk. Compared to MATES III, MATES IV found substantial improvement in air quality and associated decrease in air toxics exposure. As a result, the estimated basinwide, population-weighted risk decreased by approximately 57 percent since MATES III (South Coast AQMD 2015a).

OEHHA updated the guidelines for estimating cancer risks on March 6, 2015 (OEHHA 2015). The new method uses higher estimates of cancer potency during early life exposures, which result in a higher calculation of risk. There are also differences in the assumptions on breathing rates and length of residential exposures. When combined, South Coast AQMD estimates that risks for a given inhalation exposure level will be about 2.7 times higher than the risk identified in MATES IV using the 2015 OEHHA guidance methodology (e.g., 2.7 times higher than 418 in one million overall excess cancer risk) (South Coast AQMD 2015a).

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Existing Ambient Air Quality

Existing levels of ambient air quality and historical trends and projections in the vicinity of the Modified Project site are best documented by measurements taken by the South Coast AQMD. The Modified Project site is located within Source Receptor Area (SRA) 25 – Lake Elsinore.⁸ The air quality monitoring station closest to the project site is the Lake Elsinore-W Flint Monitoring Station, which is one of 31 monitoring stations South Coast AQMD operates and maintains within the SoCAB.⁹ Data from this station includes O₃, NO_x, and PM₁₀ and PM_{2.5} and is summarized in Table 5.2-4. The data show regular violations of the state and federal O₃, state PM₁₀, and federal PM_{2.5} standards in the last five years.

⁸ Per South Coast AQMD Rule 701, an SRA is defined as: “A source area is that area in which contaminants are discharged and a receptor area is that area in which the contaminants accumulate and are measured. Any of the areas can be a source area, a receptor area, or both a source and receptor area.” There are 37 SRAs in the South Coast AQMD’s jurisdiction.

⁹ Locations of the SRAs and monitoring stations are shown here: <http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf>.

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Table 5.2-4 Ambient Air Quality Monitoring Summary

Pollutant/Standard	Number of Days Thresholds Were Exceeded and Maximum Levels				
	2015	2016	2017	2018	2019
Ozone (O₃)					
State 1-Hour ≥ 0.09 ppm (days exceed threshold)	18	15	23	16	4
State 8-hour ≥ 0.07 ppm (days exceed threshold)	31	44	54	30	28
Federal 8-Hour > 0.075 ppm (days exceed threshold)	19	25	35	26	11
Max. 1-Hour Conc. (ppm)	0.131	0.124	0.121	0.116	0.108
Max. 8-Hour Conc. (ppm)	0.093	0.093	0.098	0.095	0.089
Nitrogen Dioxide (NO₂)					
State 1-Hour ≥ 0.18 ppm (days exceed threshold)	0	0	0	0	0
Federal 1-Hour ≥ 0.100 ppm (days exceed threshold)	0	0	0	0	0
Max. 1-Hour Conc. (ppb)	0.0472	0.0513	0.0490	0.0413	0.0380
Coarse Particulates (PM₁₀)					
State 24-Hour > 50 µg/m ³ (days exceed threshold)	*	*	*	*	*
Federal 24-Hour > 150 µg/m ³ (days exceed threshold)	0	0	0	0	0
Max. 24-Hour Conc. (µg/m ³)	90.7	99.7	134.1	105.3	93.8
Fine Particulates (PM_{2.5})					
Federal 24-Hour > 35 µg/m ³ (days exceed threshold)	*	*	*	*	*
Max. 24-Hour Conc. (µg/m ³)	41.7	31.5	27.2	31.3	17.6

Source: CARB 2021a.

Notes: ppm = parts per million; ppb = parts per billion; µg/m³ = micrograms per cubic meter; * = Data not available

Data obtained from the Lake Elsinore-W Flint Monitoring Station.

Existing Emissions

The project site is within Planning Area 2 of the Original Project and is currently vacant and does not generate criteria air pollutant emissions from area sources, energy use, or mobile sources. As shown in Figure 1-2, *Aerial Photograph*, the project site is vacant and contains ruderal vegetation. The project site is bound by Planning Area 1 (multi-family residential) to the north, Planning Area 3 and Inland Valley Drive to the east, and Planning Area 3 (open space) to the south and west. The entire 48.15-acre Oak Springs Ranch Specific Plan Area is bound by Clinton Keith Road to the north, Inland Valley Drive to the east, Inland Medical Center and I-15 to the south, and Oak Springs Road to the west. Uses surrounding the Oak Springs Ranch Specific Plan Area include vacant land to the northeast and east; commercial uses to the southeast, west, and north; and Inland Valley Medical Center and I-15 to the south. The residential land uses in Planning Area 1 currently generate criteria air pollutant emissions from area sources, energy use, and mobile sources.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases.

Residential areas are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Other sensitive receptors include retirement facilities, hospitals, and schools. Recreational land uses are

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considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent because the majority of the workers tend to stay indoors most of the time. In addition, the workforce is generally the healthiest segment of the population. The nearest off-site sensitive receptors include residents in Planning Area 1 to the north of the Modified Project site on the southwest corner of Clinton Keith Road and Inland Valley Drive. Other affected sensitive receptors include patients and employees of the Inland Valley Medical Center, south of the project site as well as the off-site residences to the northwest and southeast of the site along Depasquale Road and Yamas Drive, respectively.

5.2.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- AQ-1 Conflict with or obstruct implementation of the applicable air quality plan.
- AQ-2 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.
- AQ-3 Expose sensitive receptors to substantial pollutant concentrations.
- AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

5.2.2.1 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT THRESHOLDS

Regional Significance Thresholds

South Coast AQMD has adopted regional construction and operational emissions thresholds to determine a project's cumulative impact on air quality in the SoCAB, shown in Table 5.2-5. The table lists thresholds that are applicable for all projects uniformly, regardless of size or scope. There is growing evidence that although ultrafine particulate matter contributes a very small portion of the overall atmospheric mass concentration, it represents a greater proportion of the health risk from PM. However, the EPA and CARB have not adopted AAQS to regulate ultrafine particulate matter; therefore, South Coast AQMD has not developed thresholds for it.

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Table 5.2-5 South Coast AQMD Significance Thresholds

Air Pollutant	Construction Phase	Operational Phase
Reactive Organic Gases (ROGs)/Volatile Organic Compounds (VOCs)	75 lbs/day	55 lbs/day
Nitrogen Oxides (NO _x)	100 lbs/day	55 lbs/day
Carbon Monoxide (CO)	550 lbs/day	550 lbs/day
Sulfur Oxides (SO _x)	150 lbs/day	150 lbs/day
Particulates (PM ₁₀)	150 lbs/day	150 lbs/day
Particulates (PM _{2.5})	55 lbs/day	55 lbs/day

Source: South Coast AQMD 2019.

Projects that exceed the regional significance threshold contribute to the nonattainment designation of the SoCAB. The attainment designations are based on the AAQS, which are set at levels of exposure that are determined to not result in adverse health effects. Exposure to fine particulate pollution and ozone causes myriad health impacts, particularly to the respiratory and cardiovascular systems:

- Increases cancer risk (PM_{2.5}, TACs)
- Aggravates respiratory disease (O₃, PM_{2.5})
- Increases bronchitis (O₃, PM_{2.5})
- Causes chest discomfort, throat irritation, and increased effort to take a deep breath (O₃)
- Reduces resistance to infections and increases fatigue (O₃)
- Reduces lung growth in children (PM_{2.5})
- Contributes to heart disease and heart attacks (PM_{2.5})
- Contributes to premature death (O₃, PM_{2.5})
- Contributes to lower birth weight in newborns (PM_{2.5}) (South Coast AQMD 2015b)

Exposure to fine particulates and ozone aggravates asthma attacks and can amplify other lung ailments such as emphysema and chronic obstructive pulmonary disease. Exposure to current levels of PM_{2.5} is responsible for an estimated 4,300 cardiopulmonary-related deaths per year in the SoCAB. In addition, University of Southern California scientists, in a landmark children's health study, found that lung growth improved for children aged 11 to 15 in five communities in the SoCAB as air pollution declined (South Coast AQMD 2015b).

South Coast AQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals exposed to elevated concentrations of air pollutants in the SoCAB and has established thresholds that would be protective of these individuals. To achieve the health-based standards established by the EPA, South Coast AQMD prepared an AQMP that details regional programs to attain the AAQS. Mass emissions in Table 5.2-5 are not correlated with concentrations of air pollutants but contribute to the cumulative air quality impacts in the SoCAB. The thresholds are based on the trigger levels for the federal New Source Review (NSR) Program. The NSR Program was created to ensure projects are consistent with attainment of health-based federal AAQS. Regional emissions from a single project do not single-handedly trigger a regional health impact, and it is speculative to identify how many more individuals in the air basin would be affected by the health effects listed above. Projects that do not exceed the South Coast AQMD regional significance thresholds in

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Table 5.2-5 would not violate any air quality standards or contribute substantially to an existing or projected air quality violation.

If projects exceed the emissions in Table 5.2-5, emissions would cumulatively contribute to the nonattainment status and would contribute to elevating health effects associated with these criteria air pollutants. Known health effects related to ozone include worsening of bronchitis, asthma, and emphysema and a decrease in lung function. Health effects associated with particulate matter include premature death of people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, decreased lung function, and increased respiratory symptoms. Reducing emissions would further contribute to reducing possible health effects related to criteria air pollutants. However, for projects that exceed the emissions in Table 5.2-5, it is speculative to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment since mass emissions are not correlated with concentrations of emissions or how many additional individuals in the air basin would be affected by the health effects cited above.

South Coast AQMD has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health in order to address the issue raised in *Sierra Club v. County of Fresno* (Friant Ranch, L.P.) (2018) 6 Cal.5th 502, Case No. S21978. Ozone concentrations are dependent upon a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Because of the complexities of predicting ground-level ozone concentrations in relation to the National AAQS and California AAQS, it is not possible to link health risks to the magnitude of emissions exceeding the significance thresholds. However, if a project in the SoCAB exceeds the regional significance thresholds, the project could contribute to an increase in health effects in the basin until the attainment standards are met in the SoCAB.

CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. With the turnover of older vehicles and introduction of cleaner fuels, as well as implementation of control technology on industrial facilities, CO concentrations in the SoCAB and the state have steadily declined.

In 2007, the SoCAB was designated in attainment for CO under both the California AAQS and National AAQS. The CO hotspot analysis conducted for the attainment by South Coast AQMD did not predict a violation of CO standards at the busiest intersections in Los Angeles during the peak morning and afternoon periods.¹⁰ As identified in South Coast AQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SoCAB in years before redesignation were a

¹⁰ The four intersections were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning peak hour and LOS F in the evening peak hour.

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result of unusual meteorological and topographical conditions and not of congestion at a particular intersection. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (BAAQMD 2017).¹¹

Localized Significance Thresholds

South Coast AQMD identifies localized significance thresholds (LST), shown in Table 5.2-6. Emissions of NO₂, CO, PM₁₀, and PM_{2.5} generated at a project site could expose sensitive receptors to substantial concentrations of criteria air pollutants. (Off-site mobile-source emissions are not included in the LST analysis.) A project would generate a significant impact if it generates emissions that, when added to the local background concentrations, violate the AAQS.

Table 5.2-6 South Coast AQMD Localized Significance Thresholds

Air Pollutant (Relevant AAQS)	Concentration
1-Hour CO Standard (CAAQS)	20 ppm
8-Hour CO Standard (CAAQS)	9.0 ppm
1-Hour NO ₂ Standard (CAAQS)	0.18 ppm
Annual NO ₂ Standard (CAAQS)	0.03 ppm
24-Hour PM ₁₀ Standard – Construction (South Coast AQMD) ¹	10.4 µg/m ³
24-Hour PM _{2.5} Standard – Construction (South Coast AQMD) ¹	10.4 µg/m ³
24-Hour PM ₁₀ Standard – Operation (South Coast AQMD) ¹	2.5 µg/m ³
24-Hour PM _{2.5} Standard – Operation (South Coast AQMD) ¹	2.5 µg/m ³
Annual Average PM ₁₀ Standard (South Coast AQMD) ¹	1.0 µg/m ³

Source: South Coast AQMD 2019.

ppm – parts per million; µg/m³ – micrograms per cubic meter

¹ Threshold is based on South Coast AQMD Rule 403. Since the SoCAB is in nonattainment for PM₁₀ and PM_{2.5}, the threshold is established as an allowable change in concentration. Therefore, background concentration is irrelevant.

To assist lead agencies, South Coast AQMD developed screening-level LSTs to back-calculate the mass amount (pounds per day) of emissions generated on-site that would trigger the levels shown in Table 5.2-6 for projects under five acres. These “screening-level” LST tables are the localized significance thresholds for all projects of five acres and less and are based on emissions over an 8-hour period; however, they can be used as screening criteria for larger projects to determine whether or not dispersion modeling may be required.

The screening-level LSTs in SRA 25 are shown in Table 5.2-7. For construction activities, LSTs are based on the acreage disturbed per day based on equipment use (South Coast AQMD 2011) up to the project site acreage. These LSTs reflect the thresholds for receptors within 82 feet (25 meters).

¹¹ The CO hotspot analysis refers to the modeling conducted by the Bay Area Air Quality Management District for its CEQA Guidelines because it is based on newer data and considers the improvement in mobile-source CO emissions. Although meteorological conditions in the Bay Area differ from those in the Southern California region, the modeling conducted by BAAQMD demonstrates that the net increase in peak hour traffic volumes at an intersection in a single hour would need to be substantial. This finding is consistent with the CO hotspot analysis South Coast AQMD prepared as part of its 2003 AQMP to provide support in seeking CO attainment for the SoCAB. Based on the analysis prepared by South Coast AQMD, no CO hotspots were predicted for the SoCAB. As noted in the preceding footnote, the analysis included some of Los Angeles’ busiest intersections, with daily traffic volumes of 100,000 or more peak hour vehicle trips operating at LOS E and F.

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Table 5.2-7 South Coast AQMD Screening-Level Localized Significance Thresholds – Construction Activities

Acreage Disturbed	Threshold (lbs/day)			
	Nitrogen Oxides (NO _x)	Carbon Monoxide (CO)	Coarse Particulates (PM ₁₀)	Fine Particulates (PM _{2.5})
≤1.00 Acre Disturbed Per Day	162	750	4.00	3.00
1.50 Acres Disturbed Per Day	198	925	5.50	3.50
2.00 Acres Disturbed Per Day	234	1,100	7.00	4.00
5.00 Acres Disturbed Per Day	371	1,965	12.99	8.00

Source: South Coast AQMD 2008a and 2011.

The screening-level LSTs are based on receptors within 82 feet (25 meters) in SRA 25.

Health Risk

Whenever a project would require use of chemical compounds that have been identified in South Coast AQMD Rule 1401, placed on CARB's air toxics list pursuant to AB 1807, or placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, a health risk assessment is required by the South Coast AQMD. Table 5.2-8 lists the TAC incremental risk thresholds for operation of a project. The purpose of this environmental evaluation is to identify the significant effects of the project on the environment, not the significant effects of the environment on the project. *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (Case No. S213478). However, the environmental document must analyze the impacts of environmental hazards on future users when a proposed project exacerbates an existing environmental hazard or condition. Residential, commercial, and office uses do not use substantial quantities of TACs and typically do not exacerbate existing hazards, so these thresholds are typically applied to new industrial projects.

Table 5.2-8 South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds

Maximum Incremental Cancer Risk	≥ 10 in 1 million
Cancer Burden (in areas ≥ 1 in 1 million)	> 0.5 excess cancer cases
Hazard Index (project increment)	≥ 1.0

Source: South Coast AQMD 2019.

5.2.3 The 2007 Approved Project (Original Project)

The 2007 EIR determined that the Original Project would be consistent with the South Coast AQMD's Air Quality Management Plan. In addition, the 2007 EIR determined that the Original Project would exceed emission thresholds during short-term site preparation and construction activities, even with incorporation of Mitigation Measures 5.2-2A and 5.2-2B. However, long-term operation under the Original Project would not exceed the applicable South Coast AQMD thresholds for criteria air pollutants. While the operation of the Original Project would not expose sensitive receptors to substantial pollutant concentrations, construction of the Original Project would result in a cumulatively considerable net increase of VOC, NO_x, and PM₁₀ even

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with incorporation of mitigation. Lastly, the Original Project would not create objectionable odors affecting a substantial number of people.

5.2.4 Applicable Mitigation Measures from the 2007 EIR

5.2.4.1 MITIGATION MEASURES

The following mitigation measures from the 2007 EIR would be applicable to the Modified Project. These mitigation measures have been incorporated into the Mitigation Monitoring Program for the Modified Project and have been modified as applicable to clarify the language and to reflect minor changes caused by the Modified Project. The following mitigation measures, from the 2007 EIR, would remain unchanged/unmodified:

- **Mitigation Measure 5.2-2A:** The property owner/developer shall implement standard mitigation measures in accordance with South Coast AQMD Rules 402 and 403 to control fugitive dust emissions and ensure that nuisance dust conditions do not occur during construction. In addition to the standard measures, the property owner/developer shall implement supplemental measures as feasible to reduce fugitive dust emissions to the extent feasible during construction operations, in addition to mitigation measures to reduce construction-related emissions of NO_x, PM₁₀, and VOCs. To assure compliance, the County shall verify compliance with these measures during normal construction site inspections. The measures to be implemented are listed below:
 - Apply soil stabilizers to inactive areas
 - Replace ground cover in disturbed areas quickly
 - Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph
 - Water the haul route and exposed surfaces three times per day
 - Use of construction equipment with low emission factors and high energy efficiency where possible
 - Perform regulatory scheduled engine maintenance (off-site) to minimize equipment emissions
 - Use of electric- or diesel-powered equipment rather than gasoline powered engines where feasible
- **Mitigation Measure 5.2-2B:** The developer shall use zero Volatile Organic Compounds (VOC) content architectural coatings during the construction of the project to the maximum extent feasible. Use of Zero-VOC paints assumes no more than 100 gram/liter of VOC.

5.2.4.2 PLANS, PROGRAMS, AND POLICIES

5.2.5 Environmental Impacts

5.2.5.1 METHODOLOGY

This air quality evaluation was prepared in accordance with the requirements of CEQA to determine if significant air quality impacts are likely to occur in conjunction with future development that would be accommodated by the Modified Project. South Coast AQMD's *CEQA Air Quality Handbook* (Handbook) and

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updates on its website are intended to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. The Handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs, and they were used in this analysis.

Air pollutant emissions are calculated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2.25. CalEEMod compiles an emissions inventory of construction (fugitive dust, off-gas emissions, on-road emissions, and off-road emissions), area sources, indirect emissions from energy use, mobile sources, indirect emissions from waste disposal (annual only), and indirect emissions from water/wastewater (annual only). Construction criteria air pollutant emissions modeling is included in Appendix 5.2-1 of this Draft SEIR. The calculated emissions of the project are compared to thresholds of significance for individual projects using the South Coast AQMD's Handbook. Following is a summary of the assumptions used for the Modified Project analysis.

Construction Phase

Construction would entail site preparation, rough grading and soil haul, utilities trenching and excavation, fine grading and soil haul, construction of the proposed structures and buildings, architectural coating, paving, and finishing and landscaping on the 12.89-acre Modified Project site. The Modified Project is anticipated to be constructed over a period of up to 24 months, from April 2022 to April 2024. Construction air pollutant emissions for the Modified Project are based on the preliminary information provided or verified by the City.

Operational Phase

- **Transportation:** The primary source of mobile criteria air pollutant emissions is tailpipe exhaust emissions from the combustion of fuel (i.e., gasoline and diesel). For particulate matter, brake and tire wear and fugitive dust are created by vehicles traveling roadways. The average daily trip (ADT) generation for the Original Project and Modified Project weekday trips were provided by Urban Crossroads (see Appendix 5.8-1). Saturday and Sunday trips were calculated based on the rates provided in the Institute of Transportation Engineers' Trip Generation Manual (10th edition) (ITE 2017). Project-related on-road criteria air pollutant emissions are based on calendar year 2024 emission rates from EMFAC2017 (v. 1.0.2) for the Modified Project buildout year.
- **Area Sources.** Area source emissions from use of consumer cleaning products, landscaping equipment, and VOC emissions from paints are based on CalEEMod default values for the square footage of the proposed buildings and surface parking lot areas to be coated for the Modified Project.
- **Energy:** Criteria air pollutant emissions from energy use (natural gas used for cooking, heating, etc.) are based on the CalEEMod defaults for natural gas usage for residential land uses. Criteria air pollutant emissions from energy use are associated with natural gas used for heating. Based on a study of the statewide impacts of the 2019 changes to the California Energy Efficiency Standards, the reductions for newly constructed single family and multifamily residential buildings are estimated to be 9 percent and 5 percent, respectively, for natural gas (NORESCO 2018).

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Plans, programs, and policies (PPP), including applicable regulatory requirements and conditions of approval for air quality impacts, are identified below.

PPP AIR-1 New buildings are required to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11). The 2019 Building and Energy Efficiency Standards became effective January 1, 2020. The Building Energy and Efficiency Standards and CALGreen are updated tri-annually with a goal to achieve zero net energy for residential buildings by 2020 and nonresidential buildings by 2030.

PPP AIR-2 New buildings are required to adhere to the California Green Building Standards Code (CALGreen) requirement to provide bicycle parking for new nonresidential buildings, or meet local bicycle parking ordinances, whichever is stricter (CALGreen Sections 5.106.4.1, 14.106.4.1, and 5.106.4.1.2).

PPP AIR-3 Construction activities will be conducted in compliance with California Code of Regulations Title 13 Section 2499, which requires that nonessential idling of construction equipment is restricted to five minutes or less.

PPP AIR-4 Construction activities will be conducted in compliance with any applicable South Coast Air Quality Management District rules and regulations, including but not limited to:

- Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance.
- Rule 402, Nuisance, which states that a project shall not “discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.”
- Rule 1113, which limits the volatile organic compound content of architectural coatings.

5.2.5.2 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.2-1: Would the Modified Project result in a cumulatively considerable net increase of criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard during construction activities? [Thresholds AQ-2]

Construction activities produce combustion emissions from various sources, such as on-site heavy-duty construction vehicles, vehicles hauling materials to and from the site, and motor vehicles transporting the

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construction crew. Construction of the Modified Project would generate criteria air pollutants associated with construction equipment exhaust and fugitive dust from site preparation, rough grading and soil haul, utilities trenching, excavation, fine grading and soil haul, building construction, architectural coating, pavement of asphalt and non-asphalt surfaces, and finishing and landscaping of the site. Air pollutant emissions from construction activities on-site would vary daily as construction activity levels change. An estimate of maximum daily construction emissions for the Modified Project is provided in Table 5.2-9.

The SoCAB is designated nonattainment for O₃ and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS,¹² and nonattainment for lead (Los Angeles County only) under the National AAQS. According to South Coast AQMD methodology, any project that does not exceed or can be mitigated to less than the daily threshold values would not add significantly to a cumulative impact (South Coast AQMD 1993). Construction emissions associated with the Original Project were found to be significant and unavoidable, even with incorporation of Mitigation Measure 5.2-2A and Mitigation Measure 5.2-2B. As shown in Table 5.2-9, the maximum daily emissions for VOC, CO, SO₂, PM₁₀, and PM_{2.5} from construction-related activities of the Modified Project would be less than their respective South Coast AQMD regional significance threshold values. However, the construction-related NO_x emissions generated from rough grading and soil hauling activities would exceed the South Coast AQMD regional significance threshold. Consequently, construction of the Modified Project could potentially contribute to the nonattainment designations of the SoCAB in the absence of mitigation. Therefore, construction of the Modified Project is conservatively deemed to have a new potentially significant impact as a result of the additional soil haul required.

Table 5.2-9 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lb/day) ^{1,2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Original Project						
Maximum Daily Construction Emissions with Mitigation ³	232	231	268	<1	83	NA
South Coast AQMD Regional Construction Threshold	75	100	550	150	150	55
Significant?	Yes	Yes	No	No	No	NA
Modified Project Year 2022						
Site Preparation	1	12	9	<1	3	2
Rough Grading	3	31	23	<1	5	3
Rough Grading and Soil Haul, Utilities Trenching	6	133	47	<1	18	7
Rough Grading Soil Haul and Utilities Trenching	3	102	24	<1	13	4
Utility Trenching	<1	3	5	<1	<1	<1
Excavation	3	31	23	<1	6	3
Excavation and Paving	5	42	39	<1	6	3

¹² Portions of the SoCAB along SR-60 in Los Angeles, Riverside, and San Bernardino counties are proposed nonattainment for NO₂ under the California AAQS.

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Excavation and Building Construction 2022	3	32	28	<1	6	3
Building Construction 2022	<1	2	4	<1	1	<1
Building Construction 2022 and Fine Grading	1	13	11	<1	1	1
Building Construction 2022, Fine Grading and Soil Haul	2	29	15	<1	3	1
Modified Project Year 2023						
Building Construction 2023	<1	2	4	<1	1	<1
Building Construction 2023 and Architectural Coating	27	3	7	<1	1	<1
Modified Project Year 2024						
Building Construction 2024	<1	1	4	<1	1	<1
Building Construction 2024 and Finishing/Landscaping	1	10	11	<1	1	1
Finishing/Landscaping	1	9	7	<1	<1	<1
Modified Project Maximum Daily Construction Emissions						
Maximum Daily Emissions (Modified Project)	26	133	47	1	18	7
South Coast AQMD Regional Construction Threshold	75	100	550	150	150	55
Significant?	No	Yes	No	No	No	No

Source: CalEEMod Version 2016.3.2.25

¹ Based on the preliminary information provided by the project applicant. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.

² Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403 as well as Mitigation Measures 5.2-2A and 5.2-2B, including watering disturbed areas a minimum of three times per day, using soil stabilizers, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.

³ Riverside County. 2007, May. Final Oaks Springs Ranch Specific Plan Environmental Impact Report. State Clearinghouse (SCH) # 2004071076.

Level of Significance Before Mitigation: Impact 5.2-1 would potentially significant.

Additional Mitigation Measures for the Modified Project

As identified in Table 5.2-9, both the Original Project and the Modified Project would exceed the significance thresholds for NO_x. Since Certification of the 2007 EIR, mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project. In this case, the Modified Project would require higher soil haul volumes that trigger elevated NOx impacts on a peak grading day. Therefore, the following mitigation measure has been added to reduce the Modified Project's significant impact.

AQ-1 During construction, the construction contractor(s) shall limit the hauling of soil generated from grading/excavation activities to a maximum of 140 trucks per day (1,350 one-way soil haul trips per day if 16 cubic yard trucks are used; or 675 one-way soil haul trips if double haul trucks with a 30 cubic yard capacity is used; and assuming a one-way haul distance of 65 miles). The developer is required to find an export site within a 65-mile radius, and if one cannot be located, then the truck trips per day will need to be reduced to ensure impacts remain less than significant. Haul trucks with engines that are 2010 or newer shall be used for soil hauling activities. These requirements shall be noted on all construction management plans

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and verified by the City of Wildomar Building & Safety Department prior to issuance of any construction permits and during the soil-disturbing phases.

Level of Significance After Mitigation: Impact 5.2-1 would be less than significant with mitigation incorporated (see Section 5.2-9, Level of Significance After Mitigation).

The Modified Project would not result in new or substantially more severe significant impacts.

Impact 5.2-2: Would the Modified Project result in a cumulatively considerable net increase of criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard during long-term operational activities? [Thresholds AQ-2]

Operational emissions associated with the Original Project would not exceed the South Coast AQMD regional thresholds of significance and the potential impacts were found to be less than significant. Buildout of the Modified Project would result in new multifamily residences and associated amenities that would generate an increase in criteria air pollutant emissions from transportation (i.e., vehicle trips), area sources (e.g., landscaping equipment, architectural coating), and energy (i.e., natural gas used for heating and cooking). As shown in Table 5.2-10, the maximum daily operation emissions would be less than their respective South Coast AQMD regional significance threshold values. Projects that do not exceed the South Coast AQMD regional significance thresholds do not result in an incremental increase in health impacts in the SoCAB from project-related increases in criteria air pollutants. Impacts to the regional air quality associated with operation of the project would be less than significant. Thus, the Modified Project would not result in new or substantially more severe significant impacts in this regard.

Table 5.2-10 Maximum Daily Regional Operation Emissions

Source	Maximum Daily Emissions (lbs/Day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Original Project¹						
Maximum Daily Emissions	55	41	388	<1	33	NA
South Coast AQMD Regional Threshold	55	55	550	150	150	550
Exceeds Threshold?	No	No	No	No	No	No
Modified Project						
Area	7	<1	24	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile ²	5	4	50	<1	17	5
Maximum Daily Regional Emissions	12	5	74	<1	17	5
Comparison of the Modified Project to the Original Project						
Change Compared to the 2007 EIR	-43	-36	-314	<1	-16	<1
South Coast AQMD Regional Threshold	55	55	550	150	150	550
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.2.25. Highest winter or summer emissions are reported.

Notes: lbs = Pounds.

¹ Riverside County. 2006, December. Draft Oaks Springs Ranch Specific Plan Environmental Impact Report. State Clearinghouse (SCH) # 2004071076.

² Trips are based on data in the Traffic Impact Analysis in Appendix 5.8-1 of this Draft SEIR.

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Level of Significance Before Mitigation: Impact 5.2-2 would less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required for the Modified Project beyond the applicable mitigation measures from the 2007 EIR.

Level of Significance After Mitigation: Impact 5.2-2 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Impact 5.2-3: Would the Modified Project expose sensitive receptors to substantial pollutant concentrations? [Threshold AQ-3]

This impact analysis describes changes in localized impacts from short-term construction activities. Since certification of the 2007 EIR, Phase 1 of the Original Project in Planning Area 1 has already been built and the area has had significant development. Therefore, the LST analysis for the Modified Project considers these changes and has been updated based on the distance to the nearest sensitive receptor, which would be the Planning Area 1 residences immediately north of the Modified Project site. The Modified Project could expose sensitive receptors to elevated pollutant concentrations during construction activities if it would cause or contribute significantly to elevated levels. Unlike the mass of emissions shown in the regional emissions analysis in Table 5.2-9, described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or $\mu\text{g}/\text{m}^3$) and can be correlated to potential health effects.

Construction-Phase LSTs

Screening-level LSTs (pounds per day) are the amount of project-related mass emissions at which localized concentrations (ppm or $\mu\text{g}/\text{m}^3$) could exceed the AAQS for criteria air pollutants for which the SoCAB is designated nonattainment. The screening-level LSTs are based on the project site size and distance to the nearest sensitive receptor and are based on the California AAQS, which are the most stringent AAQS, established to protect sensitive receptors most susceptible to respiratory distress. The 2007 EIR identified that grading activities would generate substantial concentrations of PM_{10} and impacts would be significant and unavoidable. Table 5.2-11 shows the maximum daily construction emissions (pounds per day) generated during on-site construction activities compared with the South Coast AQMD's screening-level LSTs, for sensitive receptors within 82 feet (25 meters). As shown in the table, the construction of the Modified Project would not generate construction-related on-site emissions that would exceed the screening-level LSTs. Thus, project-related construction activities would not have the potential to expose sensitive receptors to substantial pollutant concentrations and localized air quality impacts from construction activities would be less than significant. The Modified Project would not result in new or substantially more severe significant impacts in this regard.

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Table 5.2-11 Construction Emissions Compared to the Screening-Level LSTs

	Pollutants(lbs/day) ¹			
	NO _x	CO	PM ₁₀ ²	PM _{2.5} ²
South Coast AQMD ≤1.00 -acre LST	162	750	4.00	3.00
Rough Grading Soil Haul and Utilities Trenching	6	6	0.35	0.25
Utility Trenching	3	5	0.18	0.16
Building Construction 2022	1	3	0.02	0.02
Building Construction 2023	1	3	0.02	0.02
Building Construction 2023 and Architectural Coating	3	5	0.04	0.04
Building Construction 2024	1	3	0.02	0.02
Exceeds LST?	No	No	No	No
South Coast AQMD 1.50-Acre LSTs	198	925	5.50	3.50
Site Preparation	11	9	2.81	1.76
Exceeds LST?	No	No	No	No
South Coast AQMD 2.00-Acre LSTs	234	1,100	7.00	4.00
Building Construction 2024 and Finishing/Landscaping	10	9	0.32	0.30
Finishing/Landscaping	9	6	0.30	0.28
Exceeds LST?	No	No	No	No
South Coast AQMD 5.00-Acre LSTs	371	1,965	12.99	8.00
Rough Grading	30	23	5.32	2.79
Rough Grading and Soil Haul, Utilities Trenching	36	29	5.66	3.04
Excavation	30	23	5.32	2.79
Excavation and Paving	41	39	5.90	3.32
Excavation and Building Construction 2022	32	25	5.34	2.81
Building Construction 2022 and Fine Grading	12	9	0.60	0.39
Building Construction 2022, Fine Grading and Soil Haul	15	11	0.70	0.47
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2016.3.2.25.; South Coast Air Quality Management District (South Coast AQMD) 2008 and 2011.

Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment occurring on the project site are included in the analysis. LSTs are based on receptors within 82 feet (25 meters) of the site in SRA 25.

¹ Based on information provided or verified by the District. Where specific information regarding project-related construction activities or processes was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the South Coast AQMD.

² Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403 as well as Mitigation Measures 5.2-2A and 5.2-2B, including watering disturbed areas a minimum of three times per day, using soil stabilizers, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, street sweeping with Rule 1186-compliant sweepers, and using zero-VOC paints.

Construction Health Risk

The OEHHA issued updated guidance for the preparation of health risk assessments in March 2015 (OEHHA 2015). It has also developed a cancer risk factor and noncancer chronic reference exposure level for DPM based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. In addition, South Coast AQMD currently does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. Emissions from construction equipment primarily consist of DPM. The 2007 EIR did not identify any concentrations of short-term emissions that would constitute a significant health risk as there were no guidelines available at the time of certification. The Modified

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Cancer risk exposure is measured over a 30-year time frame and the proposed project is anticipated to be developed over 24 months, which would limit the exposure of on- and off-site receptors. Construction activities would be short-term and temporary. Based on guidance from South Coast AQMD, construction risk is extrapolated based on the LST analysis (South Coast AQMD 2011). As described above, construction activities would not exceed the screening-level construction LSTs. For the reasons stated above, it is anticipated that construction emissions would not pose a threat to on- and off-site receptors, and project-related construction health impacts would be less than significant. The Modified Project would not result in new or substantially more severe significant impacts in this regard.

Operational Phase LSTs

The 2007 EIR identified that emission levels for area source operations and onsite mobile sources would not exceed the operational LST thresholds and impacts would be less than significant. Operation of the Modified Project would not generate substantial quantities of emissions from on-site, stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions, such as chemical processing or warehousing operations where substantial truck idling could occur on-site, require a permit from South Coast AQMD. The Modified Project does not fall within these categories of uses. Therefore, net localized air quality impacts from project-related operations would be less than significant. The Modified Project would not result in new or substantially more severe significant impacts in this regard.

Carbon Monoxide Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hot spots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. The SoCAB has been designated in attainment of both the National and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (BAAQMD 2017). The Original Project would generate 102 PM peak hour trips and would not generate significant peak hour vehicle trips that would cause a CO impact. The Modified Project would generate 161 PM peak hour trips, which is also substantially below the peak hour vehicle trips needed to generate a significant CO impact. Implementation of the Modified Project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the project site. Thus, the Modified Project would not result in new or substantially more severe significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.2-3 would less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required for the Modified Project beyond the applicable mitigation measures from the 2007 EIR.

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Level of Significance After Mitigation: Impact 5.2-3 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Impact 5.2-4: Would the Modified Project conflict with or obstruct implementation of the applicable air quality plan? [Threshold AQ-1]

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

The regional emissions inventory for the SoCAB is compiled by South Coast AQMD and SCAG. Regional population, housing, and employment projections developed by SCAG are based, in part, on cities' general plan land use designations. These projections form the foundation for the emissions inventory of the AQMP. These demographic trends are incorporated into SCAG's regional transportation plan/sustainable communities strategy to determine priority transportation projects and vehicle miles traveled in the SCAG region. The AQMP strategy is based on projections from local general plans.

Changes in population, housing, or employment growth projections have the potential to affect SCAG's demographic projections and therefore the assumptions in South Coast AQMD's AQMP. The residential uses in the Original Project were determined to be consistent with the South Coast AQMD AQMP and would result in a reduction in emissions from the projected emissions in the General Plan applicable in 2007. Impacts as a result of the Original Project would be less than significant. Since certification of the 2007 EIR, the South Coast AQMD has adopted a new AQMP. The most recent applicable air quality plan for the SoCAB region is the 2016 South Coast AQMD AQMP.

The Modified Project would result in 288 multifamily residential units and associated amenities. As discussed in Impact 5.6-1 of Section 5.6, *Population and Housing*, the Modified Project's population growth would be within SCAG's forecast growth projections for the City. In addition, the long-term emissions generated by the Modified Project would not produce criteria air pollutants that exceed the South Coast AQMD significance thresholds for project operations (see Impact 5.2-2). South Coast AQMD's significance thresholds identify whether a project has the potential to cumulatively contribute to the SoCAB's nonattainment designations. Because the Modified Project would not exceed the South Coast AQMD's regional significance thresholds and growth is consistent with regional growth projections, the Modified Project would not interfere with South Coast AQMD's ability to achieve the long-term air quality goals identified in the AQMP. Therefore, the Modified Project would be consistent with the AQMP and impacts would be less than significant. The Modified Project would not result in new or substantially more severe significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.2-4 would be less than significant.

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Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required for the Modified Project beyond the applicable mitigation measures from the 2007 EIR.

Level of Significance After Mitigation: Impact 5.2-4 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Impact 5.2-5: Would the Modified Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? [Threshold AQ-4]

The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

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

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The 2007 EIR identified less than significant impacts with respect to odor emissions that would affect a substantial number of people. The Modified Project would include multifamily residences and associated amenities, which would not fall within the objectionable odors land uses. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be low in concentration, temporary, and would not affect a substantial number of people. Odor impacts would be less than significant. The Modified Project would not result in new or substantially more severe significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.2-5 would less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required for the Modified Project beyond the applicable mitigation measures from the 2007 EIR.

Level of Significance After Mitigation: Impact 5.2-5 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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5.2.6 Cumulative Impacts

In accordance with South Coast AQMD's methodology, any project that produces a significant project-level regional air quality impact in an area that is in nonattainment contributes to the cumulative impact. Consistent with the methodology, projects that do not exceed the regional significance thresholds would not result in significant cumulative impacts. Cumulative projects in the local area include new development and general growth in the Modified Project area. The greatest source of emissions in the SoCAB is mobile sources. Due to the extent of the area potentially impacted by cumulative emissions (i.e., the SoCAB), South Coast AQMD considers a project cumulatively significant when project-related emissions exceed the South Coast AQMD regional emissions thresholds shown in Table 5.2-5 (South Coast AQMD 1993).

Construction

The SoCAB is designated nonattainment for O₃ and PM_{2.5} under the California and National AAQS and nonattainment for PM₁₀ and lead (Los Angeles County only) under the National AAQS. Construction of cumulative projects will further degrade the regional and local air quality. Project-related construction activities for the Modified Project would not generate short-term emissions that exceed the South Coast AQMD regional emissions threshold or LST thresholds with incorporation of Mitigation Measures 5.2-2A and 5.2-2B from the 2007 EIR. Therefore, construction-source emissions as a result of the Modified Project would not be cumulatively considerable.

Operation

For operational air quality emissions, any project that does not exceed or can be mitigated to less than the daily regional threshold values would not be considered by South Coast AQMD to be a substantial source of air pollution and would not add significantly to a cumulative impact. Operation of the Modified Project would not result in emissions in excess of the South Coast AQMD regional emissions thresholds. Therefore, the Modified Project's contribution to cumulative air quality impacts would not be cumulatively considerable.

5.2.7 Level of Significance Before Additional Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, some impacts would be less than significant: 5.2-2, 5.2-3, 5.2-4, and 5.2-5.

Without mitigation, the following impact would be **potentially significant**:

- Impact 5.2-1 Would the Modified Project result in a cumulatively considerable net increase of criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard during construction activities?

5.2.8 Additional Mitigation Measures for the Modified Project

The following mitigation measure is in addition to the existing mitigation measures that apply to the Modified Project from the 2007 EIR:

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Impact 5.2-1

AQ-1 During construction activities, the construction contractor(s) shall limit the hauling of soil generated from grading/excavation activities to a maximum of 140 trucks per day (1,350 one-way soil haul trips per day if 16 cubic yard trucks are used; or 675 one-way soil haul trips if double haul trucks with a 30 cubic yard capacity is used; and assuming a one-way haul distance of 65 miles). The developer is required to find an export site within a 65-mile radius, and if one cannot be located, then the truck trips per day will need to be reduced to ensure impacts remain less than significant. Haul trucks with engines that are 2010 or newer shall be used for soil hauling activities. These requirements shall be noted on all construction management plans and verified by the City of Wildomar Building & Safety Department prior to issuance of any construction permits and during the soil-disturbing phases.

5.2.9 Level of Significance After Additional Mitigation

Impact 5.2-1

Implementation of Mitigation Measure AQ-1, which limit the hauling of soil generated from grading/excavation activities to a maximum of 140 trucks per day. As shown in Table 5.2-12, *Maximum Daily Regional Construction Emissions with Mitigation*, with the implementation of Mitigation Measures AQ-1, construction-related NOx emissions would be reduced to below the South Coast AQMD threshold. Modified Project and cumulative construction-related air quality impacts under Impact 5.2-1 would be reduced to less than significant.

Table 5.2-12 Maximum Daily Regional Construction Emissions During Soil Haul with Mitigation

Modified Project Construction Phase	Pollutants (lb/day) ^{1,2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2022 Rough Grading and Soil Haul, Utilities Trenching	5	94	40	<1	13	5
2022 Rough Grading Soil Haul and Utilities Trenching	2	64	17	<1	8	2
Modified Project Maximum Daily Construction Emissions						
Maximum Daily Emissions (Modified Project)	26	94	40	<1	13	5
South Coast AQMD Regional Construction Threshold	75	100	550	150	150	55
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.2.25

¹ Based on the preliminary information provided by the project applicant. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.

² Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403 as well as Mitigation Measures 5.2-2A and 5.2-2B, including watering disturbed areas a minimum of three times per day, using soil stabilizers, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers as well as implementation of Mitigation Measure AQ-1, which restricts the number of soil haul trucks per day.

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5.2.10 References

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5.3 GREENHOUSE GAS EMISSIONS AND ENERGY

This section of the Draft SEIR evaluates the potential for the implementation of the Modified Project to cumulatively contribute to greenhouse gas (GHG) emissions impacts. Because no single project is large enough to result in a measurable increase in global concentrations of GHG, climate change impacts of a project are considered on a cumulative basis. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (South Coast AQMD). GHG emissions modeling was conducted using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2.25, and model outputs are in Appendix 5.2-1 of this SEIR.

Terminology

The following are definitions for terms used throughout this section.

- **Greenhouse gases (GHG).** Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.
- **Global warming potential (GWP).** Metric used to describe how much heat a molecule of a greenhouse gas absorbs relative to a molecule of carbon dioxide (CO₂) over a given period of time (20, 100, and 500 years). CO₂ has a GWP of 1.
- **Carbon dioxide-equivalent (CO₂e).** The standard unit to measure the amount of greenhouse gases in terms of the amount of CO₂ that would cause the same amount of warming. CO₂e is based on the GWP ratios between the various GHGs relative to CO₂.
- **MTCO₂e.** Metric ton of CO₂e.
- **MMTCO₂e.** Million metric tons of CO₂e.

5.3.1 Environmental Setting

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHGs, to the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed in the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent are nitrous oxide (N₂O), sulfur hexafluoride (SF₆),

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hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).^{1,2} The major GHGs applicable to the Modified Project are briefly described.

- **Carbon dioxide (CO₂)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and also as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane (CH₄)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in landfills and water treatment facilities.
- **Nitrous oxide (N₂O)** is emitted during agricultural and industrial activities as well as during the combustion of fossil fuels and solid waste.
- GHGs are dependent on the lifetime or persistence of the gas molecule in the atmosphere. Some GHGs have stronger greenhouse effects than others. These are referred to as high GWP gases. The GWP of GHG emissions are shown in Table 5.3-1, *GHG Emissions and Their Relative Global Warming Potential Compared to CO₂*. The GWP is used to convert GHGs to CO₂-equivalence (CO₂e) to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. For example, under IPCC's Fourth Assessment Report (AR4), GWP values for CH₄, 10 MT of CH₄ would be equivalent to 250 MT of CO₂.³

¹ Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant because it is considered part of the feedback loop rather than a primary cause of change.

² Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities (CARB 2017a). However, state and national GHG inventories do not include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

³ CO₂-equivalence is used to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. The global warming potential of a GHG is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

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Table 5.3-1 GHG Emissions and Their Relative Global Warming Potential Compared to CO₂

GHGs	Carbon Dioxide (CO ₂)	Methane ¹ (CH ₄)	Nitrous Oxide (N ₂ O)
Second Assessment			
Atmospheric Lifetime (Years)	50 to 200	12 (± 3)	120
Global Warming Potential Relative to CO ₂ ²	1	21	310
Fourth Assessment			
Atmospheric Lifetime (Years)	50 to 200	12	114
Global Warming Potential Relative to CO ₂ ²	1	25	298
Fifth Assessment³			
Atmospheric Lifetime (Years)	50 to 200	12	121
Global Warming Potential Relative to CO ₂ ²	1	28	265

Source: Intergovernmental Panel on Climate Change (IPCC) 1995, 2007, and 2013.

¹ The methane GWP includes direct effects and indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO₂ is not included.

² Based on 100-year time horizon of the GWP of the air pollutant compared to CO₂.

³ The GWP values in the IPCC's Fifth Assessment Report (IPCC 2013) reflect new information on atmospheric lifetimes of GHGs and an improved calculation of the radiative forcing of CO₂. However, the AR4 GWP used values to maintain consistency in statewide GHG emissions modeling. In addition, the 2017 Scoping Plan Update was based on the AR4 GWP values.

California's GHG Sources and Relative Contribution

In 2020, the statewide GHG emissions inventory was updated for 2000 to 2018 emissions using the GWPs in IPCC's AR4 (IPCC 2013). Based on these GWPs, California produced 425.3 MMTCO₂e GHG emissions in 2018. California's transportation sector was the single largest generator of GHG emissions, producing 39.9 percent of the state's total emissions. Industrial sector emissions made up 21.0 percent, and electric power generation made up 14.8 percent of the state's emissions inventory. Other major sectors of GHG emissions include commercial and residential (9.7 percent), agriculture and forestry (7.7 percent) high GWP (4.8 percent), and recycling and waste (2.1 percent) (CARB 2020).

Since the peak level in 2004, California statewide GHG emissions dropped below the 2020 GHG limit of 431 MMCO₂e in 2016 and have remained below the 2020 GHG limit since then. In 2018, emissions from routine GHG emitting activities statewide were 6 MMTCO₂e lower than the 2020 GHG limit. Per capita GHG emissions in California have dropped from a 2001 peak of 14.0 MTCO₂e per person to 10.7 MTCO₂e per person in 2018, a 24 percent decrease. Transportation emissions decreased in 2018 compared to the previous year, which is the first year over year decrease since 2013. Since 2008, California's electricity sector has followed an overall downward trend in emissions. In 2018, solar power generation has continued its rapid growth since 2013. Emissions from high-GWP gases increased 2.3 percent in 2018 (2000-2018 average year-over-year increase is 6.8 percent), continuing the increasing trend as they replace Ozone Depleting Substances (ODS) being phased out under the 1987 Montreal Protocol. Overall trends in the inventory also demonstrate that the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross domestic product (GDP)) is declining, representing a 43 percent decline since the 2001 peak, while the state's GDP has grown 59 percent during this period (CARB 2020).

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Human Influence on Climate Change

For approximately 1,000 years before the Industrial Revolution, the amount of GHGs in the atmosphere remained relatively constant. During the 20th century, however, scientists observed a rapid change in the climate and the quantity of climate change pollutants in the Earth's atmosphere that is attributable to human activities. The amount of CO₂ in the atmosphere has increased by more than 35 percent since preindustrial times and has increased at an average rate of 1.4 parts per million per year since 1960, mainly due to combustion of fossil fuels and deforestation (IPCC 2007). These recent changes in the quantity and concentration of climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants (CAT 2006). In the past, gradual changes in the earth's temperature changed the distribution of species, availability of water, etc. However, human activities are accelerating this process so that environmental impacts associated with climate change no longer occur in a geologic time frame but within a human lifetime (IPCC 2007).

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are hard to predict. Projections of climate change depend heavily upon future human activity. Therefore, climate models are based on different emission scenarios that account for historical trends in emissions and on observations of the climate record that assess the human influence of the trend and projections for extreme weather events. Climate-change scenarios are affected by varying degrees of uncertainty. For example, there are varying degrees of certainty on the magnitude of the trends for:

- Warmer and fewer cold days and nights over most land areas.
- Warmer and more frequent hot days and nights over most land areas.
- An increase in frequency of warm spells/heat waves over most land areas.
- An increase in frequency of heavy precipitation events (or proportion of total rainfall from heavy falls) over most areas.
- Larger areas affected by drought.
- Intense tropical cyclone activity increases.
- Increased incidence of extreme high sea level (excluding tsunamis).

Potential Climate Change Impacts for California

Observed changes over the last several decades across the western United States reveal clear signs of climate change. Statewide, average temperatures increased by about 1.7°F from 1895 to 2011, and warming has been greatest in the Sierra Nevada (CCCC 2012). The years from 2014 through 2016 showed unprecedented temperatures, with 2014 being the warmest (OEHHA 2018). By 2050, California is projected to warm by approximately 2.7°F above 2000

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averages, a threefold increase in the rate of warming over the last century. By 2100, average temperatures could increase by 4.1 to 8.6°F, depending on emissions levels (CCCC 2012).

In California and western North America, observations of the climate have shown: 1) a trend toward warmer winter and spring temperatures; 2) a smaller fraction of precipitation falling as snow; 3) a decrease in the amount of spring snow accumulation in the lower and middle elevation mountain zones; 4) advanced shift in the timing of snowmelt of 5 to 30 days earlier in the spring; and 5) a similar shift (5 to 30 days earlier) in the timing of spring flower blooms (CAT 2006). Overall, California has become drier over time, with five of the eight years of severe to extreme drought occurring between 2007 and 2016, with unprecedented dry years in 2014 and 2015 (OEHHA 2018). Statewide precipitation has become increasingly variable from year to year, with the driest consecutive four years occurring from 2012 to 2015 (OEHHA 2018). According to the California Climate Action Team—a committee of state agency secretaries and the heads of agencies, boards, and departments, led by the Secretary of the California Environmental Protection Agency—even if actions could be taken to immediately curtail climate change emissions, the potency of emissions that have already built up, their long atmospheric lifetimes (see Table 5.3-1), and the inertia of the Earth’s climate system could produce as much as 0.6°C (1.1°F) of additional warming. Consequently, some impacts from climate change are now considered unavoidable. Global climate change risks to California are shown in Table 5.3-2, *Summary of GHG Emissions Risks to California*, and include impacts to public health, water resources, agriculture, coastal sea level, forest and biological resources, and energy.

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Table 5.3-2 Summary of GHG Emissions Risks to California

Impact Category	Potential Risk
Public Health Impacts	Heat waves will be more frequent, hotter, and longer Fewer extremely cold nights Poor air quality made worse Higher temperatures increase ground-level ozone levels
Water Resources Impacts	Decreasing Sierra Nevada snow pack Challenges in securing adequate water supply Potential reduction in hydropower Loss of winter recreation
Agricultural Impacts	Increasing temperature Increasing threats from pests and pathogens Expanded ranges of agricultural weeds Declining productivity Irregular blooms and harvests
Coastal Sea Level Impacts	Accelerated sea level rise Increasing coastal floods Shrinking beaches Worsened impacts on infrastructure
Forest and Biological Resource Impacts	Increased risk and severity of wildfires Lengthening of the wildfire season Movement of forest areas Conversion of forest to grassland Declining forest productivity Increasing threats from pest and pathogens Shifting vegetation and species distribution Altered timing of migration and mating habits Loss of sensitive or slow-moving species
Energy Demand Impacts	Potential reduction in hydropower Increased energy demand

Sources: CEC 2006, 2009; CCCC 2012; CNRA 2014.

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5.3.1.1 REGULATORY BACKGROUND

This section describes the federal, state, and local regulations applicable to GHG emissions.

Federal

The US Environmental Protection Agency (EPA) announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat. The EPA's final findings respond to the 2007 US Supreme Court decision that GHG emissions fit within the Clean Air Act definition of air pollutants. The findings do not in and of themselves impose any emission reduction requirements but allow the EPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation (USEPA 2009).

To regulate GHGs from passenger vehicles, the EPA was required to issue an endangerment finding. The finding identifies emissions of six key GHGs—CO₂, CH₄, N₂O, hydrofluorocarbons, perfluorocarbons, and SF₆—that have been the subject of scrutiny and intense analysis for decades by scientists in the United States and around the world. The first three are applicable to the project's GHG emissions inventory because they constitute the majority of GHG emissions and, per South Coast AQMD guidance, are the GHG emissions that should be evaluated as part of a project's GHG emissions inventory.

US Mandatory Reporting Rule for GHGs (2009)

In response to the endangerment finding, the EPA issued the Mandatory Reporting of GHG Rule that requires substantial emitters of GHG emissions (e.g., large stationary sources) to report GHG emissions data. Facilities that emit 25,000 MTCO₂e or more per year are required to submit an annual report.

Update to Corporate Average Fuel Economy Standards (2017 to 2026)

The federal government issued new Corporate Average Fuel Economy (CAFE) standards in 2012 for model years 2017 to 2025, which required a fleet average of 54.5 miles per gallon in 2025. On March 30, 2020, the EPA finalized an updated CAFE and GHG emissions standards for passenger cars and light trucks and established new standards covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021 to 2026. However, in May 2020, California and 22 other states; the District of Columbia; the cities of Los Angeles, Denver, and New York; and the counties of San Francisco and Denver filed a lawsuit with the U.S. Court of Appeals for the District of Columbia Circuit, challenging the SAFE Rule. To date, a ruling has not been made on the lawsuit. In addition, a consortium of automakers and California have agreed on a voluntary framework to reduce emissions that can serve as an alternative path forward for clean vehicle standards nationwide. Automakers who agreed to the framework are Ford, Honda, BMW of North America, and Volkswagen Group of America. The framework supports continued annual reductions of vehicle GHG emissions through the 2026 model year, encourages innovation to accelerate the transition to electric vehicles, and gives industry the certainty needed to make investments and create jobs. This commitment means that the auto companies which are party to the voluntary agreement will only sell cars in the United States that meet these standards (CARB 2021).

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EPA Regulation of Stationary Sources under the Clean Air Act (Ongoing)

Pursuant to its authority under the Clean Air Act, the EPA has been developing regulations for new, large stationary sources of emissions such as power plants and refineries. Under former President Obama's 2013 Climate Action Plan, the EPA was directed to develop regulations for existing stationary sources as well. On June 19, 2019, the EPA issued the final Affordable Clean Energy rule, which became effective on August 19, 2019. This rule was crafted under the direction of former President Trump's Energy Independence Executive Order. It officially rescinds the Clean Power Plan rule issued during the Obama Administration and sets emissions guidelines for states in developing plans to limit CO₂ emissions from coal-fired power plants.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (Public Law 110-140) seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal government. The act sets increased corporate average fuel economy standards; the renewable fuel standard; appliance energy-efficiency standards; building energy-efficiency standards; and accelerated research and development tasks on renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration (USEPA 2019).

State

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in Executive Order S-03-05, Executive Order B-30-15, Assembly Bill (AB) 32, Senate Bill (SB) 32, and SB 375.

Executive Order S-03-05

Executive Order S-03-05, signed June 1, 2005, set the following GHG reduction targets for the state:

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

Assembly Bill 32, the Global Warming Solutions Act (2006)

Current State of California guidance and targets for reductions in GHG emissions are generally embodied in AB 32. AB 32 was passed by the California state legislature on August 31, 2006, to place the state on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction goals established in Executive Order S-03-05.

CARB 2008 Scoping Plan

The first Scoping Plan was adopted by the California Air Resources Board (CARB) on December 11, 2008. The 2008 Scoping Plan identified that GHG emissions in California are anticipated to be 596 MMTCO₂e in 2020. In December 2007, CARB approved a 2020 emissions limit of 427 MMTCO₂e (471 million tons) for the state (CARB

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2008). To effectively implement the emissions cap, AB 32 directed CARB to establish a mandatory reporting system to track and monitor GHG emissions levels for large stationary sources that generate more than 25,000 MTCO₂e per year, prepare a plan demonstrating how the 2020 deadline can be met, and develop appropriate regulations and programs to implement the plan by 2012.

First Update to the Scoping Plan

CARB completed a five-year update to the 2008 Scoping Plan, as required by AB 32. The First Update to the Scoping Plan, adopted May 22, 2014, highlights California's progress toward meeting the near-term 2020 GHG emission reduction goals defined in the 2008 Scoping Plan. As part of the update, CARB recalculated the 1990 GHG emission levels with the updated AR4 GWP_s, and the 427 MMTCO₂e 1990 emissions level and 2020 GHG emissions limit, established in response to AB 32, is slightly higher at 431 MMTCO₂e (CARB 2014).

As identified in the Update to the Scoping Plan, California is on track to meet the goals of AB 32. However, the update also addresses the state's longer-term GHG goals in a post-2020 element. The post-2020 element provides a long-term strategy for meeting the 2050 GHG goal, including a recommendation for the state to adopt a midterm target. According to the Update to the Scoping Plan, local government reduction targets should chart a reduction trajectory that is consistent with or exceeds the trajectory created by statewide goals (CARB 2014). CARB identified that reducing emissions to 80 percent below 1990 levels will require a fundamental shift to efficient, clean energy in every sector of the economy. Progressing toward California's 2050 climate targets will require significant acceleration of GHG reduction rates. Emissions from 2020 to 2050 will have to decline several times faster than the rate needed to reach the 2020 emissions limit (CARB 2014).

Executive Order B-30-15

Executive Order B-30-15, signed April 29, 2015, sets a goal of reducing GHG emissions in the state to 40 percent below 1990 levels by year 2030. Executive Order B-30-15 also directs CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires state agencies to implement measures to meet the interim 2030 goal as well as the long-term goal for 2050 in Executive Order S-03-05. It also requires the Natural Resources Agency to conduct triennial updates of the California adaptation strategy, Safeguarding California, in order to ensure climate change is accounted for in state planning and investment decisions.

Senate Bill 32 and Assembly Bill 197

In September 2016, Governor Brown signed Senate Bill 32 and Assembly Bill 197, making the Executive Order goal for year 2030 into a statewide, mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires the CARB to prioritize direction emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

2017 Climate Change Scoping Plan

Executive Order B-30-15 and SB 32 required CARB to prepare another update to the Scoping Plan to address the 2030 target for the state. On December 24, 2017, CARB approved the 2017 Climate Change Scoping Plan Update, which outlines potential regulations and programs, including strategies consistent with AB 197 requirements, to achieve the 2030 target. The 2017 Scoping Plan establishes a new emissions limit of 260

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MMTCO₂e for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030 (CARB 2017b).

California's climate strategy will require contributions from all sectors of the economy, including enhanced focus on zero- and near-zero-emission (ZE/NZE) vehicle technologies; continued investment in renewables such as solar roofs, wind, and other types of distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (methane, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conserve agricultural and other lands. Requirements for GHG reductions at stationary sources complement local air pollution control efforts by the local air districts to tighten criteria air pollutants and TACs emissions limits on a broad spectrum of industrial sources. Major elements of the 2017 Scoping Plan framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing ZE buses and trucks.
- Low Carbon Fuel Standard (LCFS), with an increased stringency (18 percent by 2030).
- Implementation of SB 350, which expands the Renewables Portfolio Standard (RPS) to 50 percent RPS and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency and utilizes near-zero emissions technology and deployment of ZE trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy, which focuses on reducing methane and hydrofluorocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- Continued implementation of SB 375.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

In addition to the statewide strategies listed above, the 2017 Climate Change Scoping Plan also identified local governments as essential partners in achieving the state's long-term GHG reduction goals and recommended local actions to reduce GHG emissions—for example, statewide targets of no more than 6 MT CO₂e or less per capita by 2030 and 2 MT CO₂e or less per capita by 2050. CARB recommends that local governments evaluate and adopt robust and quantitative locally appropriate goals that align with the statewide per capita targets and sustainable development objectives and develop plans to achieve the local goals. The statewide per capita goals were developed by applying the percent reductions necessary to reach the 2030 and 2050 climate goals (i.e., 40 percent and 80 percent, respectively) to the state's 1990 emissions limit established under AB 32. For CEQA projects, CARB states that lead agencies have discretion to develop evidenced-based numeric

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thresholds (mass emissions, per capita, or per service population) consistent with the Scoping Plan and the state's long-term GHG goals. To the degree a project relies on GHG mitigation measures, CARB recommends that lead agencies prioritize on-site design features that reduce emissions, especially from vehicle miles traveled (VMT), and direct investments in GHG reductions within the project's region that contribute potential air quality, health, and economic co-benefits. Where further project design or regional investments are infeasible or not proven to be effective, CARB recommends mitigating potential GHG impacts through purchasing and retiring carbon credits.

The Scoping Plan scenario is set against what is called the business-as-usual (BAU) yardstick—that is, what would the GHG emissions look like if the State did nothing at all beyond the existing policies that are required and already in place to achieve the 2020 limit, as shown in Table 5.3-3, *2017 Climate Change Scoping Plan Emissions Reductions Gap*. It includes the existing renewables requirements, advanced clean cars, the “10 percent” Low Carbon Fuel Standard (LCFS), and the SB 375 program for more vibrant communities, among others. However, it does not include a range of new policies or measures that have been developed or put into statute over the past two years. Also shown in the table, the known commitments are expected to result in emissions that are 60 MMTCO₂e above the target in 2030. If the estimated GHG reductions from the known commitments are not realized due to delays in implementation or technology deployment, the post-2020 Cap-and-Trade Program would deliver the additional GHG reductions in the sectors it covers to ensure the 2030 target is achieved.

Table 5.3-3 2017 Climate Change Scoping Plan Emissions Reductions Gap

Modeling Scenario	2030 GHG Emissions MMTCO ₂ e
Reference Scenario (Business-as-Usual)	389
With Known Commitments	320
2030 GHG Target	260
Gap to 2030 Target	60

Source: CARB 2017b.

Table 5.3-4, *2017 Climate Change Scoping Plan Emissions Change by Sector*, provides estimated GHG emissions compared to 1990 levels, and the range of GHG emissions for each sector estimated for 2030.

Table 5.3-4 2017 Climate Change Scoping Plan Emissions Change by Sector

Scoping Plan Sector	1990 MMTCO ₂ e	2030 Proposed Plan Ranges MMTCO ₂ e	% Change from 1990
Agricultural	26	24-25	-8% to -4%
Residential and Commercial	44	38-40	-14% to -9%
Electric Power	108	30-53	-72% to -51%
High GWP	3	8-11	267% to 367%
Industrial	98	83-90	-15% to -8%
Recycling and Waste	7	8-9	14% to 29%
Transportation (including TCU)	152	103-111	-32% to -27%
Net Sink ¹	-7	TBD	TBD
Sub Total	431	294-339	-32% to -21%
Cap-and-Trade Program	NA	24-79	NA

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Table 5.3-4 2017 Climate Change Scoping Plan Emissions Change by Sector

Scoping Plan Sector	1990 MMTCO ₂ e	2030 Proposed Plan Ranges MMTCO ₂ e	% Change from 1990
Total	431	260	-40%

Source: CARB 2017b.

Notes: TCU = Transportation, Communications, and Utilities; TBD = To Be Determined.

¹ Work is underway through 2017 to estimate the range of potential sequestration benefits from the natural and working lands sector.

Senate Bill 375

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce VMT and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPOs). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial.

Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target. SCAG's targets are an 8 percent per capita reduction from 2005 GHG emission levels by 2020 and a 13 percent per capita reduction from 2005 GHG emission levels by 2035 (CARB 2010). The 2020 targets are smaller than the 2035 targets because a significant portion of the built environment in 2020 has been defined by decisions that have already been made. In general, the 2020 scenarios reflect that more time is needed for large land use and transportation infrastructure changes. Most of the reductions in the interim are anticipated to come from improving the efficiency of the region's transportation network. The targets would result in 3 MMTCO₂e of reductions by 2020 and 15 MMTCO₂e of reductions by 2035. Based on these reductions, the passenger vehicle target in CARB's Scoping Plan (for AB 32) would be met (CARB 2010).

2017 Update to the SB 375 Targets

CARB is required to update the targets for the MPOs every eight years. In June 2017, CARB released updated targets and technical methodology and recently released another update in February 2018. The updated targets consider the need to further reduce VMT, as identified in the 2017 Scoping Plan Update, while balancing the need for additional and more flexible revenue sources to incentivize positive planning and action toward sustainable communities. Like the 2010 targets, the updated SB 375 targets are in units of percent per capita reduction in GHG emissions from automobiles and light trucks relative to 2005. This excludes reductions anticipated from implementation of state technology and fuels strategies and any potential future state strategies such as statewide road user pricing. The proposed targets call for greater per capita GHG emission reductions from SB 375 than are currently in place, which for 2035, translate into proposed targets that either match or exceed the emission reduction levels in the MPOs' currently adopted SCSs. As proposed, CARB staff's proposed targets would result in an additional reduction of over 8 MMTCO₂e in 2035 compared to the current targets. For the next round of SCS updates, CARB's updated targets for the SCAG region are an 8 percent per

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per capita GHG reduction in 2020 from 2005 levels (unchanged from the 2010 target) and a 19 percent per capita GHG reduction in 2035 from 2005 levels (compared to the 2010 target of 13 percent) (CARB 2018). CARB adopted the updated targets and methodology on March 22, 2018. All SCSs adopted after October 1, 2018, are subject to these new targets.

SCAG's Regional Transportation Plan / Sustainable Communities Strategy

SB 375 requires each MPO to prepare a sustainable communities strategy in its regional transportation plan. For the SCAG region, the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) (Connect SoCal) was adopted on September 3, 2020, and is an update to the 2016-2040 RTP/SCS (SCAG 2020). In general, the RTP/SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled from automobiles and light duty trucks and thereby reduce GHG emissions from these sources.

Connect SoCal focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land uses strategies in development of the SCAG region through horizon year 2045 (SCAG 2020). Connect SoCal forecasts that the SCAG region will meet its GHG per capita reduction targets of 8 percent by 2020 and 19 percent by 2035. Additionally, Connect SoCal also forecasts that implementation of the plan will reduce VMT per capita in year 2045 by 4.1 percent compared to baseline conditions for that year. Connect SoCal includes a “Core Vision” that centers on maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by locating housing, jobs, and transit closer together, and increasing investments in transit and complete streets (SCAG 2020).

Transportation Sector Specific Regulations

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I was a clean-car standard that reduced GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016, including a 30 percent reduction of GHG emissions in 2016. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model years 2017 through 2025 light-duty vehicles (see also the discussion on the update to the Corporate Average Fuel Economy standards under *Federal Laws*, above). In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases with requirements for greater numbers of ZE vehicles into a single package of standards. Under California's Advanced Clean Car program, by 2025 new automobiles will emit 34 percent less global warming gases and 75 percent less smog-forming emissions.

Executive Order S-01-07

On January 18, 2007, the state set a new LCFS for transportation fuels sold in the state. Executive Order S-01-07 sets a declining standard for GHG emissions measured in CO₂e gram per unit of fuel energy sold in California. The LCFS requires a reduction of 2.5 percent in the carbon intensity of California's transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The standard applies to refiners,

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blenders, producers, and importers of transportation fuels, and would use market-based mechanisms to allow these providers to choose how they reduce emissions during the “fuel cycle” using the most economically feasible methods.

Executive Order B-16-2012

On March 23, 2012, the State announced that CARB, the California Energy Commission (CEC), the Public Utilities Commission, and other relevant agencies worked with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate ZE vehicles in major metropolitan areas, including infrastructure to support them (e.g., electric vehicle charging stations). The executive order also directed the number of ZE vehicles in California’s state vehicle fleet to increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are ZE by 2015 and at least 25 percent by 2020. The executive order also establishes a target for the transportation sector of reducing GHG emissions 80 percent below 1990 levels.

Executive Order N-79-20

On September 23, 2020 Governor Newsom signed Executive Order N-79-20 which identifies a goal that 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. Additionally, this Executive Order identified fleet goals for trucks of 100 percent of drayage trucks be zero emissions by 2035 and 100 percent of medium- and heavy-duty vehicles in the State be zero-emission by 2045, for all operations where feasible. Additionally, the Executive Order identifies a goal for the State to transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.

Renewables Portfolio: Carbon Neutrality Regulations

Senate Bills 1078, 107, X1-2, and Executive Order S-14-08

A major component of California’s Renewable Energy Program is the renewables portfolio standard established under Senate Bills 1078 (Sher) and 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. Executive Order S-14-08, signed in November 2008, expanded the State’s renewable energy standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production will decrease indirect GHG emissions from development projects because electricity production from renewable sources is generally considered carbon neutral.

Senate Bill 350

Senate Bill 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

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Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100, which replaces the SB 350 requirement of 45 percent renewable energy by 2027 with the requirement of 50 percent by 2026 and also raises California's RPS requirements for 2050 from 50 percent to 60 percent. SB 100 also establishes RPS requirements for publicly owned utilities that consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Furthermore, the bill also establishes an overall state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Executive Order B-55-18

Executive Order B-55-18, signed September 10, 2018, sets a goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.” Executive Order B-55-18 directs CARB to work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions should be offset by equivalent net removals of CO₂e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Energy Efficiency Regulations

California Building Code: Building Energy Efficiency Standards

Energy conservation standards for new residential and non-residential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 (Title 24, Part 6, of the California Code of Regulations [CCR]). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 Building Energy Efficiency Standards were adopted on May 9, 2018, and went into effect on January 1, 2020 (CBSC 2019a).

The 2019 standards move toward cutting energy use in new homes by more than 50 percent and will require installation of solar photovoltaic systems for single-family homes and multifamily buildings of three stories and less. The 2019 standards focus on four key areas: 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation requirements; 4) and nonresidential lighting requirements (CEC 2018a). Under the 2019 standards, nonresidential buildings will be 30 percent more energy efficient compared to the 2016 standards, and single-family homes will be 7 percent more energy efficient (CEC 2018b). When accounting for the electricity generated by the solar photovoltaic system, single-family homes would use 53 percent less energy compared to homes built to the 2016 standards (CEC 2018b).

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California Building Code: CALGreen

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (24 CCR, Part 11, known as "CALGreen") was adopted as part of the California Building Standards Code. CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.⁴ The mandatory provisions of CALGreen became effective January 1, 2011, and were last updated in 2019 (CBSC 2019b). The 2019 CALGreen standards became effective January 1, 2020.

Section 5.408 of CALGreen also requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

2006 Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (20 CCR §§ 1601–1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances. Though these regulations are now often viewed as "business as usual," they exceed the standards imposed by all other states, and they reduce GHG emissions by reducing energy demand.

Solid Waste Diversion Regulations

AB 939: Integrated Waste Management Act of 1989

California's Integrated Waste Management Act of 1989 (AB 939) set a requirement for cities and counties throughout the state to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting (Public Resources Code §§ 40050 et seq.). In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the act requires that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.

AB 341

AB 341 (Chapter 476, Statutes of 2011) increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multifamily residential land uses. Section 5.408 of the CALGreen also requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

AB 1327

The California Solid Waste Reuse and Recycling Access Act (AB 1327) requires areas to be set aside for collecting and loading recyclable materials in development projects (Public Resources Code §§ 42900 et seq.). The act required the California Integrated Waste Management Board to develop a model ordinance for

⁴ The green building standards became mandatory in the 2010 edition of the code.

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adoption by any local agency requiring adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.

AB 1826

In October of 2014, Governor Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses and multifamily residential dwellings that consist of five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

Water Efficiency Regulations

SBX7-7

The 20x2020 Water Conservation Plan was issued by the Department of Water Resources (DWR) in 2010 pursuant to Senate Bill 7, which was adopted during the 7th Extraordinary Session of 2009–2010 and therefore dubbed “SBX7-7.” SBX7-7 mandated urban water conservation and authorized the DWR to prepare a plan implementing urban water conservation requirements (20x2020 Water Conservation Plan). In addition, it required agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 requires urban water providers to adopt a water conservation target of 20 percent reduction in urban per capita water use by 2020 compared to 2005 baseline use.

AB 1881: Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act of 2006 (AB 1881) requires local agencies to adopt the updated DWR model ordinance or an equivalent. AB 1881 also requires the CEC to consult with the DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

Short-Lived Climate Pollutant Reduction Strategy

Senate Bill 1383

On September 19, 2016, the Governor signed SB 1383 to supplement the GHG reduction strategies in the Scoping Plan to consider short-lived climate pollutants, including black carbon and methane. Black carbon is the light-absorbing component of fine particulate matter produced during incomplete combustion of fuels. SB 1383 requires the state board, no later than January 1, 2018, to approve and begin implementing that comprehensive strategy to reduce emissions of short-lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030, as specified. The bill also establishes targets for reducing organic waste in landfill. On March 14, 2017, CARB adopted the “Final Proposed Short-Lived Climate Pollutant Reduction Strategy,” which identifies the state’s approach to reducing anthropogenic and biogenic sources of short-lived climate pollutants.

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Anthropogenic sources of black carbon include on- and off-road transportation, residential wood burning, fuel combustion (charbroiling), and industrial processes. According to CARB, ambient levels of black carbon in California are 90 percent lower than in the early 1960s despite the tripling of diesel fuel use (CARB 2017b). In-use on-road rules are expected to reduce black carbon emissions from on-road sources by 80 percent between 2000 and 2020. South Coast AQMD is one of the air districts that requires air pollution control technologies for chain-driven broilers, which reduces particulate emissions from these char broilers by over 80 percent (CARB 2017b). Additionally, South Coast AQMD Rule 445 limits installation of new fireplaces in the SoCAB.

Regional

Western Riverside Council of Governments

The City of Wildomar is a participant in the Western Riverside Council of Government's (WRCOG) Climate Action Plan (CAP). In order to aggressively address the threats of global climate change, the WRCOG has prepared a CAP, which provides a framework for reducing GHG emissions and managing resources to best prepare for a changing climate. The CAP establishes a community-wide emissions reduction target of 15 percent below 2010, based on guidance from CARB and OPR. The CAP recommends GHG emissions targets that are consistent to the reduction targets of the State of California and presents several strategies that will make it possible for cities to meet the recommended targets.

5.3.1.2 EXISTING CONDITIONS

The project site is within Planning Area 2 of the Original Project and is currently vacant and does not generate greenhouse gas emissions. As shown in Figure 1-2, *Aerial Photograph*, the project site is vacant and contains ruderal vegetation. The project site is bound by Planning Area 1 (multi-family residential) to the north, Planning Area 3 and Inland Valley Drive to the east, and Planning Area 3 (open space) to the south and west. The entire 48.15-acre Oak Springs Ranch Specific Plan Area is bound by Clinton Keith Road to the north, Inland Valley Drive to the east, Inland Medical Center and I-15 to the south, and Oak Springs Road to the west. Uses surrounding the Oak Springs Ranch Specific Plan Area include vacant land to the northeast and east; commercial uses to the southeast, west, and north; and Inland Valley Medical Center and I-15 to the south. The residential land uses in Planning Area 1 currently generate greenhouse gas emissions area sources, energy use, mobile sources, water use, and wastewater and solid waste generation.

Electricity

Electricity is quantified using kilowatts (kW) and kilowatt-hours (kWh). A kW is a measure of 1,000 watts of electrical power and a kWh is a measure of electrical energy equivalent to a power consumption of 1,000 watts for 1 hour. The kWh is commonly used as a billing unit for energy delivered to consumers by electric utilities. According to the CEC's "Tracking Progress" regarding statewide energy demand, total electric energy usage in California was 288,613 gigawatt hours in 2017 (CEC 2018c). A gigawatt is equal to one billion (10⁹) watts or 1,000 megawatts (1 megawatt = 1,000 kW).

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The electricity supply for the City of Wildomar is provided by Southern California Edison (SCE). Total electricity consumption in SCE's service area in gigawatt-hours (GWh) was 105,162 GWh in 2019 (CEC 2021a). Sources of electricity sold by SCE in 2019, the latest year for which data are available, were:

- 35 percent renewable, consisting mostly of solar and wind
- 8 percent large hydroelectric
- 16 percent natural gas
- 8 percent nuclear
- 33 percent unspecified sources, that is, not traceable to specific sources (SCE 2020)

Natural Gas

Gas is typically quantified using the “therm,” which is a unit of heat energy equal to 100,000 British thermal units (BTU) and is the energy equivalent of burning 100 cubic feet of natural gas. The Southern California Gas Company (SoCalGas) provides natural gas to the project site. SoCalGas’ service area spans much of the southern half of California, from Imperial County on the southeast to San Luis Obispo County on the northwest to part of Fresno County on the north to Riverside County and most of San Bernardino County on the east (CEC 2020). Total natural gas supplies available to SoCalGas for year 2021 is 2,544 million cubic feet per day (MMcf/day) (CGEU 2018). Total natural gas consumption in SoCalGas’s service area was 729,164 MMcf for year 2019, which is equivalent to 2,054 MMcf/day (CEC 2021b).

5.3.2 Thresholds of Significance

CEQA Guidelines Appendix G

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

Greenhouse Gas Emissions

GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

GHG-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Energy

E-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

E-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

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South Coast Air Quality Management District

South Coast AQMD has adopted a significance threshold of 10,000 MTCO₂e per year for permitted (stationary) sources of GHG emissions for which South Coast AQMD is the designated lead agency. To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, South Coast AQMD convened a GHG CEQA Significance Threshold Working Group (Working Group). The Working Group identified GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold – that could be applied by lead agencies. Although the SCAQMD Board has not approved the thresholds, in 2010, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold.

Based on the last Working Group meeting (Meeting No. 15) in September 2010, South Coast AQMD identified a tiered approach for evaluating GHG emissions for development projects where South Coast AQMD is not the lead agency (South Coast AQMD 2010a). If the Modified Project exceed the Tier 3 screening GHG threshold, then the City and project applicant would proceed to Tier 4, which is the efficiency metric thresholds subject to Year 2035 GHG reductions targets. This following tiered approach has not been formally adopted by South Coast AQMD.

- **Tier 1.** If a project is exempt from CEQA, project-level and contribution to significant cumulative GHG emissions are less than significant.
- **Tier 2.** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (e.g., city or county), project-level and contribution to significant cumulative GHG emissions are less than significant.
- **Tier 3.** If GHG emissions are less than the screening-level criterion, project-level and contribution to significant cumulative GHG emissions are less than significant.

For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, the South Coast AQMD methodology calls for an assessment of GHG emissions. Project-related GHG emissions include on-road transportation, energy use, water use, wastewater generation, solid waste disposal, area sources, off-road emissions, and construction activities. The South Coast AQMD Working Group identified that because construction activities would result in a “one-time” net increase in GHG emissions, construction activities should be amortized into the operational phase GHG emissions inventory based on the service life of a building. For buildings in general, it is reasonable to look at a 30-year time frame, since this is a typical interval before a new building requires the first major renovation. South Coast AQMD identified a screening-level threshold of 3,000 MTCO₂e annually for all land use types. The bright-line screening-level criteria are based on a review of the Governor's Office of Planning and Research database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds. Therefore, projects that do not exceed the bright-line threshold would have a nominal, and therefore, less than

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cumulatively considerable impact on GHG emissions. South Coast AQMD recommends use of the 3,000 MTCO₂e interim bright-line screening-level criterion for all project types (South Coast AQMD 2010b).

- **Tier 4.** If emissions exceed the screening threshold, a more detailed review of the project's GHG emissions is warranted.⁵

The South Coast AQMD Working Group has identified an efficiency target for projects that exceed the screening threshold of 4.8 MTCO₂e per year per service population (MTCO₂e/year/SP) for project-level analyses and 6.6 MTCO₂e/year/SP for plan level projects (e.g., program-level projects such as general plans) for the year 2020.⁶ The per capita efficiency targets are based on the AB 32 GHG reduction target and 2020 GHG emissions inventory prepared for CARB's 2008 Scoping Plan.⁷

For purposes of this analysis, because the City has not developed its own numeric GHG significance threshold, the South Coast AQMD Working Group's bright-line screening-level criterion of 3,000 MTCO₂e per year is used as the significance threshold for this project. If the project operation-phase emissions exceed this criterion, GHG emissions would be considered potentially significant in the absence of mitigation measures.

5.3.3 The 2007 Approved Project (Original Project)

The 2007 EIR did not analyze GHG emissions because it was certified prior to the adoption of Assembly Bill 32 (AB 32) and the Senate Bill 97 (SB 97) amendments (adopted December 30, 2009, effective March 18, 2010) to the CEQA Guidelines. In addition, the 2007 EIR did not specifically analyze energy because it was certified prior to the 2019 amendments to the CEQA Guidelines to incorporate subdivision (b) to CEQA Guidelines Section 15162.2. The amendment to section 15126.2 clarifies the need for an energy analysis.

The information provided in this section includes the most current scientific data on GHG and global climate change but does not change the conclusions of the Certified EIR. Current information on GHG emissions and global climate change do not trigger the need for preparation of a subsequent or supplemental EIR pursuant to Public Resources Section 21166 and CEQA Guidelines Section 15162. The current scientific information does not demonstrate that the Modified Project will result in new or substantially greater significant impacts than those that would have resulted from implementation of the Original Project.

⁵ South Coast AQMD had identified an efficiency target for projects that exceed the bright-line threshold: a 2020 efficiency target of 4.8 MTCO₂e per year per service population (MTCO₂e/year/SP) for project-level analyses and 6.6 MTCO₂e/year/SP for plan-level projects (e.g., general plans). Service population is generally defined as the sum of residential and employment population of a project. The per capita efficiency targets are based on the AB 32 GHG reduction target and 2020 GHG emissions inventory prepared for CARB's 2008 Scoping Plan.⁵

⁶ It should be noted that the Working Group also considered efficiency targets for 2035 for the first time in this Working Group meeting.

⁷ South Coast AQMD took the 2020 statewide GHG reduction target for land use only GHG emissions sectors and divided it by the 2020 statewide employment for the land use sectors to derive a per capita GHG efficiency metric that coincides with the GHG reduction targets of AB 32 for year 2020.

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5.3.4 Environmental Impacts of the Modified Project

5.3.4.1 METHODOLOGY

This GHG emissions evaluation was prepared in accordance with the requirements of CEQA to determine if significant GHG emissions impacts are likely in conjunction with the type and scale of development associated with the Modified Project. Air pollutant emissions are calculated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2.25. CalEEMod compiles an emissions inventory of construction (fugitive dust, off-gas emissions, on-road emissions, and off-road emissions), area sources, indirect emissions from energy use, mobile sources, indirect emissions from waste disposal (annual only), and indirect emissions from water/wastewater (annual only) use. The following provides a summary of the assumptions used for the Modified Project analysis. GHG emissions modeling datasheets are in Appendix 5.2-1.

Construction Phase

Construction would entail site preparation, rough grading and soil haul, utilities trenching and excavation, fine grading and soil haul, construction of the proposed structures and buildings, architectural coating, paving, and finishing and landscaping on the 12.89-acre Modified Project site. The Modified Project is anticipated to be constructed over a period of up to 24 months, from April 2022 to April 2024. Construction GHG emissions for the Modified Project are based on the preliminary information provided or verified by the City. For the purposes of comparison, construction GHG emissions for the Original Project are based on 103 single-family units and CalEEMod default construction durations.

Operational Phase

- **Transportation:** The primary source of mobile GHG emissions is tailpipe exhaust emissions from the combustion of fuel (i.e., gasoline and diesel). The average daily trip (ADT) generation for the Original and Modified weekday trips were provided by Urban Crossroads (see Appendix 5.8-1). Saturday and Sunday trips were calculated based on the rates provided in the Institute of Transportation Engineer's Trip Generation Manual (10th edition) (10th edition) (ITE 2017). Project-related on-road criteria air pollutant emissions are based on calendar year 2024 emission rates from EMFAC2017 (v. 1.0.3) for the project buildup year.
- **Area Sources.** Area source emissions from use of consumer cleaning products, landscaping equipment, and VOC emissions from paints are based on CalEEMod default values for the square footage of the proposed buildings and surface parking lot areas to be coated for the Modified Project. Area source emissions for the Original Project are based on CalEEMod default information based on the 103 single family residences.
- **Energy:** GHG emissions from energy use (i.e., natural gas and electricity) are based on the CalEEMod default natural gas and electricity usage rates. Based on a study of the statewide impacts of the 2019 changes to the California Energy Efficiency Standards, the reductions for newly constructed single-family residential buildings are estimated to be 4 percent for electricity and 9 percent for natural gas. Newly constructed

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multifamily residences are estimated to have a 2 percent reduction for electricity and 5 percent for natural gas (NORESCO 2018).

- **Solid Waste Disposal:** Indirect emissions from waste generation are based on data from the 2007 EIR.
- **Water/Wastewater:** Emissions of GHG are associated with the embodied energy used to supply, treat, and distribute water. Total water demand and wastewater generation are based on information provided by the applicant.

Life cycle emissions are not included in the GHG analysis consistent with California Resources Agency directives.⁸ Black carbon emissions are not included in the GHG analysis because CARB does not include this pollutant in the state's AB 32/SB 32 inventory but treats this short-lived climate pollutant separately.⁹

5.3.4.2 ENVIRONMENTAL ANALYSIS

Greenhouse Gas Emissions Impacts

Impact 5.3-1: Would the Modified Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? [Threshold GHG-1]

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

Project-related construction and operation-phase GHG emissions for the Original and Modified Project are shown in Table 5.3-5, *Project-Related Operation GHG Emissions*. As shown in the table, both the Original and Modified Projects would generate GHG emissions from vehicle trips generated by the project (e.g., residents) energy use (indirectly from purchased electricity use and directly through fuel consumed for building heating), and area sources (e.g., landscaping equipment used on-site, consumer products, coatings). Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the project. Overall, the development and operation of the Original Project and Modified Project would not generate annual emissions that exceed the South Coast AQMD bright-line threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO₂e) per year (South Coast AQMD 2010b). Similarly, the net change in emissions of 1,375 MTCO₂e per year would not exceed the

⁸ Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analysis was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials is also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

⁹ Particulate matter emissions, which include black carbon, are analyzed under *Air Quality*. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017a).

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South Coast AQMD bright-line threshold. Therefore, the Modified Project's cumulative contribution to GHG emissions would be less than significant. The Modified Project would not result in new or substantially more severe significant impacts in this regard.

Table 5.3-5 Project-Related Operation GHG Emissions

Source	Original Project GHG Emissions (MTCO ₂ e/Year)	Modified Project GHG Emissions (MTCO ₂ e/Year)	Net Change (MTCO ₂ e/Year)
Area	27	5	-22
Energy	373	594	221
Mobile (Vehicle Trips)	916	2,002	1086
Solid Waste	46	130	84
Water	57	44	-13
Amortized Construction Emissions ¹	NA	20	20
Total	1,420	2,795	1,375
South Coast AQMD Bright-Line Threshold	3,000 MTCO ₂ e/Yr	3,000 MTCO ₂ e/Yr	3,000 MTCO ₂ e/Yr
Exceeds Bright-Line Threshold?	No	No	No

Source: CalEEMod, Version 2016.3.2.25.

Notes: MTons = metric tons; MTCO₂e = metric ton of carbon dioxide equivalent

¹ Total construction emission are amortized over 30 years per South Coast AQMD methodology. The Original Project GHG emissions from construction are based on CalEEMod default values for construction of the 103 single family units.

Level of Significance Before Mitigation: Impact 5.3-1 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required for the Modified Project.

Level of Significance After Mitigation: Impact 5.3-1 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Impact 5.3-2: Would the Modified Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? [Threshold GHG-2]

Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and SCAG's RTP/SCS. A consistency analysis with these plans is presented below.

CARB Scoping Plan

CARB's Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by AB 32, which is to return to 1990 emission levels by year 2020. The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual projects.

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Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Since adoption of the 2008 Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of AB 32.

As previously mentioned, GHG emissions were not a topic of environmental concern in the Certified EIR. Since the certification of the EIR for the Original Project, Scoping Plans have been adopted to address SB 32, most recently the 2017 Scoping Plan. The Modified Project's GHG emissions would be reduced through compliance with statewide measures that have been adopted since AB 32 and SB 32 were adopted. Thus, the Modified Project would not conflict with the above statewide strategies identified to implement the CARB Scoping Plan and would not obstruct implementation of the CARB Scoping Plan, and impacts would be less than significant. The Modified Project would not result in new or substantially more severe significant impacts in this regard.

SCAG's Regional Transportation Plan / Sustainable Communities Strategy

As previously mentioned, GHG emissions were not a topic of environmental concern in the 2007 EIR. Since the certification of the 2007 EIR, a new RTP/SCS has been adopted. Most recently, SCAG adopted the 2020-2045 RTP/SCS (Connect SoCal) in September 2020. Connect SoCal finds that land use strategies that focus on new housing and job growth in areas rich with destinations and mobility options would be consistent with a land use development pattern that supports and complements the proposed transportation network. The overarching strategy in Connect SoCal is to plan for the southern California region to grow in more compact communities in transit priority areas and priority growth areas; provide neighborhoods with efficient and plentiful public transit; establish abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural lands and farmlands (SCAG 2020). Connect SoCal's transportation projects help more efficiently distribute population, housing, and employment growth, and forecast development is generally consistent with regional-level general plan data to promote active transportation and reduce GHG emissions. The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per-capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region.

The Connect SoCal Plan does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency for governments and developers. Similar to the Original Project, the Modified Project would develop new residences within the City. These new residences would serve the local population within the nearby surrounding communities. Serving the local community may reduce vehicle miles traveled by providing a closer option for future residents. Therefore, the Modified Project would not interfere with SCAG's ability to implement the regional strategies outlined in the Connect SoCal Plan, and

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impact would be less than significant. The Modified Project would not result in new or substantially more severe significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.3-2 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required for the Modified Project.

Level of Significance After Mitigation: Impact 5.3-2 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Energy Impacts

Impact 5.3-3: Would the Modified Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? [Threshold E-1]

Short-Term Construction Impacts

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

Electrical Energy

Construction of the Original and Modified Projects would not require electricity to power most construction equipment. Similar to the Original Project, electricity use during construction of the Modified Project would vary during different phases of construction. The majority of construction equipment during demolition and grading would be gas- or diesel-powered, and the later construction phases would require electricity-powered equipment for interior construction and architectural coatings. Additionally, it is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities. Therefore, project-related construction activities would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant. In addition, the Modified Project would not result in new or substantially more severe significant impacts in this regard.

Natural Gas Energy

It is not anticipated that construction equipment used for the Original or Modified Projects would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, impacts would be less than significant with respect to natural gas usage. The Modified Project would not result in new or substantially more severe significant impacts in this regard.

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Transportation Energy

Transportation energy use during construction of the Original and Modified Projects would come from delivery vehicles, haul trucks, and construction employee vehicles. In addition, transportation energy demand would come from use of off-road construction equipment. It is anticipated that the majority of off-road construction equipment, such as those used during demolition and grading, would be gas or diesel powered. The use of energy resources by these vehicles would fluctuate according to the phase of construction. Energy consumption during construction (2022 through 2024) was calculated using the CalEEMod (v. 2016.3.2.25) computer model and data from the EMFAC2017 (v. 1.0.3) and OFFROAD2017 (v. 1.0.1) databases. The results are shown in Table 5.3-6, *Construction-Related Fuel Usage*.

Table 5.3-6 Construction-Related Fuel Usage

Project Component	Gas		Diesel		Electricity	
	VMT	Gallons	VMT	Gallons	VMT	kWh
Construction Worker Commute	427,873	14,154	3,217	65	5,471	1,785
Construction Vendor Trips	284	53	7,890	872	0	0
Construction Truck Haul Trips	27	6	111,455	15,301	0	0
Construction Off-Road Equipment	N/A	0	N/A	42,409	N/A	0
Total	428,185	14,214	122,562	58,647	5,471	1,785

Source: CalEEMod v. 2016.3.2; EMFAC2017 v. 1.0.3; OFFROAD2017 v. 1.0.1.

Notes: VMT=vehicle miles traveled; kWh=kilowatt hour

To limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. In addition, construction trips would not result in unnecessary use of energy since the Project Site is centrally located and is served by numerous regional freeway systems (e.g., I-15 and I-215) that provide the most direct routes from various areas of the region. Furthermore, electrical energy would be available for use during construction from existing power lines and connections, precluding the use of less efficient generators. Moreover, all construction equipment would cease operating upon completion of project construction. Thus, energy use during construction of the project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant. While the Modified Project would result in the development of 288 multi-family residential units compared to the 103 single-family residences, it is anticipated that construction of the Original and Modified Projects would generally require similar construction processes. Additionally, as discussed, it is anticipated that construction activities would result in less than significant impacts for transportation fuels. Therefore, the Modified Project would not result in new or substantially more severe significant impacts in this regard.

Long-Term Impacts During Operation

Because the Modified Project site is currently vacant, no energy is being used on the Project Site. Operation of the Modified Project would therefore generate new demand for electricity, natural gas, and transportation energy. Operational use of energy would include heating, cooling, and ventilation of buildings; water heating;

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operation of electrical systems, use of on-site equipment and appliances; and indoor, outdoor, perimeter, and parking lot lighting.

Electrical Energy

Operation of the Modified Project would consume electricity for various purposes, including but not limited to heating, cooling, and ventilation of buildings, water heating, operation of electrical systems, lighting, and use of on-site equipment and appliances. Electrical service to the Modified Project would be provided by SCE through connections to existing off-site electrical lines and new on-site infrastructure. As shown in Table 5.3-7, *Electricity Consumption*, implementation of the Original Project would generate 893,876 kilowatt hours per year of electricity use at the project site. Implementation of the Modified Project would result in 1,513,026 kilowatt hours of electricity use per year, primarily due to electricity use by the proposed residential units.

Table 5.3-7 Electricity Consumption

Land Use	Electricity (kWh/year) ¹
Original Project Conditions	
Single Family Housing	893,876
Total	893,876
Modified Project Conditions	
Apartments Low Rise	1,394,700
Health Club	50,550
Other Asphalt Surfaces	57,400
Other Non-Asphalt Surfaces	0
Parking Lot	10,376
Recreational Swimming Pool	0
Total	1,513,026

Source: CalEEMod Version 2016.3.25.

The 2007 EIR determined that the Original Project would comply with the guidelines in Title 24 of the California Administrative Code. While the Modified Project would result in a higher electricity demand, it would also be consistent with the requirements of the Building Energy Efficiency Standards. However, the Title 24 standards were most recently updated in 2019 and would be more stringent than the standards that applied to the Original Project. Additionally, the Modified Project would also be required to comply with the current CALGreen; therefore, it would not result in wasteful or unnecessary electricity demands. The Modified Project would not result in a significant impact related to electricity. The Modified Project would not result in new or substantially more severe significant impacts in this regard.

Natural Gas Energy

The potential natural gas consumption for the project site is shown in Table 5.3-8, *Natural Gas Consumption*. As shown in the table, implementation of the Original Project would generate an average natural gas demand of 3,387,180 kilo British thermal units per year at the project site. Implementation of the Modified Project would generate an average natural gas demand of 4,506,620 kilo British thermal units per year, primarily due to natural

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gas use by the proposed residential units. The 2007 EIR determined that the Original Project would comply with the guidelines in Title 24 of the California Administrative Code. While the Modified Project would result in a higher natural gas demand than the Original Project, it would also be consistent with the requirements of the Building Energy Efficiency Standards and would not result in wasteful or unnecessary natural gas demands. In addition, the Title 24 standards were most recently updated in 2019 and would be more stringent than the standards those that applied to the Original Project. Therefore, operation of the Modified Project would result in less than significant impacts with respect to natural gas usage. The Modified Project would not result in new or substantially more severe significant impacts in this regard.

Table 5.3-8 Natural Gas Consumption

Land Use	Natural Gas (kBtu/year) ¹
Original Project Conditions	
Single Family Housing	3,387,180
Total	3,387,180
Modified Project Conditions	
Apartments Low Rise	4,348,020
Health Club	158600
Other Asphalt Surfaces	0
Other Non-Asphalt Surfaces	0
Parking Lot	0
Recreational Swimming Pool	0
Total	4,506,620

Source: CalEEMod Version 2016.3.25

Note: kBtu = kilo British thermal units

¹ Original Project conditions assumes that each unit would have a gas fireplace. Total includes 463,500 kBtu associated with operation of the 103 fireplaces for the single-family units. See Appendix 5.2-1.

Transportation Energy

Both the Original Project and Modified Project would consume transportation energy during operations from the use of motor vehicles. Because the efficiency of the motor vehicles in use, such as the average miles per gallon for motor vehicles involved with the Modified Project are unknown, estimates of transportation energy use is assessed based on the overall VMT and related transportation energy use. The Modified Project-related VMT would primarily come from residents. As seen in Table 5.3-9, *Project Annual Operation-Related Fuel Usage*, the annual VMT for the Original Project is estimated to be 3,282,840 miles while the Modified Project is estimated to be 7,172,966 miles.

The VMT for the Modified Project is higher than the Original Project, due to the additional housing units provided by the Modified Project in comparison to the Original Project. However, the average miles per gallon (MPG) for each fuel type would be the same for both the Original and Modified Projects. The Modified Project transportation energy use would not be any more inefficient or wasteful than that of the Original Project. In addition, because the Modified Project involves development of more residential housing units than the Original Project, it would provide more opportunities to reside in an urbanized area with nearby amenities and

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public transit options. These features of the Modified Project would contribute to minimizing VMT and transportation-related fuel usage. Thus, it is expected that operation-related fuel usage associated with the Modified Project would not be any more inefficient, wasteful, or unnecessary than similar development projects. Therefore, impacts would be less than significant with respect to operation-related fuel usage. The Modified Project would not result in new or substantially more severe significant impacts in this regard.

Table 5.3-9 Project Annual Operation-Related Fuel Usage

	Gasoline		Diesel		CNG		Electricity	
	Annual VMT	Annual Gallons	Annual VMT	Annual Gallons	Annual VMT	Annual Gallons	Annual VMT	Annual kWh
Original Project								
Passenger Vehicles	3,159,158	100,086	60,621	3,982	144	59	62,917	20,359
Average Miles Per Gallon (mpg)	31.56		15.22		2.45		3.09	
Modified Project								
Passenger Vehicles	6,902,722	218,687	132,456	8,700	315	129	137,473	44,484
Average Miles Per Gallon (mpg)	31.56		15.22		2.45		3.09	
Change from 2007 EIR	3,743,564	118,601	71,835	4,718	171	70	74,556	24,125

Source: EMFAC2017 v. 1.0.3. Based on CalEEMod default trip distance and trip generation data provided by Urban Crossroads.

Level of Significance Before Mitigation: Impact 5.3-3 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required for the Modified Project beyond the applicable mitigation measures from the 2007 EIR.

Level of Significance After Mitigation: Impact 5.3-3 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Impact 5.3-4: Would the Modified Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? [Threshold E-2]

The following discusses consistency of the Modified Project with state plans pertaining to renewable energy and energy efficiency.

California Renewables Portfolio Standard

The state's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the state's renewable portfolios standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill 350 (de Leon) was

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signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. Senate Bill 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures. On September 10, 2018, Governor Brown signed SB 100, which supersedes the SB 350 requirements. Under SB 100, the RPS for public owned facilities and retail sellers consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Additionally, SB 100 also established a new RPS requirement of 50 percent by 2026. The bill also established a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

The statewide RPS goal is not directly applicable to individual development projects, but to utilities and energy providers such as SCE, which is the utility that would provide all of electricity needs for the Modified Project. Compliance of SCE in meeting the RPS goals would ensure the State in meeting its objective in transitioning to renewable energy. The Modified Project also would be subject to the standards mentioned in the 2007 EIR, namely Title 24 of the California Administrative Code. Because the Modified Project would comply with the latest 2019 energy standards, it would offer an improvement over the energy standards of the Original Project. Therefore, implementation of the Modified Project would not conflict or obstruct plans for renewable energy and energy efficiency and no impact would occur. The Modified Project would not result in new or substantially more severe significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.3-4 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required for the Modified Project beyond the applicable mitigation measures from the 2007 EIR.

Level of Significance After Mitigation: Impact 5.3-4 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

5.3.5 Cumulative Impacts

Project-related GHG emissions are not confined to an air basin but are dispersed worldwide. Therefore, impacts under Impact 5.3-1 are the Project-specific impacts that contribute to a cumulative impact. As discussed in Impact 5.3-1 and Impact 5.3-2, the implementation of the Modified Project would not exceed the numeric threshold for GHG emissions and would be consistent with the aforementioned plans and policies. Therefore, Project-related GHG emissions and their contribution to global climate change would not be cumulatively considerable.

The areas considered for cumulative impacts to electricity and natural gas supplies are the service areas of SCE and SoCalGas, respectively. Other projects would generate increased electricity and natural gas demands.

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However, all projects within the SCE and SoCalGas service areas would be required to comply with the Building Energy Efficiency Standards and CALGreen, which would contribute to minimizing wasteful energy consumption and promoting renewable energy sources. Therefore, cumulative impacts with regards to energy would be less than significant, and project impacts would not be cumulatively considerable.

5.3.6 Level of Significance Before Additional Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, some impacts would be less than significant: 5.3-1, 5.3-2, 5.3-3, and 5.3-4.

5.3.7 Additional Mitigation Measures for the Modified Project

No significant adverse impacts related to air quality were identified and no mitigation measures are necessary.

5.3.8 Level of Significance After Additional Mitigation

No significant adverse impacts related to air quality were identified.

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5.4 LAND USE AND PLANNING

This section of the Draft SEIR evaluates the potential land use and planning impacts of the Modified Project compared to the land use and planning impacts of the Original Project.

5.4.1 Environmental Setting

5.4.1.1 REGULATORY BACKGROUND

Regional

Southern California Association of Governments

SCAG is a council of governments representing Imperial, Los Angeles, Orange, San Bernardino, Riverside, and Ventura counties. SCAG is the federally recognized metropolitan planning organization (MPO) for this region, which encompasses over 38,000 square miles. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the southern California region's MPO, SCAG cooperates with the South Coast Air Quality Management District, the California Department of Transportation, and other agencies in preparing regional planning documents. SCAG has development regional plans to achieve specific regional objectives. The plans most applicable to the proposed project are discussed below.

Regional Transportation Plan/Sustainable Communities Strategy

The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted on September 3, 2020. The 2020-2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. It embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions (CTCs), tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

The SCS is supported by a combination of transportation and land use strategies that help the region achieve state greenhouse gas emission reduction goals and federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry and utilize resources more efficiently.

Local

City of Wildomar General Plan

The Land Use Element of the General Plan provides goals and policies that are used to guide the implementation of land use objectives that provide for the present and future population:

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- **Policy LU-2.1:** Accommodate land use development in accordance with the patterns and distribution of use and density depicted on the General Plan Land Use Map (Figure LU-1) and the Area Plan Land Use Maps, in accordance with the following: (AI 1, 3, 5, 9, 27, 29, 30, 41, 60, 91)
 - Provide a land use mix at the countywide and area plan levels based on projected need and supported by evaluation of impacts to the environment, economy, infrastructure, and services.
 - Accommodate a range of community types and character, from agricultural and rural enclaves to urban and suburban communities.
 - Provide for a broad range of land uses, intensities, and densities, including a range of residential, commercial, business, industry, open space, recreation, and public facilities uses.
 - Concentrate growth near community centers that provide a mixture of commercial, employment, entertainment, recreation, civic, and cultural uses to the greatest extent possible.
 - Concentrate growth near or within existing urban and suburban areas to maintain the rural and open space character of Riverside County to the greatest extent possible.
 - Site Development to capitalize upon multi-modal transportation opportunities and promote compatible land use arrangements that reduce reliance on the automobile.
 - Prevent inappropriate development in areas that are environmentally sensitive or subject to severe natural hazards.
- **Policy LU-3.1:** Accommodate land use development in accordance with the patterns and distribution of use and density depicted on the General Plan Land Use Maps (Figure LU-1) and the Area Plan Land Use Maps in accordance with the following concepts: (AI 1, 3, 9, 10)
 - Accommodate communities that provide a balance mix of land uses, including employment, recreation, shopping, and housing.
 - Assist in and promote the development of infill and underutilized parcels which are located in Community Development areas, as identified on the General Plan Land Use Map.
 - Promote parcel consolidation or coordinated planning of adjacent parcels through incentive programs and planning assistance.
 - Create street and trail networks that directly connect local destinations, and that are friendly to pedestrians, equestrians, bicyclists, and others using non-motorized forms of transportation.
 - Re-plan existing urban cores and specific plans for higher density, compact development as appropriate to achieve the RCIP Vision.

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- In new towns, accommodate compact, transit-adaptive infrastructure (based on modified standards that take into account transit system facilities or street network).
- Provide the opportunity to link communities through access to multi-modal transportation systems.
- **Policy LU-3.3:** Promote the development and preservation of unique communities in which each community exhibits a special sense of place and quality of design. (AI 14, 30)
- **Policy LU-4.1:** Require that new developments be located and designed to visually enhance, not degrade the character of the surrounding area through consideration of the following concepts: (AI 1, 3, 6, 14, 23, 24, 41, 62)
 - Compliance with the design standards of the appropriate area plan land use category.
 - Require that structures be constructed in accordance with the requirements of the County's zoning, building, and other pertinent codes and regulations.
 - Require that an appropriate landscape plan be submitted and implemented for development projects subject to discretionary review.
 - Require that new development utilize drought tolerant landscaping and incorporate adequate drought-conscious irrigation systems.
 - Pursue energy efficiency through street configuration, building orientation, and landscaping to capitalize on shading and facilitate solar energy, as provided for in Title 24 of the California Administrative Code.
 - Incorporate water conservation techniques, such as groundwater recharge basins, use of porous pavement, drought tolerant landscaping, and water recycling, as appropriate.
 - Encourage innovative and creative design concepts.
 - Encourage the provision of public art.
 - Include consistent and well-designed signage that is integrated with the building's architectural character.
 - Provide safe and convenient vehicular access and reciprocal access between adjacent commercial uses.
 - Locate site entries and storage bays to minimize conflicts with adjacent residential neighborhoods.
 - Mitigate noise, odor, lighting, and other impacts on surrounding properties.
 - Provide and maintain landscaping in open spaces and parking lots.
 - Include extensive landscaping.
 - Preserve natural features, such as unique natural terrain, drainage ways, and native vegetation, wherever possible, particularly where they provide continuity with more extensive regional systems.
 - Require that new development be designed to provide adequate space for pedestrian connectivity and access, recreational trails, vehicular access and parking, supporting functions, open space, and other pertinent elements.
 - Design parking lots and structures to be functionally and visually integrated and connected.
 - Site buildings access points along sidewalks, pedestrian areas, and bicycle routes, and include amenities that encourage pedestrian activity.

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LAND USE AND PLANNING

- Establish safe and frequent pedestrian crossings.
- Create a human-scale ground floor environment that includes public open areas that separate pedestrian space from auto traffic or where mixed, it does so with special regard to pedestrian safety.
- **Policy LU-4.2:** Require property owners to maintain structures and landscaping to a high standard of design, health, and safety through the following: (AI 5)
 - Provide proactive code enforcement activities.
 - Promote programs and work with local service organizations and educational institutions to inform residential, commercial, and industrial property owners and tenants about property maintenance methods.
 - Promote and support community and neighborhood-based efforts for the maintenance, upkeep, and renovation of structures and sites.

Moreover, the 2013-2021 Housing Element strategies and programs that focus on the provisions of housing, and to meet or exceed the regional housing needs allocation.

- **Policy H-1:** Ensure there is sufficient supply of multi-family and single-family zoned land to meet the housing needs identified in the Regional Housing Needs Allocation (RHNA).
- **Policy H-2:** Maintain land use policies that allow residential growth consistent with the availability of adequate infrastructure and public services.

General Plan Land Use Designation

The land use designation of project site is Medium High Density Residential (MHDR) which allows for single-family attached and detached residence with a density range of 5 to 8 dwelling units per acre. The Highest Density Residential (HHDR) land use designation allows for multi-family dwelling units at 20+ units per acre, including apartments and condominiums.

City of Wildomar Municipal Code

As indicated in Chapter 17.110 SP Zone Requirements and Standards for Specific Plan No. 340, the project site, which is in Planning Area 2 of the Specific Plan, is permitted to have the same uses as the R-1 One-family dwelling unit zone (Chapter 17.24 of the Wildomar Municipal Code). The zoning designation for the site states that building heights shall not exceed a maximum height of 35 feet, shall have a minimum lot size of 2,730 square feet, and the minimum lot width shall be 30 feet and the minimum depth shall be 91 feet.

5.4.1.2 EXISTING CONDITIONS

As shown in Figure 1-2, *Aerial Photograph*, the project site is vacant and contains ruderal vegetation. The project site is bound by Planning Area 1 (multi-family residential) to the north, Planning Area 3 and Inland Valley Drive to the east, and Planning Area 3 (open space) to the south and west. The entire 48.15-acre Oak Springs Ranch Specific Plan Area is bound by Clinton Keith Road to the north, Inland Valley Drive to the east, Inland Medical Center and I-15 to the south, and Oak Springs Road to the west. Uses surrounding the

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Oak Springs Ranch Specific Plan Area include vacant land to the northeast and east; commercial uses to the southeast, west, and north; and Inland Valley Medical Center and I-15 to the south.

5.4.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would have a significant effect on the environment if the project would:

- LU-1 Physically divide an established community.
- LU-2 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.

5.4.3 The 2007 Approved Project (Original Project)

As stated in the 2007 EIR, the Original Project required the adoption of a General Plan Amendment, Change of Zone, and Specific Plan to accommodate the residential development of the Original Project. The Original Project required a zone change from Scenic Highway Commercial (C-P-S) and Industrial Park (I-P) to residential zoning designations. The southern seven acres of the Oaks Springs Ranch Specific Plan Area was designated as Light Industrial and required a General Plan Amendment to redesignate this portion to Community Center in order to accommodate the Original Project's residential and open space uses. The 2007 EIR stated that the Community Center concept provides a mix of land uses including high- to very high-density residential development, and that the Original Project would provide a mix of multifamily and single-family residential development thereby increasing the diversity of housing types. The 2007 EIR stated that the Original Project would be compatible with the Community Center concept as it would provide single- and multi-family housing within the residential densities envisioned for the Community Center, as well as private recreational facilities onsite. The 2007 EIR also stated that the Original Project would be within walking distance to existing and potential future retail services, medical offices, light industrial, and transit opportunities (Bus Stop # 23) near the I-15/Clinton Keith Road interchange.

5.4.4 Applicable Mitigation Measures from the 2007 EIR

All impacts were less than significant; no mitigation measures were proposed in the 2007 EIR.

5.4.5 Environmental Impacts of the Modified Project

Impact 5.4-1: Would the Modified Project physically divide an established community? [Threshold LU-1]

The project site is vacant and surrounded by Planning Area 1 (multi-family residential) to the north, Planning Area 3 and Inland Valley Drive to the east, and Planning Area 3 (open space) to the south and west. As with the Original Project, the Modified Project would not divide an established residential community. The Modified Project would result in the development of 288 multifamily dwelling units in nine buildings and one amenity building, instead of the 103 single-family dwelling units that were approved under the Original

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Project. The proposed multifamily dwelling units would complement the existing Planning Area 1 development and would share amenities on the project site, so it would not divide an established community.

The Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects, and the Modified Project would not result in new or more significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.4-1 would be less than significant.

Additional Mitigation Measures for the Modified Project

No mitigation measures are required.

Level of Significance After Mitigation: Impact 5.4-1 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Impact 5.4-2: Would the Modified 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? [Threshold LU-2]

City of Wildomar General Plan

The project site is currently designated Medium High Density Residential (MHDR) which allows for single-family residences; as the Modified Project proposes to develop multifamily dwelling units, a General Plan Amendment would be required to change the designation to Highest Density Residential (HDR).

Moreover, the project site would require a Specific Plan Amendment to change the designation of the site from Oak Springs Ranch SP PA2 Detached Residential to Oak Springs Ranch SP PA2 Multifamily Residential for the Modified Project. Additionally, to remain consistent with the rest of the open space area in the Specific Plan Area, a General Plan Amendment is required to change the designation of a portion of the open space area (southern tip) from Light Industrial (LI) to Conservation Habitat (OS-CH). With approval of the requested General Plan Amendment, the Modified Project would be consistent with General Plan designations.

The Modified Project would be consistent with the Wildomar General Plan policies pertaining to land use development. For example, Policies LU-3.1 and LU-4.1 call for the replanning of existing specific plans for higher density and compact development, and new developments to visually enhance the surrounding areas. The Modified Project would replace the approved single-family dwelling units with multifamily dwelling units, and would include visual enhancements and landscaping throughout the project site. Additionally, Policies H-1 and H-2 call for a sufficient supply of housing to meet the housing needs identified in the Regional Housing Needs Allocation and policies that allow residential growth consistent with available infrastructure and public services. Compared to the Original Project, which approved the construction of 103 single-family dwelling units, the Modified Project would provide an increase of 185 dwelling units compared to the Original Project. Therefore, the Modified Project would be consistent with the policies of the General Plan, and impacts would be less than significant.

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City of Wildomar Zoning and Specific Plan

The project site is currently designated as Specific Plan No. 340 (Planning Area 2) which allows for one family dwellings. As the Modified Project proposes to develop multifamily dwelling units, a Zoning Ordinance Amendment would be required to delete Section 17.110 SP Zone Requirements and Standards for Specific Plan No. 340 in its entirety and development of the Modified Project will comply with the development standards of SP No. 340, as amended. With approval of the requested Zoning Ordinance, the Modified Project would be consistent with the zoning and specific plan designations.

SCAG 2020-2045 RTP/SCS Consistency

The Modified Project is considered a project of regionwide significance under the criteria in SCAG's Intergovernmental Review Procedures Handbook (November 1995) and Section 15206 of the CEQA Guidelines because the Modified Project would require a general plan amendment. As such, a consistency with SCAG's 2020-2045 RTP/SCS goals is warranted by SCAG. The general plan amendment for the Modified Project would be required to change the existing land use designation from Medium High Density Residential (MHDR) to Highest Density Residential (HHDR) in order to accommodate the development of the proposed multifamily dwelling units. As described in Table 5.4-1, *SCAG's 2020-2045 RTP/SCS Consistency Analysis*, the Modified Project is generally consistent with the overarching goals of the RTP/SCS. The Modified Project would result in an increase in housing density within a half mile of transit. Therefore, the Modified Project is consistent with SCAG's RTP/SCS.

Table 5.4-1 SCAG's 2020-2045 RTP/SCS Consistency Analysis

Goals	Consistency Analysis
RTP/SCS G1: Encourage regional economic prosperity and global competitiveness.	Consistent. This goal is not directly applicable to the Modified Project. However, the Modified Project would not interfere with this goal. The Modified Project would be located proximate to commercial uses, and thereby future residents of the Modified Project could improve regional economic development and competitiveness by patronizing services within the project area.
RTP/SCS G2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	Consistent. This goal is not directly applicable to the Modified Project. However, the Modified Project would not interfere with this goal. It would include high density residential uses, which is within a half mile of transit stops, surrounded by commercial uses, and is approximately 735 feet east of I-15. The Modified Project would accommodate pedestrian traffic by creating an extension of the community trail system around the perimeter that connects to the Oak Springs Phase 1 perimeter trail to the north and the trail along Inland Valley Road to the south (Jon Rodarme Trail).
RTP/SCS G3: Enhance the preservation, security, and resilience of the regional transportation system.	Consistent. See response to RTP/SCS G-2.
RTP/SCS G4: Increase person and goods movement and travel choices within the transportation system.	Consistent. See response to RTP/SCS G-2.

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Table 5.4-1 SCAG's 2020–2045 RTP/SCS Consistency Analysis

Goals	Consistency Analysis
RTP/SCS G5: Reduce greenhouse gas emissions and improve air quality.	Consistent. Long-term emissions generated by the Modified Project would not produce criteria air pollutants that exceed the South Coast Air Quality Management District's significance thresholds for project operations activities. The Modified Project is a high-density residential development which would encourage limited vehicle trips by emphasizing the integration of a variety of uses within the project area. Transit stops within a half-mile of the site would give residents the opportunity to use public transportation. The Modified Project would accommodate pedestrian traffic by creating an extension of the community trail system around the perimeter that connects to the Oak Springs Phase 1 perimeter trail to the north and the trail along Inland Valley Road to the south (Jon Rodarme Trail).
RTP/SCS G6: Support healthy and equitable communities.	Consistent. See response to RTP/SCS G-5.
RTP/SCS G7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	Consistent. See response to G-5. The new uses would be constructed to achieve the 2019 Building and Energy Efficiency Standards.
RTP/SCS G8: Leveraging new transportation technologies and data-driven solutions that result in more efficient travel.	Consistent. This goal is not directly applicable to the Modified Project, but the Modified Project would not interfere with achievement of this goal. The Modified Project is a high-density residential development which would encourage limited vehicle trips by emphasizing the integration of a variety of uses within the project area. Transit stops within a half-mile of the site would give residents the opportunity to use public transportation.
RTP/SCS G9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	Consistent. The Modified Project would develop market-rate housing units onsite, which would be supported by transit in the area and be connected to community trails.
RTP/SCS G10: Promote conservation of natural and agricultural lands and restoration of habitats.	Consistent. The Modified Project would be developed on an unused parcel of land within an urbanized portion of the City of Wildomar, and therefore, would preserve natural and agricultural lands.

Source: SCAG 2020.

As with the Original Project, the Modified Project would require a General Plan Amendment; the Modified Project would also require a Specific Plan Amendment. The 2007 EIR stated that the Original Project would be compatible with the Community Center concept as it would provide residential and private recreational facilities within walking distance to existing and potential future retail services, medical offices, light industrial, and transit opportunities near the I-15/Clinton Keith Road interchange. The Modified Project would construct multifamily dwelling units in-lieu of the Original Project's single-family dwelling units within the same footprint.

The Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects, and the Modified Project would not result in new or more significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.4-2 would be less than significant.

Additional Mitigation Measures for the Modified Project

No mitigation measures are required.

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Level of Significance After Mitigation: Impact 5.4-2 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

5.4.6 Cumulative Impacts

Implementation of the Modified Project, in conjunction with other cumulative development in accordance with the City's General Plan could cause citywide land use and general planning impacts. Cumulative development projects in accordance with the General Plan would be subject to compliance with regional and local plans reviewed in this section. The development of the Modified Project would take place within the footprint of the project site. Therefore, the Modified Project would not result in citywide land use and planning impacts. The Modified Project would introduce high-density residential uses onsite within a half-mile of transit stops southeast and northwest of the site, and commercial uses. As discussed above, the Modified Project's land use and planning impacts would be similar to the Original Project's impacts. The Modified Project combined with related projects would not result in cumulatively considerable impacts to land use and planning.

5.4.7 Level of Significance Before Additional Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, all impacts would be less than significant.

5.4.8 Additional Mitigation Measures for Modified Project

No mitigation measures are required.

5.4.9 Level of Significance After Additional Mitigation

Impacts would be less than significant.

5.4.10 References

Southern California Association of Governments (SCAG). 2020, September 3, 20120–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). <https://www.connectsocal.org/Documents/Adopted/fConnectSoCal-Plan.pdf>

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LAND USE AND PLANNING

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5.5 NOISE

This section of the Draft Supplemental EIR (SEIR) evaluates the potential noise and vibration impacts of the Modified Project compared to the noise impacts of the Original Project.

5.5.1 Environmental Setting

Noise and Vibration Fundamentals

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.” The following are brief definitions of terminology used in this section:

Technical Terminology

- **Sound.** A disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.
- **Noise.** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
- **Decibel (dB).** A unitless measure of sound on a logarithmic scale.
- **A-Weighted Decibel (dBA).** An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- **Equivalent Continuous Noise Level (L_{eq}); also called the Energy-Equivalent Noise Level.** The value of an equivalent, steady sound level which, in a stated time period (often over an hour) and at a stated location, has the same A-weighted sound energy as the time-varying sound. Thus, the L_{eq} metric is a single numerical value that represents the equivalent amount of variable sound energy received by a receptor over the specified duration.
- **Statistical Sound Level (L_n).** The sound level that is exceeded “n” percent of time during a given sample period. For example, the L₅₀ level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period); that is, half of the sampling time, the changing noise levels are above this value and half of the time they are below it. This is called the “median sound level.” The L₁₀ level, likewise, is the value that is exceeded 10 percent of the time (i.e., near the maximum) and this is often known as the “intrusive sound level.” The L₉₀ is the sound level exceeded 90 percent of the time and is often considered the “effective background level” or “residual noise level.”

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- **Day-Night Sound Level (Ldn or DNL).** The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the sound levels occurring during the period from 10:00 PM to 7:00 AM.
- **Community Noise Equivalent Level (CNEL).** The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added from 7:00 pm to 10:00 pm and 10 dB from 10:00 pm to 7:00 am. For general community/environmental noise, CNEL and Ldn values rarely differ by more than 1 dB (with the CNEL being only slightly more restrictive, that is, higher than the Ldn value). As a matter of practice, Ldn and CNEL values are interchangeable and are treated as equivalent in this assessment.
- **Sensitive Receptor.** Noise- and vibration-sensitive receptors include land uses where quiet environments are necessary for enjoyment and public health and safety. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, and nursing homes are examples.
- **Peak Particle Velocity (PPV).** The peak rate of speed at which soil particles move (e.g., inches per second) due to ground vibration.
- **Vibration Decibel (VdB).** A unitless measure of vibration, expressed on a logarithmic scale and with respect to a defined reference vibration velocity. In the U.S., the standard reference velocity is 1 micro-inch per second (1×10^{-6} in/sec).

Sound Fundamentals

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in Hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the loudness of sound is the decibel (dB). Changes of 1 to 3 dBA are detectable under quiet, controlled conditions and changes of less than 1 dBA are usually indiscernible. A 3 dBA change in noise levels is considered the minimum change that is detectable with human hearing in outside environments. A change of 5 dBA is readily discernable to most people in an exterior environment, and a 10 dBA change is perceived as a doubling (or halving) of the sound.

The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are “felt” more as a vibration. Similarly, while people with extremely sensitive hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about 10,000 Hz and below about 200 Hz. Since the human ear is not equally sensitive to sound at all frequencies, a special frequency dependent rating scale is usually used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Sound Measurement

Sound pressure is measured through the A-weighted measure to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear’s de-emphasis of these frequencies.

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Unlike linear units such as inches or pounds, decibels are measured on a logarithmic scale, representing points on a sharply rising curve. On a logarithmic scale, an increase of 10 dBA is 10 times more intense than 1 dBA, 20 dBA is 100 times more intense, and 30 dBA is 1,000 times more intense. A sound as soft as human breathing is about 10 times greater than 0 dBA. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. Ambient sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud).

Sound levels are generated from a source and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. This phenomenon is known as “spreading loss.” For a single point source, sound levels decrease by approximately 6 dBA for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by on-site operations from stationary equipment or activity at a project site. If noise is produced by a line source, such as highway traffic, the sound decreases by 3 dBA for each doubling of distance in a hard site environment. Line source noise in a relatively flat environment with absorptive vegetation decreases by 4.5 dBA for each doubling of distance.

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called Leq), or alternately, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, the L50 noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. This level is also representative of the level that is exceeded 30 minutes in an hour. Similarly, the L2, L8, and L25 values represent the noise levels that are exceeded 2, 8, and 25 percent of the time or 1, 5, and 15 minutes per hour. These “L” values are typically used to demonstrate compliance for stationary noise sources with a city’s noise ordinance, as discussed below. Other values typically noted during a noise survey are the Lmin and Lmax. These values represent the minimum and maximum root-mean-square noise levels obtained over the measurement period.

Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, an artificial dB increment be added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL) or Day-Night Noise Level (Ldn). The CNEL descriptor requires that an artificial increment of 5 dBA be added to the actual noise level for the hours from 7:00 pm to 10:00 pm and 10 dBA for the hours from 10:00 pm to 7:00 am. The Ldn descriptor uses the same methodology except that there is no artificial increment added to the hours between 7:00 pm and 10:00 pm. Both descriptors give roughly the same 24-hour level with the CNEL being only slightly more restrictive (i.e., higher).

Psychological and Physiological Effects of Noise

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, and thereby affecting blood pressure, functions of the heart and the nervous system. In comparison, extended periods of noise exposure above 90 dBA could result in permanent hearing damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the human ear even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling

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sensation is replaced by the feeling of pain in the ear. This is called the threshold of pain. Table 5.5-1 shows typical noise levels from familiar noise sources.

Table 5.5-1 Typical Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Onset of physical discomfort	120+	
	110	Rock Band (near amplification system)
Jet Flyover at 1,000 feet	100	
Gas Lawn Mower at three feet	90	
Diesel Truck at 50 feet, at 50 mph	80	Food Blender at 3 feet
	70	Garbage Disposal at 3 feet
Noisy Urban Area, Daytime	70	Vacuum Cleaner at 10 feet
Commercial Area	60	Normal speech at 3 feet
Heavy Traffic at 300 feet	50	Large Business Office
	40	Dishwasher Next Room
Quiet Urban Daytime	30	Theater, Large Conference Room (background)
	30	Library
Quiet Suburban Nighttime	20	Bedroom at Night, Concert Hall (background)
	10	Broadcast/Recording Studio
Lowest Threshold of Human Hearing	0	Lowest Threshold of Human Hearing

Source: Caltrans 2013.

Vibration Fundamentals

Vibration is an oscillating motion in the earth. Like noise, vibration is transmitted in waves, but in this case through the earth or solid objects. Unlike noise, vibration is typically of a frequency that is felt rather than heard. Vibration amplitudes can be described in terms of peak particle velocity (PPV), which is the maximum instantaneous peak of the vibration signal. PPV is appropriate for evaluating potential building damage. The units for PPV are normally inches per second (in/sec). Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration.

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The way in which vibration is transmitted through the earth is called propagation. As vibration waves propagate from a source, the energy is spread over an ever-increasing area such that the energy level striking a given point is reduced with the distance from the energy source. This geometric spreading loss is inversely proportional to the square of the distance. The amount of attenuation provided by material damping varies with soil type and condition as well as the frequency of the wave.

5.5.1.1 REGULATORY BACKGROUND

State

California Building Code

The California Building Code (CBC), Title 24, Part 2, Volume 1, Chapter 12, Section 1207.11.2, Allowable Interior Noise Levels, requires that interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric is evaluated as either the day-night average sound level (L_{dn}) or the community noise equivalent level (CNEL), consistent with the noise element of the local general plan.

Structures with habitable rooms that are near major transportation noise sources within the 60 dBA CNEL noise contour require an acoustical analysis showing that the structure has been designed to limit intruding noise in the prescribed allowable levels. To comply with these regulations, applicants of new residential projects are required to submit an acoustical report in areas where noise and land use compatibility are concerns. The report is required to analyze exterior noise sources affecting the proposed dwelling site, predicted noise spectra at the exterior of the proposed dwelling structure considering present and future land usage, basis for the prediction (measured or obtained from published data), noise attenuation measures to be applied, and an analysis of the noise insulation effectiveness of the proposed construction showing that the prescribed interior noise level requirements are met. If interior allowable noise levels are met by requiring that windows be inoperable or closed, the design for the structure must also specify the means that will be employed to provide ventilation and cooling, if necessary, to provide a habitable interior environment.

General Plan Guidelines

The State of California, through its General Plan Guidelines, discusses how ambient noise should influence land use and development decisions and includes a table of normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable uses at difference noise levels expressed in CNEL or L_{dn} . A conditionally acceptable analysis designation implies new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use is made and needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements. Local municipalities adopt these compatibility standards as part of their General Plan and modify them as appropriate for their local environmental setting. County of Riverside compatibility standards are shown below in Table 5.5-3, *Land Use Compatibility for Noise Exposure*.

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Local

City of Wildomar General Plan

The Noise Element of the City of Wildomar General Plan includes goals and policies that aim to minimize the impact of noise sources found in the City. The following goals and policies are applicable to the Modified Project.

- **Policy N-1.1:** Protect noise-sensitive land uses from high levels of noise by restricting noise-producing land uses from these areas. If the noise-producing land use cannot be relocated, then noise buffers such as setbacks, landscaping, or blockwalls shall be used. (AI 107)
- **Policy N-1.3:** Consider the following uses noise-sensitive and discourage these uses in areas in excess of 65 CNEL:
 - Schools;
 - Hospitals;
 - Rest Homes;
 - Long Term Care Facilities;
 - Mental Care Facilities
 - Residential Uses;
 - Libraries;
 - Passive Recreation Uses; and
 - Places of Worship

According to the State of California Office of Planning and Research General Plan Guidelines, an acoustical study may be required in cases where these noise-sensitive land uses are located in an area of 60 CNEL or greater. Any land use that is exposed to levels of higher than 65 CNEL will require noise attenuation measures.

Areas around airports may have different noise standards than those cited above. Each Area Plan affected by a public-use airport includes one or more Airport Influence Areas, one for each airport. The applicable noise compatibility criteria are fully set forth in Appendix L and summarized in the Policy Area section of the affected Area Plan. (AI 105)

- **Policy N-1.4:** Determine if existing land uses will present noise compatibility issues with proposed by undertaking site surveys. (AI 106, 109)

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- **Policy N-1.5:** Prevent and mitigate the adverse impacts of excessive noise exposure on the residents, visitors, and noise-sensitive uses of Riverside County. (AI 105, 106, 108)
- **Policy N-1.6:** Minimize noise spillover or encroachment from commercial and industrial land uses into adjoining residential neighborhoods or noise-sensitive uses. (AI 107)
- **Policy N-1.7:** Require proposed land uses, affected by unacceptably high noise levels, to have an acoustical specialist prepare a study of the noise problems and recommend structural and site design features that will adequately mitigate the noise problem. (AI 106, 107)
- **Policy N-1.8:** Limit the maximum permitted noise levels that cross property lines and impact adjacent land uses, except when dealing with noise emissions from wind turbines.
- **Policy N-2.2:** Require a qualified acoustical specialist to prepare acoustical studies for proposed noise-sensitive projects within noise impacted areas to mitigate existing noise. (AI 105, 107)
- **Policy N-2.3:** Mitigate exterior and interior noises to the levels listed in the table below to the extent feasible, for stationary sources: (AI 105)

Table 5.5-2 Stationary Source Land Use Noise Standards

Land Use	Interior Standards, L ₁₀	Exterior Standards, L ₁₀
Residential		
10:00 p.m. to 7:00 a.m.	40 L _{eq} (10 minute)	45 L _{eq} (10 minute)
7:00 a.m. to 10:00 p.m.	55 L _{eq} (10 minute)	65 L _{eq} (10 minute)

Notes: These are only preferred standards; final decision will be made by the Riverside County Planning Department and Office of Public Health.
L₁₀ is the level exceeded 10% of the time, in one hour.

- **Policy N-4.1:** Prohibit facility-related noise, received by any sensitive use, from exceeding the following worst-case noise levels: (AI 105)
 - 45 dBA-10-minute L_{eq} between 10:00 p.m. and 7:00 a.m.
 - 65 dBA-10-minute L_{eq} between 7:00 a.m. and 10:00 p.m.
- **Policy N-4.2:** Develop measures to control non-transportation noise impacts. (AI 105)
- **Policy N-4.3:** Ensure any use determined to be a potential generator of significant stationary noise impacts be properly analyzed, and ensure that the recommended mitigation measures are implemented. (AI 105, 106, 109)
- **Policy N-4.4:** Require that detailed and independent acoustical studies be conducted for any new or renovated land uses or structures determined to be potential major stationary noise sources. (AI 105)
- **Policy N-4.5:** Encourage major stationary noise-generating sources throughout the County of Riverside to install additional noise buffering or reduction mechanisms within their facilities to reduce noise

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generation levels to the lowest extent practicable prior to the renewal of Conditional Use Permits or business licenses or prior to the approval and/or issuance of new Conditional Use Permits for said facilities. (AI 105, 107)

- **Policy N-4.6:** Establish acceptable standards for residential noise sources such as, but not limited to, leaf blowers, mobile vendors, mobile stereos, and stationary noise sources such as home appliances, air conditioners, and swimming pool equipment. (AI 105)
- **Policy N-4.7:** Evaluate noise producers for the possibility of pure-tone producing noises. Mitigate any pure tones that may be emitted from a noise source. (AI 106, 107)
- **Policy N-8.3:** Require development that generates increased traffic and subsequent increases in the ambient noise level adjacent to noise-sensitive land uses to provide for appropriate mitigation measures. (AI 106)
- **Policy N-12.1:** Minimize the impacts of construction noise on adjacent uses within acceptable practices. (AI 105, 108)
- **Policy N-12.2:** Ensure that construction activities are regulated to establish house of operation in order to prevent and/or mitigate the generation of excessive or adverse noise impacts on surrounding areas. (AI 105, 108)
- **Policy N-12.4:** Require that all construction equipment utilizes noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. (AI 105, 108)
- **Policy N-13.1:** Enforce the California Building Standards that sets standards for building construction to mitigate interior noise levels to the tolerable 45 CNEL limit. These standards are utilized in conjunction with the Uniform Building Code by the County's Building Department to ensure that noise protection is provided to the public. Some design features may include extra-dense insulation, double-paned windows, and dense construction materials.
- **Policy N-13.2:** Continue to develop effective strategies and mitigation measures for the abatement of noise hazards reflecting effective site design approaches and state-of-the-art building technologies. (AI 108)
- **Policy N-13.8:** Review all development applications for consistency with the standards and policies of the Noise Element of the General Plan.
- **Policy N-13.9:** Mitigate 600 square feet of exterior space to 65 dB CNEL when new development is proposed on residential parcels of 1 acre or greater.
- **Policy N-15.2:** Consider the following land uses sensitive to vibration:
 - Hospitals;
 - Residential Areas;

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- Concert Halls;
- Libraries;
- Sensitive Research Operations;
- Schools; and
- Offices

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Table 5.5-3 Land Use Compatibility for Noise Exposure

Land Uses	CNEL or Ldn (dBA)						
	55	60	65	70	75	80	
Residential-Low Density Single Family, Duplex, Mobile Homes							
Residential- Multiple Family							
Transient Lodging - Hotels and Motels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playground, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Businesses, Commercial and Professional							
Industrial, Manufacturing, Utilities, Agricultural							

Explanatory Notes

	Normally Acceptable: Specified land use is satisfactory, based on the assumption that any buildings are of normal conventional construction, without any special noise insulation requirements			Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in design.
	Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features included in design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.			Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: County of Riverside Noise Element

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City of Wildomar Municipal Code

Chapter 9.48, Noise Regulation, of the Wildomar Municipal Code, establishing Citywide standards to regulate noise, so that noise does not jeopardize the health, safety, or general welfare of the City of Wildomar residents and degrade their quality of life.

5.5.1.2 EXISTING CONDITIONS

The Modified Project site is a 12.89-acre site bounded by existing residential uses to the north, undeveloped land to the east across Inland Valley Drive, medical center and offices to the south (Inland Valley Medical Center), and commercial/retail uses such as an Ace Hardware and Albertsons to the west. The noise environment for the site is predominately characterized by the surrounding land uses and local roadway traffic.

Sensitive Receptors

Certain land uses, such as residences, schools, and hospitals, are particularly sensitive to noise and vibration. Sensitive receptors include residences, senior housing, schools, places of worship, and recreational areas. These uses are regarded as sensitive because they are where citizens most frequently engage in activities which are likely to be disturbed by noise, such as reading, studying, sleeping, resting, working from home, or otherwise engaging in quiet or passive recreation. Commercial and industrial uses are not particularly sensitive to noise or vibration.

Existing Traffic Conditions

Existing conditions are based on traffic noise modeling using a version of the Federal Highway Administration (FHWA) Traffic Noise Prediction Model, FHWA RD-77-108. Existing average daily traffic (ADT) volumes were provided by Urban Systems. Other inputs such as vehicle mix and day, evening, and night splits were based on inputs from in the County General Plan Noise Element Appendix. Table 5.5-4, *Existing Traffic Noise Levels* shows the existing traffic noise contour distances and noise level at 50 feet from the roadway.

Table 5.5-4 Existing Traffic Noise Levels

Roadway Segment	Existing ADT Volumes	CNEL at 50 feet	Distance to CNEL Contour (Feet from Centerline)		
			70 (dBA CNEL)	65 (dBA CNEL)	60 (dBA CNEL)
Inland Valley – Prielipp Road to Clinton Keith Road	11,884	67.7	35	76	164
Clinton Keith Road. – Inland Valley Drive to George Avenue	29,478	75.9	123	265	570
Clinton Keith Road. – George Avenue to Arya Road	30,962	76.1	127	273	589
Clinton Keith Road. – Arya Road to I-15 NB Ramps	37,692	76.9	145	312	671
Clinton Keith Road. – I-15 NB Ramps to I-15 SB Ramps	35,780	76.7	140	301	649
Clinton Keith Road. – I-15 SB Ramps to Hidden Springs Road	36,793	76.8	142	307	661

Source: Urban Systems, 2019.

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5.5.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would result in:

- N-1 Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- N-2 Generation of excessive groundborne vibration or groundborne noise levels.
- N-3 For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, if the project would expose people residing or working in the project area to excessive noise levels.

5.5.2.1 CONSTRUCTION NOISE THRESHOLDS

The 2007 EIR determined a potentially significant noise impact would occur if construction would generate noise levels greater than 65 dBA at a noise sensitive receptor. The 2007 EIR identified noise levels to be up to 68 dBA at the nearest noise-sensitive receptor (residences). For the purposes of this SEIR, the Modified Project would result in a significant impact if construction would generate noise greater than previously analyzed.

5.5.2.2 CONSTRUCTION VIBRATION THRESHOLDS

The 2007 EIR determined a potentially significant vibration impact would occur if the project would exceed the Federal Transit Administration's (FTA) vibration criterion for structures of 0.20 in/sec PPV and FTA criterion of 80 VdB for potential vibration annoyance.

5.5.2.3 MOBILE NOISE THRESHOLDS

The 2007 EIR determined a potentially significant mobile noise impact would occur if the project would cause:

- The project to increase noise levels by 5 dBA or more when the ambient noise level is less than 65 dBA CNEL; or
- The project to increase noise levels by 3 dBA or more when the ambient noise level is greater than 65 dBA CNEL.

5.5.2.4 STATIONARY NOISE THRESHOLDS

The 2007 EIR determined a potentially significant stationary noise impact would occur if it would exceed the noise level performance standards of 55 dBA L₁₀ during daytime hours (7:00 a.m. to 10 p.m.) and 45 dBA L₁₀ during the nighttime hours (10:00 p.m. to 7:00 a.m.) set forth in the County General Plan Noise Element. Should it occur that existing ambient levels exceed the performance standards, an increase of 3 dBA over existing noise levels would normally be considered perceptible and therefore, potentially significant.

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5.5.3 Summary of Impacts Identified in the 2007 Approved Project (Original Project)

Stationary Noise Impacts

The 2007 EIR found stationary noise generated from residential activities to be minimal and not exceed the County of Riverside exterior noise standards. Stationary noise-related impacts were found to be less than significant.

Mobile Noise Impacts.

The 2007 EIR found that project-related traffic noise would result in a maximum noise increase of 0.6 dB CNEL along Prelipp Road, east of Inland Drive. Project-related traffic noise was found to be less than significant.

Construction Noise Impacts

The 2007 EIR found construction noise to be up to 68 dBA L_{eq} at the nearest sensitive receptor, exceeding the County of Riverside exterior noise standard of 65 dBA L_{eq} , by 3 dBA. Construction noise impacts associated with the Original Project were identified as less than significant after mitigation.

Groundborne Vibration and Groundborne Noise Impacts

The 2007 EIR analyzed vibration impacts generated by temporary construction activities. Vibration-induced structural damage impacts were found to be less than 0.20 in/sec PPV and vibration annoyance impacts were found to be less than 80 VdB at the nearest sensitive receptors. The 2007 EIR found that the operational phase of the project would not generate perceptible levels of vibration. Therefore, vibration impacts were found to be less than significant.

5.5.4 Applicable Mitigation Measures from the 2007 EIR

The following 2007 EIR mitigation measures are applicable to the Modified Project. Mitigation measures are numbered as originally published in the Certified EIR.

Exterior Noise Mitigation

5.9-1H Noise wall shall be constructed as shown in the Summary of Recommendations of the Final Noise Analysis. If the site plan is revised, the Final Noise Analysis and Third Floor Interior Noise Mitigation shall be required to be revised to be consistent with the revised site plan. A 6.5 foot patio noise wall shall be constructed along Buildings 2, 3, 5, 6, 7 and 8. A 6.0 foot patio noise wall shall be constructed along Building 18. A 5.0 foot/patio noise wall shall be constructed along Building 17 and Lot 94.

5.9-1I The project applicant shall fully disclose the potential noise impacts for homebuyers/renters within the Oak Springs Ranch in multifamily units facing Clinton Keith Road in Buildings 2,

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3, 5, 6, 7, and 8 and homebuyers/renters within the Oak Springs Ranch in multifamily units facing I-15 in Buildings 17 and 18. The disclosure shall indicate that the exterior noise levels will approach and may at times exceed the County of Riverside noise limits from traffic noise from I-15 (for Buildings 17 and 18) or Clinton Keith Road (for Buildings 2, 3, 5, 6, 7, and 8), and will be clearly noticeable in the exterior living areas.

5.9-1J The project applicant shall fully disclose the potential noise impacts for all homebuyers/renters within the Oak Springs Ranch. The disclosure shall indicate that the exterior noise levels will approach and may at times exceed the County of Riverside noise limits from helicopter noise from the Inland Valley Medical Center and will be clearly noticeable in the exterior living areas.

Construction Noise Mitigation

5.9-3A During site excavation and soil-grading activities, the project contractor shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all mobile construction equipment so that emitted noise is directed away from noise-sensitive receptors nearest the project site.

5.9-3B The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.

5.9-3C The construction contractor shall limit construction-related activities that would result in high noise levels according to the construction hours determined by County Staff.

5.9-3D The construction contractor shall limit haul truck deliveries to the same hours as specified for construction equipment. To the extent feasible, haul trips shall not pass sensitive land uses or residential dwellings.

5.5.5 Environmental Impacts of the Modified Project

5.5.5.1 METHODOLOGY

The SEIR noise evaluation was prepared in accordance with the requirements of CEQA to fully disclose new impacts or changes in impacts that would occur because of the Modified Project. Per *CBLA v. BAAQMD*, noise compatibility for onsite sensitive receptors is generally no longer the purview of CEQA. However, the City requires projects to be designed to achieve the interior noise standards of the noise insulation requirements of the California Building Code for residential uses, which require exterior-interior noise insulation sufficient to achieve interior noise levels of 45 dBA CNEL from sources such as traffic noise affecting the residential portion of the proposed project. Traffic noise increases are determined by comparing the Original Project Baseline to the Modified Project's average daily traffic (ADT) volumes logarithmically ($10 \times \log(\text{Modified Project}$

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ADT/Original Project ADT). Cumulative traffic noise increases are similarly determined by comparing existing ADT to cumulative ADT. Roadway segments and ADT volumes were provided by Urban Systems.

Impact 5.5-1: Would the Modified Project result in the generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? [Threshold N-1]

Construction Noise

The Modified Project would replace the approved 103 single-family dwelling units designated in PA2 of the Specific Plan area and construct 288 multi-family dwelling units and one amenity building. The 2007 EIR analyzed construction of the 103 single-family homes on 12.89 acres. The Modified Project would temporarily elevate noise levels above the existing ambient during construction. However, the Modified Project would not result in an increase of disturbed area and would build the 288 multi-family building on the same area (12.89 acres). Anticipated construction activities, equipment, and noise levels would be similar to those already analyzed in the 2007 EIR. The 2007 EIR identified the nearest residential receptor to be approximately 367 feet to the north as measured from the edge of the project site to the residence. While Phase I of this project resulted in the construction of apartments that are now occupied, because they were part of the original project, they are not considered new sensitive receptors. CEQA only requires an analysis of a project's impact on the environment and not the environment's impact on a project. (Parker Shattuck Neighbors v. Berkeley City Council (2013) 222 Cal.App.4th 768.) In this case, buildup of the project includes Phase I and Phase II. The effect of construction noise from construction of Phase II on Phase I is not an impact of the project on the environment but rather, an impact of the project on itself, which does not constitute an environmental impact pursuant to CEQA. Therefore, the Phase I residents are not considered sensitive receptors for purposes of this analysis.

Therefore, the nearest residential receptor is approximately 830 feet to the north from the Modified Project's site boundary. Additionally, there would be no receptors closer to the project site than at the time of the 2007 EIR. Construction noise levels would not be substantially different or louder than previously analyzed. There would be no increase in the impacts previously identified.

Level of Significance Before Mitigation: Impact 5.5-1 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required.

Level of Significance After Mitigation: Impact 5.5-1 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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Impact 5.5-2	Would the Modified Project result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? [Threshold N-1]
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Mobile Noise Sources

As mentioned above in the Impact 5.5-1 discussion, the Modified Project would replace the approved 103 single-family dwelling units designated in PA2 of the Specific Plan area and construct 288 multi-family dwelling units. The increase in residential density would result in a greater number of trips and ADT compared to the Original Project for Phase 2. The approved 103 single-family homes were forecasted to generate 972 daily trips and the Modified Project is forecasted to generate 2,108 daily trips, resulting in a net increase of 1,136 daily trips. Table 5.5-5, *Modified Project's Traffic Noise Increase* shows traffic noise increases due to the Modified Project at roadway segments in the project area. As shown in the table, traffic noise would increase by up to 0.3 dBA CNEL. Therefore, the Modified Project would not result in a traffic noise increase of 5 dBA or greater where the ambient noise level is less than 65 dBA CNEL, nor a traffic noise increase of 3 dBA or greater where the ambient noise level is greater than 65 dBA CNEL.

Table 5.5-5 Modified Project Traffic Noise Increase

Roadway	Segment	ADT Volumes		dBA, CNEL ¹			Potentially Significant?
		2006 Plus Original Project	2006 Plus Modified Project	Original Project Baseline	Original Project Baseline Plus Modified Project	Noise Increase due to Modified Project	
Inland Valley Road	Prellip Road to Clinton Keith Road	2,517	2,681	61.6	61.9	0.3	No
Clinton Keith Road	Inland Valley Drive to George Avenue	7,443	7,549	74.3	74.4	0.1	No
Clinton Keith Road	George Avenue to Arya Road	2,533	2,639	74.3	74.5	0.2	No
Clinton Keith Road	Arya Road to I-15 NB Ramps	5,127	5,233	74.3	74.4	0.1	No
Clinton Keith Road	I-15 NB Ramps to I-15 SB Ramps	4,234	4,292	74.3	74.4	0.1	No
Clinton Keith Road	I-15 SB Ramps to Hidden Springs Road	4,286	4,294	74.0	74.0	0	No

Notes: ADT volumes/trip generation data provided by Urban Systems and Traffic Noise Model Calculations included in Appendix 5.5-1.

¹CNEL level at 100 feet.

Stationary Sources

Stationary noise impacts associated with the Original Project residential development were identified to be minimal and less than significant. The Modified Project is also a residential development and therefore not be a substantial stationary noise producer but would introduce two new types of noise sources. The first would be from the proposed extension of Oak Springs Phase 1 perimeter trail and the second would be from the proposed dog park. The Modified Project would extend the Oak Springs Phase 1 perimeter trail to the north and along Inland Valley Road to the south. The trail would generate minimal noise from passive hikers and

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occasional talking. The proposed dog park would be located on the northeast corner of the project site, adjacent to Inland Valley Drive. The nearest noise-sensitive receptor to the proposed dog park is approximately 850 feet to the north, across Clinton Keith Road. Noise levels from the dog park would attenuate and be acoustically masked by existing traffic along Clinton Keith Road. Noise associated with passive trail users and the community dog park would remain minimal at the nearest residential receptors.

The 2007 EIR indicated that helicopter noise from Inland Valley Medical Center would exceed the County of Riverside's stationary source noise standards, and it was determined that exterior noise mitigation for the Original Project is not practical for helicopter operations as helicopter noise would "go over" any walls erected to attempt to mitigate such noise. The Modified Project would not worsen helicopter noise impacts. As a result, impacts would continue to be significant and unavoidable under the Modified Project. Therefore, the Modified Project would not result substantially more severe significant impacts.

Level of Significance Before Mitigation: Impact 5.5-2 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required.

Level of Significance After Mitigation: Impact 5.5-2 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Impact 5.5-3: Would the Modified Project result in generation of excessive groundborne vibration or groundborne noise levels? [Threshold N-2]

Construction Vibration

Potential vibration impacts associated with development projects are usually related to the use of heavy construction equipment during the grading phases of construction. The existing condition of the site shows that the major grading has already occurred, and final grading would use smaller equipment and be for a shorter duration than the original grading. Construction can generate varying degrees of ground vibration depending on the construction procedures and equipment. Construction equipment generates vibration that spreads through the ground and diminishes with distance from the source. The effect on buildings in the vicinity of a construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

Though the nearest identified vibration sensitive receptors to the construction site under the Original Project were the hospital approximately 600 feet to the south, and the single-family residences approximately 367 feet to the north, the 2007 EIR analyzed vibration levels (for both structural damage and vibration annoyance) at a distance of 100 feet. Under the Modified Project, the residence to the north and the hospital to the south would remain the nearest vibration sensitive receptors to the site. At a distance of 100 feet, the 2007 EIR found

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vibration levels to be less than significant. As the Modified Project does not involve construction closer than the Original Project, therefore, there would be no change and no increase in the impacts previously identified.

Operational Vibration

Once constructed, the Modified Project would not contain uses that would generate groundborne vibration. Therefore, impacts would be less than significant. There would be no change and no increase in the impacts previously identified.

Level of Significance Before Mitigation: Impact 5.5-3 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required.

Level of Significance After Mitigation: Impact 5.5-3 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Impact 5.5-4: Would the Modified Project expose people residing or working in the project area to excessive noise levels, for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport? [Threshold N-3]

The Initial Study for the Original Project found that the project would not expose people residing or working in the project area vicinity to excessive airport-related noise. The nearest airport or airstrip to the Modified Project is the French Valley Airport in the City of Murrieta, approximately 6.3 miles to the east. The proximity to an airport or airstrip to the project site would not change under the Modified Project, nor would it expose future residents or workers to excessive noise levels. Therefore, there would be no change and no increase in the impacts previously identified.

Level of Significance Before Mitigation: Impact 5.5-4 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required.

Level of Significance After Mitigation: Impact 5.5-4 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

5.5.6 Cumulative Impacts

Mobile Noise Sources

The 2007 EIR found that cumulative traffic noise increase would be up to 4.1 dBA CNEL. Cumulative traffic noise increases under the Modified Project would be up to 2 dBA CNEL, as shown in Table 5.5-6 *Modified*

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Project's Cumulative Traffic Noise Increase. This would result in a net increase of 13.6 dBA CNEL under cumulative conditions. However, the Approved Project's contribution to the cumulative increase would be 0.4 dBA CNEL. The Modified Project's contribution would be 0.2 dBA CNEL less than previously analyzed. Therefore, the Modified Project would not result substantially more severe significant traffic noise cumulative impacts.

Table 5.5-6 Cumulative Traffic Noise Increase

Roadway	Segment	ADT Volumes			dBA, CNEL	
		2006 No Project	Cumulative No Project ¹	Cumulative Plus Modified Project ¹	Cumulative Noise Increase	Modified Project's Contribution
Inland Valley Road	Prelli Road to Clinton Keith Road	1,545	13,479	14,615	9.8	0.4
Clinton Keith Road	Inland Valley Drive to George Avenue	6,811	42,225	42,963	7.9	0.1
Clinton Keith Road	George Avenue to Arya Road	1,901	43,331	44,069	13.6	0.1
Clinton Keith Road	Arya Road to I-15 NB Ramps	4,495	58,352	59,090	11.1	0.1
Clinton Keith Road	I-15 NB Ramps to I-15 SB Ramps	3,894	49,398	49,796	11.0	0.0
Clinton Keith Road	I-15 SB Ramps to Hidden Springs Road	4,237	43,892	43,949	10.2	0.0
Max Original Project Noise Increase.	-	-	-	-	4.1	0.6
Max Modified Project Noise Increase.	-	-	-	-	13.6	0.4
Net Change	-	-	-	-	9.5	-0.2

Notes: ADT volumes/trip generation data provided by Urban Systems and Traffic Noise Model Calculations included in Appendix 5.5-1.

Traffic noise increase calculated logarithmically using the following equations: Traffic Noise Increase = $10 \log(\text{Cumulative Plus Modified Project}/\text{2006 No Project})$.

¹ Cumulative ADT volumes are updated volumes and provided by Urban Systems.

Construction Noise and Vibration

If construction of the Modified Project were to overlap with cumulative projects in the project vicinity, noise could combine to result in significant cumulative impacts. The traffic study cumulative project development list and aerial figures shows the nearest approved project currently under construction is the Village Retail Center, approximately 650 feet to the north. In addition, an approved project not yet under construction is Grove Park Mix Use Project, approximately 650 feet to the east. This future development could contribute to cumulative construction noise impacts. However, the Modified Project would be required to comply with the City's noise ordinance and mitigation measures from the 2007 EIR. Future projects in the vicinity would also have to comply with the City's noise ordinance and best management practices to ensure construction noise and vibration impacts are less than significant.

5.5.7 Level of Significance Before Additional Mitigation

The following impacts would not result in new significant impacts or substantially increase the severity of impacts identified for the Adopted Specific Plan: Impacts 5.5-1, 5.5-2, 5.5-3 and 5.5-4.

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5.5.8 Additional Mitigation Measures for Modified Project

There would be no additional mitigation measures needed.

5.5.9 Level of Significance After Additional Mitigation

Impacts would be less than significant.

5.5.10 References

California Department of Transportation (Caltrans). 2013, September. Technical Noise Supplement (“TeNS”).

Riverside, County of. December 2015. *Riverside County General Plan*. <https://planning.rctlma.org/General-Plan-Zoning/General-Plan>

Urban Systems. 2021, January. Oak Springs Ranch II Traffic Impact Analysis, Wildomar, California.

Wildomar, City of. September 2020. *Wildomar Municipal Code*. <http://qcode.us/codes//wildomar/>

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5.6 POPULATION AND HOUSING

This section of the Draft Supplemental Environmental Impact Report (DSEIR) evaluates the potential for socioeconomic impacts of the Modified Project in the City of Wildomar, including changes in population and demand for housing, particularly housing cost/rent ranges defined as “affordable.” According to Section 15382 of the CEQA Guidelines, “An economic or social change by itself shall not be considered a significant impact on the environment.” Socioeconomic characteristics should be considered in an EIR only to the extent that they create impacts on the physical environment.

5.6.1 Environmental Setting

5.6.1.1 REGULATORY BACKGROUND

State

California Housing Element Law

California planning and zoning law requires each city and county to adopt a general plan for future growth (California Government Code Section 65300), which must include a housing element that identifies housing needs for all economic segments and provides opportunities for housing development to meet that need. At the state level, the Housing and Community Development Department (HCD) estimates the relative share of California’s projected population growth that would occur in each county based on California Department of Finance population projections and historical growth trends. These figures are compiled by HCD in a Regional Housing Needs Assessment (RHNA) for each region of California. Where there is a regional council of governments, the HCD provides the RHNA to the council. The council then assigns a share of the regional housing need to each of its cities and counties. The process of assigning shares gives cities and counties the opportunity to comment on the proposed allocations. The HCD oversees the process to ensure that the council of governments distributes its share of the state’s projected housing need.

State law recognizes the vital role local governments play in the supply and affordability of housing. To that end, California Government Code requires that the housing element achieve legislative goals to:

- Identify adequate sites to facilitate and encourage the development, maintenance, and improvement of housing for households of all economic levels, including persons with disabilities.
- Remove, as legally feasible and appropriate, governmental constraints to the production, maintenance, and improvement of housing for persons of all incomes, including those with disabilities.
- Assist in the development of adequate housing to meet the needs of low- and moderate-income households.
- Conserve and improve the condition of housing and neighborhoods, including existing affordable housing. Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

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- Preserve for lower income households the publicly assisted multifamily housing developments in each community.

California housing element laws (California Government Code §§ 65580–65589) require that each city and county identify and analyze existing and projected housing needs within its jurisdiction and prepare goals, policies, and programs to further the development, improvement, and preservation of housing for all economic segments of the community commensurate with local housing needs. The City of Wildomar General Plan Housing Element was updated in 2013 for the 2013–2021 cycle.

Housing Accountability Act

The Housing Accountability Act (HAA) requires that cities approve applications for residential development that are consistent with a city's general plan and zoning code development standards without reducing the proposed density. Examples of objective standards are those that are measurable and have clear criteria that are determined in advance, such as numerical setback, height limit, universal design, lot coverage requirement, or parking requirement. Under the HAA, an applicant is entitled to the full density allowed by the zoning and/or general plan provided the project complies with all objective general plan, zoning, and subdivision standards and provided that the full density proposed does not result in a specific, adverse impact on public health and safety and cannot be mitigated in any other way.

Assembly Bill (AB) 648 amends the HAA by increasing the documentation and standard of proof required for a local agency to legally defend its denial of low-to-moderate-income housing development projects. If the local agency considers the housing development project to be inconsistent, not in compliance, or not in conformity, this Bill requires the local agency to give the applicant, within specified time periods, written documentation identifying the provision or provisions and an explanation of the reason or reasons it considers the housing development to be inconsistent, not in compliance, or not in conformity. If the local agency fails to provide this documentation, the housing development project is deemed consistent, compliant, and in conformity with the applicable plan, program, policy, ordinance, standard, requirement, or other similar provision.

AB 1515: Reasonable Person Standard

AB 1515 specifies that a housing development project is deemed consistent, compliant, and in conformity with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision if there is substantial evidence that would allow a reasonable person to conclude that the housing development project or emergency shelter is consistent, compliant, or in conformity. This Bill added additional findings related to the Housing Accountability Act in this regard.

Senate Bill 330 (SB 330)

SB 330 Housing Crisis Act of 2019 states that until January 1, 2025, an application would be deemed complete if a preliminary application was submitted and it complied with the applicable objective general plan and zoning standards in effect at the time. The Planning and Zoning Law requires a public hearing be held on an application for a variance from the requirements of a zoning ordinance or an application for a conditional

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use permit. However, this Bill would prohibit any City or County from conducting more than five hearings held pursuant to these provisions if a housing development project complies with the applicable objective general plan and zoning standards in effect at the time an application is deemed complete. Additionally, this Bill reduces the time for which a lead agency can approve or disapprove a project from 120 days to 90 days.

Regional

Southern California Association of Governments

SCAG is a regional council of governments representing Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties, which encompass over 38,000 square miles. SCAG is the federally recognized metropolitan planning organization (MPO) for this region and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the southern California region's MPO, SCAG cooperates with the South Coast Air Quality Management District, the California Department of Transportation, and other agencies in preparing regional planning documents. The City of Wildomar is within the Western Riverside Council of Governments (WRCOG) subregion of SCAG.

Regional Transportation Plan/Sustainable Community Strategy

SCAG develops regional plans to achieve regional plans to achieve specific regional objectives. On September 3, 2020, SCAG adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), a long-range visioning plan that balances future mobility and housing needs with mobility, economy, healthy/complete communities, and the environment (SCAG 2020a). This long-range plan, which is a requirement of the state of California and the federal government is updated by SCAG every four years as demographic, economic, and policy circumstances change. A component of the RTP/SCS is a set of growth forecasts that estimates employment, population, and housing growth. These estimates are used by SCAG, transportation agencies, and local agencies to anticipate and plan for growth. The most recent jurisdictional growth forecasts are from the 2016–2040 RTP/SCS; the 2020–2045 RTP/SCS lists the 2045 growth forecasts.

Local

The City of Wildomar General Plan

Development of housing in the City is guided by goals, objectives, and policies of the General Plan and Housing Element. The Housing Element includes the following policies on population and land use:

- **Policy H-1:** Ensure there is a sufficient supply of multi-family and single-family zoned land to meet the housing needs identified in the Regional Housing Needs Allocation (RHNA).
- **Policy H-2:** Maintain land use policies that allow residential growth consistent with the availability of adequate infrastructure and public services.

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5.6.1.2 EXISTING CONDITIONS

Population

Table 5.6-1, *Population Trends in Wildomar*, shows the population trends and percent change in the City from 2010 through 2020.

Table 5.6-1 Population Trends in Wildomar

Year	Population	Percent Change
2010	30,637	N/A
2011	31,452	2.66%
2012	32,101	2.06%
2013	32,744	2.00%
2014	33,601	2.62%
2015	34,220	1.84%
2016	34,775	1.62%
2017	35,492	2.06%
2018	36,162	1.89%
2019	37,126	2.67%
2020	37,183	0.15%

Source: US Census Bureau 2020a., California DOF, E-5 Report

Housing

Housing Growth Trends

Table 5.6-2, *Housing Growth Trends in Wildomar*, shows the rate of housing growth from 2010 to 2018 and how it has varied over the years.

Table 5.6-2 Housing Growth Trends in Wildomar

Year	Housing Units	Percent Change
2010	10,509	N/A
2011	10,640	1.25%
2012	10,819	1.68%
2013	10,873	0.50%
2014	10,626	-2.27%
2015	10,456	-1.60%
2016	10,322	-1.28%

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Table 5.6-2 Housing Growth Trends in Wildomar

Year	Housing Units	Percent Change
2017	10,422	0.97%
2018	10,583	1.54%
2019	11,554	9.18%
2020	11,584	0.26%

Source: US Census Bureau 2020b., California DOF, E-5 Report

Regional Housing Needs Assessment

As shown in Table 5.6-3, *City of Wildomar 2013–2021 RHNA*, Wildomar's RHNA allocation for the 2013–2021 planning period is 2,535 units. This number was calculated by SCAG based on the City's share of the region's employment growth, migration and immigration trends, and birth rates.

Table 5.6-3 City of Wildomar 2013–2021 RHNA

Income Category (% of County AMI) ¹	Income Range ²	Number of Units
Extremely Low Income	\$0–\$20,100	310
Very Low	\$20,101–\$33,500	311
Low	\$33,501–\$53,600	415
Moderate	\$53,601–\$78,000	461
Above Moderate	\$78,001 or more	1,038
Total	-	2,535

Source: Wildomar 2013.

¹ AMI = area median income

² Based on a four-person household

Employment

Employment Trends

According to the California Employment Development Department, the average employment rate in Wildomar increased from 2010 to 2019. The average annual employment rate and percent changes are shown in Table 5.6-4, *Average Employment Trends in Wildomar*.

Table 5.6-4 Average Employment Trends in Wildomar

Year	Employment (persons)	Percent Change
2010	13,200	N/A
2011	13,300	0.76%
2012	13,600	2.26%

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Table 5.6-4 Average Employment Trends in Wildomar

Year	Employment (persons)	Percent Change
2013	14,000	2.94%
2014	15,000	7.14%
2015	15,400	2.67%
2016	15,800	2.60%
2017	16,400	3.80%
2018	16,800	2.44%
2019	17,100	1.79%

Source: EDD 2020.

Existing Employment

Table 5.6-5, *Wildomar's Industry by Occupation (2010 and 2018)*, shows the City's total workforce by occupation and industry during 2010 and 2018. According to the estimates of the US Census Bureau, Wildomar had an employed civilian labor force (16 years and older) of 13,823 in 2010 and 16,073 in 2018. The three largest occupational categories during 2010 were Educational Services, and health care and social assistance; Professional, scientific, and management, and administrative and waste management services; and Construction, and 2018 were Educational Services, and health care and social assistance; Arts, entertainment, and recreation, and accommodation and food services; and Professional, scientific, and management, and administrative and waste management services.

Table 5.8-5 Wildomar's Industry by Occupation (2010 and 2018)

Industry/Occupation	Number of Employees in 2010	Number of Employees in 2018	Percent Change
Agriculture, forestry, fishing and hunting, and mining	113	203	79.65%
Construction	1,874	1,706	-8.96%
Manufacturing	1,566	1,733	10.66%
Wholesale Trade	387	325	-16.02%
Retail trade	1,436	1,599	11.35%
Transportation and warehousing, and utilities	712	776	8.99%
Information	194	192	-1.03%
Finance and insurance, and real estate and rental and leasing	726	844	16.25%
Professional, scientific, and management, and administrative and waste management services	1,716	1,972	14.92%
Educational services, and health care and social assistance	2,267	3,185	40.49%
Arts, entertainment, and recreation, and accommodation and food services	1,553	2,033	30.91%
Other services, except public administration	609	847	39.08%

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Table 5.8-5 Wildomar's Industry by Occupation (2010 and 2018)

Industry/Occupation	Number of Employees in 2010	Number of Employees in 2018	Percent Change
Public administration	670	658	-1.79%
Total	13,823	16,073	16.3%

Source: US Census Bureau 2020c.

Note: Numbers of employees were rounded up to the nearest whole number. Employment figures count civilian employees 16 years and older.

Growth Projections

Southern California Association of Governments

SCAG undertakes comprehensive regional planning with an emphasis on transportation. The 2016–2040 RTP/SCS provides the most current projections of population, households, and total employment for Wildomar; the 2020–2045 RTP/SCS provides the 2045 growth projections. Based on the City's share of California's and the region's employment growth, migration and immigration trends, and birth rates, SCAG projects that population, housing, and employment will grow at an increasing rate in Wildomar until 2040, and in 2045, population and employment would decrease while housing would continue to increase. These projections are summarized in Table 5.6-6, *SCAG Growth Projections for Wildomar*.

Table 5.6-6 SCAG Growth Projections for Wildomar

	2020	2035	2040	2045
Population	38,700	53,700	56,200	55,200
Households	12,900	17,300	18,100	19,600
Housing Units ¹	12,255	16,435	17,195	18,620
Employment	8,800	12,900	13,500	11,200
Jobs-Housing Ratio	0.72	0.78	0.79	0.60

Source: SCAG 2016 and SCAG 2020b.

¹ Housing units in SCAG projections are estimated based on number of households and a healthy vacancy rate of 5 percent.

Jobs-Housing Ratio

The jobs-housing ratio is a general measure of the number of jobs versus housing in a defined geographic area, without regard to economic constraints or individual preferences. The jobs-housing ratio, as well as the type of jobs versus the price of housing, has implications for mobility, air quality, and the distribution of tax revenues. A project's effect on the jobs-housing ratio is one indicator of how it will affect growth and quality of life in the project area. SCAG applies the jobs-housing ratio at the regional and subregional levels in order to analyze the fit between jobs, housing, and infrastructure. A main focus of SCAG's regional planning efforts has been to improve this balance; however, jobs-housing goals and ratios are only advisory. There is no ideal jobs-housing ratio adopted in state, regional, or city policies. The American Planning Association is an authoritative resource for community planning best practices, including recommendations for assessing

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jobs-housing ratios. Although it recognizes that an ideal jobs-housing ratio will vary across jurisdictions, it recommends a target of 1.5 and a range of 1.3 to 1.7 (Weitz 2003).

As shown in Table 5.6-6, based on SCAG's growth projections, Wildomar is projected to be a housing-rich community, with the number of housing units increasing at a faster rate than the number of jobs.

5.6.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- P-1 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).
- P-2 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

5.6.3 The 2007 Approved Project (Original Project)

According to the 2007 EIR, impacts to Population and Housing were deemed to be less than significant in the Initial Study, and therefore, were not analyzed in the EIR. The Original Project was expected to construct 103 single-family homes which would result in 267 residents.¹

5.6.4 Applicable Mitigation Measures from the 2007 EIR

As impacts to Population and Housing were found to be less than significant in the Initial Study, the EIR provided no mitigation measures.

5.6.5 Environmental Impacts of the Modified Project

Impact 5.6-1: Would the Modified 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)? [Threshold P-1]

The following describes the potential impacts associated with construction and operation of 288 multifamily dwelling units instead of the 103 single family dwelling units approved under the Original Project.

Construction

Construction of the Modified Project would require contractors and laborers. Because of the size of the Modified Project, the City expects that the supply of general construction labor would be available from the

¹ 267 residents are based on Riverside County's average household size of 2.59 persons per single-family household in Wildomar, per Ordinance 460 (2007 EIR).

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local and regional labor pool. The Modified Project would not result in a long-term increase in employment from short-term construction activities.

Population

Based on the California Department of Finance (DOF) Table E-5, the average household in Wildomar is 3.31 persons per household (DOF 2020a). Once the Modified Project is complete, the 288 multifamily dwelling units would be expected to add 953 residents.² When compared to the 2020 estimated population of 37,183, the Modified Project would result in an approximately 2.56 percent increase in Wildomar's population (DOF 2020b).³ As shown in Table 5.6-6, SCAG's estimated 2045 population for Wildomar is 55,200, which is an increase of 18,017 residents from the DOF 2020 estimated population of 37,183 residents. The potential 953 new residents of the Modified Project would comprise 6.15 percent of the proposed 25-year increase of 15,500 residents for the City based on the SCAG RTP/SCS projections. The SCAG projection estimated a 2020 population of 38,700 for the City, which is an increase of 1,517 residents from the DOF 2020 population estimate (37,183 residents). If the Modified Project's population is added to the existing DOF population estimate, the resulting population of 38,136 residents⁴ remains below the SCAG 2020 projection of 38,700. Therefore, implementation of the Modified Project would not exceed SCAG population projections.

Housing

As shown in Table 5.6-6, the regional SCAG housing unit estimate for 2020 is 12,255 units which more than the current DOF estimate of 11,584 housing units. The new 288 units would increase housing in the City by 2.35 percent (from the SCAG estimate) and would represent 4.53 percent of the City's forecast housing growth of 6,365 units from 2020 to 2045 (see Table 5.6-6). The Modified Project would be within SCAG's projected housing growth. Moreover, the state of California has a shortage of housing. In 2019, Governor Newsom signed several bills aimed to address the need for more housing including the Housing Crisis Act of 2019 (Senate Bill 330). The Modified Project (288 multifamily dwelling units) addresses the need for additional housing to accommodate population growth in the City, by increasing the number of dwelling units approved under the Original Project (103 single-family dwelling units).

Jobs-Housing Balance

A project's effect on the jobs-housing balance is an indicator of how it will affect growth and quality of life in the project area. The jobs-housing ratio for the City is housing-rich (0.72 jobs per dwelling unit; see Table 5.6-6). The Modified Project would decrease the jobs-housing ratio to 0.70 jobs per dwelling unit by adding 288 additional dwelling units.

² 288 units x 3.31 = 953.28 = 953 residents

³ Total 2020 population estimate for Wildomar is as of January 1, 2020 (DOF 2020b).

⁴ 37,183 (DOF 2020 Population) + 953 (proposed residents) = 38,136 residents

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Summary

Overall, the Modified Project would not induce substantial population growth in the area, but would serve growth already projected to occur. Although the Modified Project would increase the number of housing units and population within the City by 288 units and 953 residents, the projected increases would help alleviate the state's housing shortage and would slightly decrease the City's jobs-housing balance.

Although the Original Project was expected to generate 267 residents, which is 686 fewer residents than the Modified Project's population generation of 953 residents, as substantiated above, the Modified Project would not exceed the SCAG population projections, and therefore, impacts would be less than significant. Similarly, the Modified Project proposes to construct 288 dwelling units, which is 185 dwelling units more than the approved 103 dwelling units under the Original Project. However, as substantiated above, the Modified Project would not exceed SCAG's housing growth projections, and as a result of California's housing shortage, the increase in housing proposed under the Modified Project would help alleviate this shortage.

The Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects, and the Modified Project would not result in new or more significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.6-1 would be less than significant.

Additional Mitigation Measures for the Modified Project

No mitigation measures are required.

Level of Significance After Mitigation: Impact 5.6-1 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Impact 5.6-2: Would the Modified Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? [Threshold P-2]

The project site is currently vacant. The Modified Project would result in the development of 288 multifamily dwelling units instead of the 103 single-family dwelling units approved under the Original Project. According to RHNA for the 2013-2021 Housing Element cycle, the City's share of regional housing needs is 2,535 new units. As the project site is currently vacant, the Modified Project would not displace people and/or housing, but would help the City meet its regional housing needs goal by increasing the supply of housing units in the City compared to existing conditions.

Level of Significance Before Mitigation: Impact 5.6-2 would be less than significant.

Additional Mitigation Measures for the Modified Project

No mitigation measures are required.

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Level of Significance After Mitigation: Impact 5.6-2 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

5.6.6 Cumulative Impacts

The area considered for cumulative impacts is the region covered by SCAG. Impacts are analyzed using the General Plan projections in SCAG's 2016 and 2020 RTP/SCS growth forecasts. Development of the Modified Project, in conjunction with related cumulative projects in the City would not result in cumulative citywide population, housing, or employment impacts because the growth assumed under the Modified Project is within the City and SCAG's growth projections. Furthermore, the Modified Project would neither displace housing onsite nor contribute to the displacement of housing on other sites within the region. Upon approval, the Modified Project would increase the City's existing housing supply by 185 dwelling units compared to the Original Project. Therefore, the Modified Project, combined with related projects, would not result in cumulatively considerable impacts to population and housing.

5.6.7 Level of Significance Before Additional Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, all impacts would be less than significant.

5.6.8 Additional Mitigation Measures for Modified Project

No mitigation measures are required.

5.6.9 Level of Significance After Additional Mitigation

Impacts would be less than significant.

5.6.10 References

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5. Environmental Analysis

5.7 PUBLIC SERVICES

This section of the Draft Supplemental Environmental Impact Report (DSEIR) evaluates the potential for the Modified Project to impact public services and facilities, including fire protection and emergency services, police protection, and library services.

5.7.1 Fire Protection and Emergency Services

5.7.1.1 ENVIRONMENTAL SETTING

Regulatory Background

International Fire Code

The International Fire Code (IFC) is a model code for regulating minimum fire-safety requirements for new and existing buildings, facilities, storage, and processes. The IFC includes general and specialized technical fire- and life-safety regulations, which topic addressing fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire, and explosion hazards safety, use and storage of hazardous materials, protection of emergency responders, industrial processes, and various other topics. The IFC is issued by the International Code Council, which is an international organization of building officials.

State

California Fire Code

The California Fire Code (CFC; California Code of Regulations, Title 24, Part 9) is based on the 2015 IFC and includes amendments from the State of California fully integrated into the code. The CFC contains fire safety-related building standards that are referenced in other parts of Title 24 of the California Code of Regulations. The CFC is updated once every three years; the 2019 CFC took effect on January 1, 2020.

California Health and Safety Code

Sections 13000 et seq. of the California Health and Safety Code include fire regulations for building standards (also in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

Regional

Riverside County Fire Department

The Riverside County Fire Department assigns conditions to each set of plans it receives. All conditions must be satisfied prior to Fire Final Inspection. All construction or modification to Fire Systems shall not be started until plans have been submitted and approved. Any changes made to the approved construction or materials used, in a Fire System, must be approved prior to Final Inspection.

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Local

City of Wildomar Municipal Code

Section 8.28.010, Findings and Adoption, of Wildomar's Fire Code (City of Wildomar Municipal Code Chapter 8.28, Fire Code) states that the 2019 edition of the California Fire Code has been adopted as the City's fire code.

City of Wildomar General Plan

The City of Wildomar General Plan contains policies that support the City's public services.

- **Policy LU-5.1:** Ensure that development does not exceed the ability to adequately provide supporting infrastructure and services, such as libraries, recreational facilities, transportation systems, and fire/police/medical services. (AI 3, 4, 74)
- **Policy LU-5.2:** Monitor the capabilities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service. (AI 3, 4, 32, 74)
- **Policy LU-9.1:** Require that new development contribute their fair share to fund infrastructure and public facilities such as police and fire facilities. (AI 3)
- **Policy LU-9.2:** Require a fiscal impact analysis for specific plans and major development proposals so as not to have a negative fiscal impact on the County. (AI 3)
- **Policy S-5.1:** Develop and enforce construction and design standards that ensure that proposed development incorporates fire prevention features through the following:
 - All proposed construction shall meet minimum standards for fire safety as defined in the County Building or Fire Codes, or by County zoning, or as dictated by the Building Official or the Transportation Land Management Agency based on building type, design, occupancy, and use.
 - In addition to the standards and guidelines of the Uniform Building Code and Uniform Fire Code fire safety provisions, continue additional standards for high-risk, high occupancy, dependent, and essential facilities where appropriate under the Riverside County Fire Protection Ordinance. These shall include assurance that structural and nonstructural architectural elements of the building will not:
 - Impede emergency egress for fire safety staffing/personnel, equipment, and apparatus; nor
 - Hinder evacuation from fire, including potential blockage of stairways or fire doors.

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- Proposed development in Hazardous Fire areas shall provide secondary public access, unless determined otherwise by the County Fire Chief.
- Proposed development in Hazardous Fire areas shall use single loaded roads to enhance fuel modification areas, unless otherwise determined by the County Fire Chief.
- **Policy S-5.5:** Conduct and implement long-range fire safety planning, including stringent building, fire, subdivision, and municipal code standards, improved infrastructure, and improved mutual aid agreements with the private and public sector.
- **Policy S-5.6:** Ensure coordination between the Fire Department and the Transportation Land Management Agency, Environmental Health Department and private and public water purveyors to improve firefighting infrastructure, during implementation of the County's capital improvement programs, by obtaining:
 - Replacement and/or relocation of old cast-iron pipelines and inadequate water mains when street improvements are planned;
 - Assessment of impact fees as a condition of development; and
 - Redundant emergency distribution pipelines in areas of potential ground failure or where determined to be necessary.
- **Policy S-5.8:** Periodically review inter-jurisdictional fire response agreements, and improve fire fighting resources as recommended in the County Fire Protection Master Plan to keep pace with development, including construction of additional high-rises, mid-rise business parks, increasing numbers of facilities housing immobile populations, and the risk posed by multiple ignitions, to ensure that (AI 4, AI 88):
 - Fire reporting and response times do not exceed those listed in the County Fire Protection Master Plan identified for each of the development densities described;
 - Fire flow requirements (water for fire protection) are consistent with Insurance Service Office (ISO) recommendations; and
 - The planned deployment and height of aerial ladders and other specialized equipment and apparatus are sufficient for the intensity of development desired.
- **Policy S-5.9:** Continue County Fire Department collaboration with the Transportation Land Management Agency (TLMA) to update development guidelines for the urban/wildland interface areas. These guidelines should include increasing the development area to at least 30 feet past the usual boundary (AI 88).
- **Policy S-5.10:** Continue to utilize the Riverside County Fire Protection Master Plan as the base document to implement the goals and objectives of the Safety Element.

Development Impact Fees

The City of Wildomar established these fees to fund new fire protection facilities (Wildomar 2018a):

- Single-Family Residential: \$440 per dwelling unit
- Multi-Family Residential: \$312 per dwelling unit
- Commercial/Retail: \$295 per 1,000 square feet of building space
- Office/Business Park: \$380 per 1,000 square feet of building space

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- Light Industrial/Warehousing: \$170 per 1,000 square feet of building space

Existing Conditions

The City has one fire station, Riverside County Fire Department (RCFD) Fire Station #61, located at 32637 Gruwell Street in Wildomar, that serves the entire City, including the project site. RCFD Fire Station #61 is approximately 2.30 miles northwest of the project site. In addition to RCFD Fire Station #61, several other Riverside County and Murrieta Fire Department stations in the surrounding area would be able to provide fire protection services to the project site under mutual aid agreements if needed.

According to the Wildomar General Plan, the project site is located in a high fire hazard severity zone (HFHSZ).

5.7.1.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

FP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.

5.7.1.3 THE 2007 APPROVED PROJECT (ORIGINAL PROJECT)

The 2007 EIR stated that fire protection service were eliminated as a topic for evaluation in the Initial Study; however, an updated version of facility information for fire protection services was presented in the 2007 EIR. The 2007 EIR determined that the Original Project would not result in an increase in demand for fire protection services. According to the 2007 EIR, the Riverside County Fire Protection Master Plan requires that an Urban-Category II level of service be provided for the service area; the service criterion requires a fire station within three miles of all areas of the project. As indicated in the 2007 EIR, the project site is within three miles of RCFD Fire Station #61 and Fire Station #75. The 2007 EIR indicated that agreements with Murrieta and the California Department of Forestry and Fire Protection (CDF) Protection Mutual Aid System would provide any additional resources necessary to mitigate fire emergencies. Additionally, the 2007 EIR indicated that the Original Project would be required to pay development impact fees. Impacts were found to be less than significant.

5.7.1.4 APPLICABLE MITIGATION MEASURES FROM THE 2007 EIR

All impacts were less than significant; no mitigation measures were proposed in the 2007 EIR.

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5.7.1.5 ENVIRONMENTAL IMPACTS OF THE MODIFIED PROJECT

Impact 5.7-1: Would the Modified Project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services? [Threshold FP-1]

The Modified Project would develop 288 multifamily units in lieu of the Original Project's 103 single-family dwelling units which would increase the demand for fire and emergency services.

The RCFD Fire Station #61 is the primary fire station providing service to the project site, and is approximately 2.30 miles northwest of the project site. The Modified Project would likely increase the number of service calls and demand for fire services compared to the Original Project. However, the Modified Project would comply with the California Fire and Building Codes and City ordinances. As part of the Modified Project Review the project plans and notice of preparation were provided to the Fire Department. The Department has not indicated any service issues with either the design or the size of the project. According to the General Plan EIR, impacts to fire protection are considered significant if there is an increase in response times more than seven minutes for urban areas or 20 minutes in rural areas as established by the Riverside County Fire Department (RCFD). As the fire station is within 3 miles of the project site, the response time is anticipated to be within the standard. A standard condition of approval for the projects in the City requires compliance with the requirements of the RCFD and the payment of standard City development impact fees, which include a fee for fire service impacts. As with the Original Project, the Modified Project is not expected to result in activities that create unusual fire protection needs.

The Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects, and the Modified Project would not result in new or more significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.7-1 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required.

Level of Significance After Mitigation: Impact 5.7-1 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

5.7.1.6 CUMULATIVE IMPACTS

Growth within the City would increase demands for fire protection and emergency services. As with the Original and Modified Projects, other projects would also pay development impact fees which would be available for the RCFD Fire Station #61's operations and construction of new and/or expanded fire stations, if required. Other projects that are found by the City to require increases in public safety equipment, facilities,

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and staffing would also be required to pay fair-share payments for increased resources. Cumulative impacts would be less than significant after the payment of impact fees by other projects, and impacts of the Modified Project, as with the Original Project, would not be cumulatively considerable.

5.7.1.7 LEVEL OF SIGNIFICANCE BEFORE ADDITIONAL MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, Impact 5.7-1 would be less than significant.

5.7.1.8 ADDITIONAL MITIGATION MEASURES FOR MODIFIED PROJECT

No mitigation measures are required.

5.7.1.9 LEVEL OF SIGNIFICANCE AFTER ADDITIONAL MITIGATION

Impacts would be less than significant.

5.7.2 Police Protection

5.7.2.1 ENVIRONMENTAL SETTING

Regulatory Background

Local

City of Wildomar General Plan

The City of Wildomar General Plan contains policies that support the City's public services.

- **Policy LU-5.1:** Ensure that development does not exceed the ability to adequately provide supporting infrastructure and services, such as libraries, recreational facilities, transportation systems, and fire/police/medical services. (AI 3, 4, 74)
- **Policy LU-5.2:** Monitor the capabilities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service. (AI 3, 4, 32, 74)
- **Policy LU-9.1:** Require that new development contribute their fair share to fund infrastructure and public facilities such as police and fire facilities. (AI 3)
- **Policy LU-9.2:** Require a fiscal impact analysis for specific plans and major development proposals so as not to have a negative fiscal impact on the County. (AI 3)

Development Impact Fees

The City of Wildomar established these fees to fund new police protection facilities (Wildomar 2015):

- Single-Family Residential: \$227 per dwelling unit

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- Multi-Family Residential: \$161 per dwelling unit
- Commercial/Retail: \$153 per 1,000 square feet of building space
- Office: \$196 per 1,000 square feet of building space
- Industrial/Business Park: \$87 per 1,000 square feet of building space

Existing Conditions

Police protection services are provided in Wildomar by the Riverside County Sheriff's Department (RCSD), with local policing directed from the Lake Elsinore Sheriff's station located at 333 Limited Avenue in Lake Elsinore, approximately 7.3 miles northwest of the project site.

5.7.2.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

PP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

5.7.2.3 THE 2007 APPROVED PROJECT (ORIGINAL PROJECT)

The 2007 EIR eliminated the evaluation of police protection services in the Initial Study; however, information on police protection services indicated additional recommendations that would protect residents during the construction and operation of the Original Project. The 2007 EIR found that implementation of the Original Project would increase demands for police services. The 2007 EIR stated that while the Original Project would add to the existing demand for police services, incremental impacts would be mitigated through the payment of development impact fees and Fee Ordinance No. 659.6 of the County of Riverside. In addition to the payment of fees, the RCSD provided the following recommendations:

- Preconstruction and Construction Phases
 - Provide site security during construction. The RCSD recommends using bonded security guards licensed by the State of California Bureau of Security and Investigative Services Department to handle project security.
 - Prior to project completion, the surfaces of walls, fences, buildings, logo monuments, etc. should be graffiti-resistant through either surface composition, applied paint type, and/or planned shielding by landscaping or plants.
 - Prior to construction of any structure, a material storage area should be established and enclosed by a six-foot chainlink fence to minimize theft of materials and/or equipment.

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- A list of serial and/or license numbers of equipment stored at the location should be maintained both at the site and at any off-site main office. Access of public and nonessential employees to the construction areas should be restricted.
- The developer and/or builder's name, address, and phone number should be conspicuously posted at the construction site. Visibility into the construction site should not be intentionally hampered. Areas actually under construction should be lit during hours of darkness. All entrances and exits should be clearly marked.
- Addressing
 - Address numbers should be illuminated during the hours of darkness and positioned to be readily readable from the street. Street address numbers should be positioned strategically on elevated sections of the building to facilitate unhampered views from vehicular and pedestrian vantage points.
- Security Systems
 - Silent or audible alarm systems should be installed. Comprehensive security systems should be provided for the following: perimeter building and access route protection, high-valued storage areas, and the interior building door to the shipping and receiving area. Closed-circuit TV security cameras are recommended.
- Doors
 - Adequate security hardware, such as deadbolt locks, should be installed. All glass doors should be secured with deadbolts.
- Windows
 - Louvered windows should not be used. Large windows and any windows accessible from the site and rear but not visible from the street shall consist of rated burglary-resistant glazing or its equivalent.
- Rooftops and Openings
 - If the building has skylights, one of the following shall be utilized for every skylight:
 - Rated burglary-resistant glass or acrylic material,
 - Iron bars of at least half-inch diameter, or flat steel bars of at least quarter-inch width, spaced no more than five inches apart under the skylight and security fastened, or
 - Grill of at least eighth-inch steel and two-inch mesh.
 - All hatchway openings on the roof of any building shall be secured.
 - Exterior rooftop ladders should be eliminated or incorporated into the interior design.
 - All air duct or air vent openings exceeding 8 inches by 12 inches on the rooftop or exterior walls of any building shall be secured by means of:
 - Iron bars of at least half-inch diameter, or flat steel bars of at least quarter-inch width, spaced no more than five inches, and securely fastened,
 - Grill of at least eighth-inch steel and two-inch mesh, and/or
 - If the barrier is on the outside, it shall be secured with galvanized rounded-head, flush bolts of at least three-eighths-inch diameter.

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■ Lighting

- Interior nightlights shall be used during hours of darkness when premises are closed for business.
- Parking lots and associated carports, driveways, circulation areas, aisles, passageways, recesses, and grounds contiguous to buildings shall be provided with lighting of sufficient wattage to provide adequate illumination to make clearly visible the presence of any person on or about the premises from at least 25 feet away during the hours of darkness.
- All exterior doors shall have their own light source, which will adequately illuminate entry/exit areas at all hours in order to:
 - Make any person on the premises clearly visible, and
 - Provide adequate illumination for persons entering and exiting the building.

■ Landscaping

- Landscaping shall be of the type and situated in locations to maximize observation while providing the desired degree of aesthetics. Security planting materials are encouraged along fence and property lines and under vulnerable windows. Landscaping shall not conceal doors or windows from view, obstruct visibility of the parking lot from the street or from business buildings, nor provide access to the roof or windows.

■ Line of Sight/Natural Surveillance

- Wide-angled peepholes should be designed into solid doors and located in areas where natural surveillance is compromised, and which will be utilized by employees to access parking lots and pedestrian paths during the hours of darkness.
- Single- and double-binned trash enclosures should be located at the perimeter of the parking lot, not adjacent to buildings or contiguous to exterior building doors.
- Other line-of-sight obstructions (including recessed doorways, alcoves, etc.) should be avoided on building exterior walls and interior hallways.
- Employees and/or security personnel should be positioned in areas where they can not only monitor subjects entering and exiting the businesses but can survey restroom entrances.

■ Signage/Parking Lot

- All entrances to parking areas shall be posted with appropriate signs per 22658(a) C.V.C., to assist in removal of vehicles at the property owner's/manager's request.

5.7.2.4 APPLICABLE MITIGATION MEASURES FROM THE 2007 EIR

All impacts were less than significant; no mitigation measures were proposed in the 2007 EIR.

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5.7.2.5 ENVIRONMENTAL IMPACTS OF THE MODIFIED PROJECT

Impact 5.7-2: Would the Modified Project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services? [Threshold PP-1]

The Modified Project would develop 288 multifamily dwelling units in lieu of the Original Project's 103 single-family dwelling units which would slightly increase the demand for police protection services.

The RCSD station in Lake Elsinore is the primary sheriff's station providing service to the project, and is approximately 7.3 miles northwest of the site. The Modified Project would likely slightly increase the number of service calls and demand for police protection compared to the Original Project due to the increase in dwelling units.

For the purpose of establishing acceptable levels of service, the Sheriff's Department strives to maintain a recommended servicing of 1.2 sworn law enforcement personnel for every 1,000 residents (Wildomar 2018b). The Modified Project is not anticipated to induce substantial growth in the area, but would serve to provide housing for a portion of the projected population growth of the City, and therefore, would not be expected to substantially increase the demand for police protection services or require new facilities. Regardless, as a standard condition of approval for projects in the City, the project applicant is required to pay standard development impact fees, which include a fee for police service impacts to offset potential demand associated with development. As with the Original Project, the Modified Project is not expected to result in activities that create unusual police protection needs.

The Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects, and the Modified Project would not result in new or more significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.7-2 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required.

Level of Significance After Mitigation: Impact 5.7-2 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

5.7.2.6 CUMULATIVE IMPACTS

Growth within the City would increase demands for police protection services. As with the Original and Modified Projects, other projects would also pay development impact fees which would be available for the RCSD's operations and construction of new and/or expanded sheriff stations. Other projects that are found by the City to require increases in public safety equipment, facilities, and staffing would also be required to pay

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fair-share payments for increased resources. Cumulative impacts would be less than significant after the payment of impact fees by other projects, and impacts of the Modified Project, as with the Original Project, would not be cumulatively considerable.

5.7.2.7 LEVEL OF SIGNIFICANCE BEFORE ADDITIONAL MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, Impact 5.7-2 would be less than significant.

5.7.2.8 ADDITIONAL MITIGATION MEASURES FOR MODIFIED PROJECT

No mitigation measures are required.

5.7.2.9 LEVEL OF SIGNIFICANCE AFTER ADDITIONAL MITIGATION

Impacts would be less than significant.

5.7.3 School Services

5.7.3.1 ENVIRONMENTAL SETTING

Regulatory Background

State

California State Assembly Bill 2926: School Facilities Act of 1986

To assist in providing school facilities to serve students generated by new development, Assembly Bill (AB) 2926 was enacted in 1986 and authorizes a levy of impact fees on new residential and commercial/industrial development. The bill was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 et seq. to the Government Code. Under this statute, payment of impact fees by developers serves as CEQA mitigation to satisfy the impact of development of school facilities.

California Senate Bill 50

Senate Bill (SB) 50, passed in 1998, provides a comprehensive school facilities financing and reform program and enables a statewide bond issue to be placed on the ballot. Under the provisions of SB 50, school districts are authorized to collect fees to offset the costs associated with increasing school capacity as a result of development and related population increases. The funding goes to acquiring school sites, constructing new school facilities, and modernizing existing school facilities. SB 50 establishes a process for determining the amount of fees developers would be charged to mitigate the impact of development on school districts from increased enrollment. According to Section 65996 of the California Government Code, development fees authorized by SB 50 are deemed to be “full and complete school facilities mitigation.”

Under the legislation, there are three levels of developer fees that may be imposed upon new development by the governing school district. Level I fees are assessed based upon the proposed square footage of residential, commercial/industrial, and/or parking structure uses. Level II fees require the developer to provide one-half

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of the costs of accommodating students in new schools, and the state provides the remaining half. To qualify for Level II fees, the governing board of the school district must adopt a School Facilities Needs Analysis and meet other prerequisites in accordance with Section 65995.6 of the California Government Code. Level III fees apply if the state runs out of bond funds, allowing the governing school district to impose 100 percent of the cost of school facility or mitigation minus any local dedicated school monies on the developer.

Existing Conditions

The Lake Elsinore Unified School District (LEUSD) covers over 144 square miles and serves TK through 12 students from the cities of Lake Elsinore, Canyon Lake, and Wildomar, as well as several unincorporated Riverside County communities. The District operates 23 schools, as well as alternative education programs. Approximately 21,565 students, grades TK through 12, are served by LEUSD (LEUSD 2021).

5.7.3.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

SS-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for school services.

5.7.3.3 THE 2007 APPROVED PROJECT (ORIGINAL PROJECT)

According to the 2007 EIR, school services were eliminated as a topic for evaluation in the Initial Study; however, research conducted on school service facilities indicated a recent change in the development impact fees. The Original Project estimated that the 103 single-family units would generate 78 students and the 312 multifamily units would generate 236 students. In total the Original Project was estimated to generate 173 elementary school students, 75 middle school students, and 66 high school students. The 2007 EIR stated that the Original Project would create a need for either expansion of facilities or changes in staffing and facilities. The 2007 EIR stated that the need for additional services is addressed by compliance with school impact assessment fees per SB 50, and that the Original Project would be required to pay school impact fees under SB 50. The 2007 EIR stated that payment of these fees would offset impacts from increased demand for school facilities/services by providing adequate financial base to construct and equip new and existing schools.

5.7.3.4 APPLICABLE MITIGATION MEASURES FROM THE 2007 EIR

All impacts were less than significant; no mitigation measures were proposed in the 2007 EIR.

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5.7.3.5 ENVIRONMENTAL IMPACTS OF THE MODIFIED PROJECT

Impact 5.7-3: Would the Modified Project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for school services? [Threshold SS-1]

The Modified Project would develop 288 multifamily dwelling units in lieu of the Original Project's 103 single-family dwelling units which would increase the demand for police protection services.

Table 5.7-1, *LEUSD Student Generation Rates and Student Generation*, show the generation rates and the expected number of students to be generated as a result of the implementation of the Modified Project.

Table 5.7-1 LEUSD Student Generation Rates and Student Generation

School Type	Generation Rate ¹	MODIFIED PROJECT	ORIGINAL PROJECT	
		Student Generation for Proposed 288 Multifamily Units	Student Generation for Proposed 103 Single-Family Units	Student Generation for Existing 312 Multifamily Units
Elementary School	0.28	80.6	28.8	87.3
Middle School	0.15	43.2	15.4	46.8
High School	0.20	57.6	20.6	62.4
Total Student Generation²		181	65	197

Source: Lake Elsinore 2011

¹ Student generation rates differ from those used in the 2007 EIR for the Original Project; therefore, a comparison of student generation for the existing 312 multifamily units and the Original Project's 103 single-family units are also presented in this table.

² Rounded to the nearest number.

As shown in Table 5.7-1, the Modified Project would generate approximately 181 students, whereas the 103 single-family dwelling units assumed in the 2007 EIR would have generated 65 students (when using the updated student generation rates shown in Table 5.7-1). Currently, the City provides a Notice of Impact Mitigation Requirement to an applicant for a building permit, who then works with the school district to determine the precise amount of school impact fees. Once the fee has been paid in full, LEUSD prepares and provides a certificate to the City demonstrating payment of the fee. Payment of fees in compliance with Government Code Section 65996 fully mitigates all impacts to school facilities. Payment of impact fees in compliance with SB 50 would reduce potential impacts to an acceptable level. As with the Original Project, impacts of the Modified Project would be less than significant.

The Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects, and the Modified Project would not result in new or more significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.7-3 would be less than significant.

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Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required.

Level of Significance After Mitigation: Impact 5.7-3 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

5.7.3.6 CUMULATIVE IMPACTS

Growth within the City would increase demand for school services. As with the Original and Modified Projects, other projects would have to pay impact fees which would be available for LEUSD's operations and construction of new and/or expanded school facilities. Other projects that are found by the City to require increases in school facilities and staffing would also be required to pay fair-share payments for increased resources. Cumulative impacts would be less than significant after the payment of impact fees by other projects, and impacts of the Modified Project, as with the Original Project, would not be cumulatively considerable.

5.7.3.7 LEVEL OF SIGNIFICANCE BEFORE ADDITIONAL MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, Impact 5.7-3 would be less than significant.

5.7.3.8 ADDITIONAL MITIGATION MEASURES FOR MODIFIED PROJECT

No mitigation measures are required.

5.7.3.9 LEVEL OF SIGNIFICANCE AFTER ADDITIONAL MITIGATION

Impacts would be less than significant.

5.7.4 Library Services

5.7.4.1 ENVIRONMENTAL SETTING

Regulatory Background

Local

City of Wildomar General Plan

The General Plan contains the following policies for providing library resources to the City:

- **Policy LU-5.1.** Ensure that development does not exceed the ability to adequately provide supporting infrastructure and services, such as libraries, recreational facilities, transportation systems, and fire/police/medical services. (AI 3, 4, 74)
- **Policy LU-5.2:** Monitor the capacities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service.

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Existing Conditions

The Wildomar Branch Library is part of the Riverside County Public Library community library network, which includes branches throughout Riverside County. The Wildomar Branch Library is at 34303 Mission Trail in Wildomar.

5.7.4.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

LS-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for library services.

5.7.4.3 THE 2007 APPROVED PROJECT (ORIGINAL PROJECT)

The 2007 EIR stated that library services were eliminated as a topic for evaluation in the Initial Study; however, updated facility information was provided. The 2007 EIR indicated that the Original Project would increase the need for library services; however, the additional library use at the Mission Trail Library (Wildomar Branch Library) and possibly the Lake Elsinore Library, would absorb these increases. The 2007 EIR indicated that the Riverside County Uniform Mitigation Fee assesses fees to be used to offset the impact of new development on library services in the area. The 2007 EIR indicated that the Mission Trail Library has the capacity to increase the number of volumes by 4,500, and that Year 2001 Facilities Development Impact Fees require that all new development bear its fair share cost of providing facilities (Ordinance No. 659.6). The 2007 EIR indicated that current library facilities are adequate to serve the Modified Project.

5.7.4.4 APPLICABLE MITIGATION MEASURES FROM THE 2007 EIR

All impacts were less than significant; no mitigation measures were proposed in the 2007 EIR.

5.7.4.5 ENVIRONMENTAL IMPACTS OF THE MODIFIED PROJECT

Impact 5.7-4: Would the Modified Project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for library services? [Threshold LS-1]

The only library in the City of Wildomar, Wildomar Branch Library, is approximately 3.55 miles northwest of the project site. According to the Wildomar General Plan EIR, 0.5 square foot of library space is needed per capita; therefore, the Modified Project would generate demand for 477 square feet of library space, which is an increase of 343 square feet from that of the Original Project. It should be noted that the Riverside County Public Library System also provides a wide range of electronic and digitized resources that do not require

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physical library space including eBooks and audiobooks. The required square footage would not warrant the construction of a new library or the expansion of the Wildomar Branch Library as the required square footage is not a substantial increase and the proposed demand for library services could be accommodated through the use of electronic and digitized resources. Additionally, according to the Wildomar General Plan EIR, 2.5 volumes per capita is the minimum standard; therefore, the increase in population would require an additional 2,383 volumes. Funding would be required to provide the additional books to meet the service standard. Generally, impact fees are assessed on new development to help pay for public infrastructure required to accommodate the new development. Funding for library services comes primarily from the property tax revenue, as well as library fines and fees collected from patrons, and state, federal, or government aid. As development occurs, property tax revenue would grow proportionally with the new property tax collections. Therefore, the Modified Project would not have a substantial impact associated with the provision of new or physically altered governmental facilities; impacts of the Modified Project, as with the Original Project would be less than significant.

The Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects, and the Modified Project would not result in new or more significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.7-4 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required.

Level of Significance After Mitigation: Impact 5.7-4 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

5.7.4.6 CUMULATIVE IMPACTS

Growth within the City would increase demand for library services. As with the Original and Modified Projects, other projects would have to pay fees and property taxes which would be available for the operations and development of new and/or expanded library facilities. Other projects that are found by the City to require increases in library facilities and staffing would also be required to pay fair-share payments to the City for increased resources. Cumulative impacts would be less than significant after the payment of impact fees and property taxes by other projects, and impacts of the Modified Project, as with the Original Project, would not be cumulatively considerable.

5.7.4.7 LEVEL OF SIGNIFICANCE BEFORE ADDITIONAL MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, Impact 5.7-4 would be less than significant.

5.7.4.8 ADDITIONAL MITIGATION MEASURES FOR MODIFIED PROJECT

No mitigation measures are required.

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5.7.4.9 LEVEL OF SIGNIFICANCE AFTER ADDITIONAL MITIGATION

Impacts would be less than significant.

5.7.5 References

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Lake Elsinore Unified School District (LEUSD). 2021. About. https://www.leusd.k12.ca.us/apps/pages/index.jsp?uREC_ID=324467&type=d&pREC_ID=732453

Wildomar, City of. 2015, April 23. City of Wildomar Impact Fee Study Update Report. https://cityofwildomar.org/UserFiles/Servers/Server_9894739/File/Business/Documents/Online%20Documents/Wildomar%20DIF%20Program%20-%20Adopted%20June%2010-2015.pdf

- _____. 2018a. City of Wildomar 2018-2019 Annual Report on Development Impact Fees. https://cityofwildomar.org/UserFiles/Servers/Server_9894739/File/Government/Departments/Finance/DIF%20Report%202019/DIF%205YR%20&%20Annual%20Report%20Package%202019.pdf
- _____. 2018b. City of Wildomar Adopted Biennial Operating Budget Fiscal Years 2017-2018 & 2018-2019. https://www.cityofwildomar.org/UserFiles/Servers/Server_9894739/File/Government/Departments/Finance/Budgets/Adopted%20Budget%20City%20of%20Wildomar%20web%202017-19.pdf

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5.8 TRANSPORTATION

This section of the draft supplemental environmental impact report (DSEIR) evaluates the potential for implementation of the Modified Project to result in transportation and traffic impacts in the City of Wildomar. The analysis in this section is based in part on the following technical report:

- *Oak Springs Ranch Phase II Traffic Impact Analysis*, Urban Systems Associates, February 23, 2021 (Urban Systems Associates, Inc. 2021)

This study is included as Appendix 5.8-1 to this Draft SEIR.

5.8.1 Environmental Setting

5.8.1.1 REGULATORY BACKGROUND

State Regulations

Senate Bill 743

On September 27, 2013, SB 743 was signed into law, starting a process that fundamentally changed transportation impact analysis as part of CEQA compliance. SB 743 generally eliminates auto delay, LOS, and other similar measures vehicular capacity or traffic congestion as the sole basis for determining significant impacts under CEQA. Pursuant to the CEQA Guidelines, the new criteria “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (Public Resources Code Section 21099(b)(1)).

Pursuant to SB 743, the Natural Resources Agency adopted revisions to the CEQA Guidelines to implement SB 743 on December 28, 2018. The revised CEQA Guidelines establish new criteria for determining the significance of transportation impacts. Under the new Guidelines, VMT-related metric(s) that evaluate the significance of transportation-related impacts under CEQA for land use are required beginning on July 1, 2020. The legislation does not preclude the application of local general plan policies, zoning codes, conditions of approval, or any other planning requirements that require evaluation of LOS, but these metrics may no longer constitute the basis for determining transportation impacts under the CEQA and a project’s effect on automobile delay shall not constitute a significant environmental impact (CEQA Guidelines Section 15064.3(a)).

Regional Regulations

2016 Regional Transportation Plan/Sustainable Community Strategy

The Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted in April 2016. The RTP/SCS outlines a development pattern for the region which, when integrated with the transportation network and other transportation measures and policies, would reduce greenhouse gas (GHG) emissions from transportation (excluding good movement). The RTP/SCS is meant to provide growth strategies that would achieve the regional GHG emissions reduction targets identified by the California Air Resources Board. However, the

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RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the RTP/SCS; instead, it provides incentives to governments and developers for consistency.

California Department of Transportation

Interstate 15 (I-15) provides regional access to Wildomar. The freeway mainline and intersections within the City of Wildomar associated with on- and off-ramps are under Caltrans jurisdiction. Caltrans approves the planning, design, and construction of improvements for all state-controlled facilities such as I-15. Caltrans uses the Highway Capacity Manual 6 (HCM 6) methodology to evaluate facilities. Caltrans endeavors to maintain a target LOS at the transition between LOS C and LOS D on State highway facilities.

For the freeway mainline, merge and diverge segment analysis is based on peak hour HCM 6 density analysis for freeway-to-arterial interchanges. According to HCM 6 methodology, the ramp merge and diverge segments focus on an influential area of 1,500 feet, including the acceleration or deceleration lane(s) and adjacent freeway ramps. The LOS for freeway merge and diverge segments is determined by traffic density based on criteria outlined in the HCM 6.

Riverside County Transportation Commission Congestion Management Program

The Riverside County Transportation Commission (RCTC) Congestion Management Program (CMP) is updated every two years in accordance with Proposition 11. The CMP was established in the State of California to more directly link land use, transportation, and air quality and to prompt reasonable growth management programs that would more effectively utilize new and existing transportation funds, alleviate traffic congestion and related impacts, and improve air quality. There are no facilities within the study area that are part of the CMP.

Local Regulations

City of Wildomar General Plan

The intent of the goals and policies in the General Plan Circulation Element is to establish a comprehensive multi-modal transportation system that is safe, achievable, efficient, environmentally and financially sound, accessible, and coordinated with Land Use Element.

City of Wildomar Municipal Code

Title 10, Vehicles and Traffic, of the City of Wildomar Municipal Code includes regulations and standards governing parking, transportation demand management program, as well as miscellaneous traffic regulations.

Any modifications to the roadway networks, which includes driveways, curbs, and sidewalks, would be subject to approval by the City of Wildomar, and any construction work within the right-of-way of any public roadway would require the issuance of a permit by the City of Wildomar.

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Impact Fees

The City participates in the Transportation Uniform Mitigation Fee (TUMF), administered by the Western Riverside Council of Governments (WRCOG). Chapter 3.40 of the Wildomar Municipal Code requires payment of TUMF to WRCOG prior to issuance of a certificate of occupancy or final inspection. The City requires written verification of payment of TUMF to WRCOG.

The City has adopted a Development Impact Fee (DIF) that offset development impacts to traffic and parks. Chapter 3.44 requires payment of the DIF prior to issuance of a certificate of occupancy.

5.8.1.2 EXISTING CONDITIONS

As noted above, effects of a project on roadway capacity are no longer considered effects under CEQA. The following information related to level of service is provided for informational purposes only.

Traffic Study Area

Intersections

Table 5.8-1, *Existing Intersection Analysis*, shows the existing conditions intersection analysis.

Table 5.8-1 Existing Intersection Analysis

Key Intersection	Control	AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
1 Prielipp Road / Inland Valley Drive	Unsignalized	11.3	B	13.3	B
2 Inland Valley Drive / Clinton Keith Road	Signalized	23.9	C	56.1	E
3 George Avenue / Clinton Keith Road	Signalized	31.6	C	39.4	D
4 Oak Creek Mall / Clinton Keith Road	Signalized	28.9	C	36.7	D
5 I-15 NB Ramps / Clinton Keith Road	Signalized	32.5	C	38.6	D
6 I-15 SB Ramps / Clinton Keith Road	Signalized	35.4	D	19.1	B
7 Hidden Springs Road / Clinton Keith Road	Signalized	68.8	E	66.3	E

Source: Urban Systems Associates, Inc. 2021

As shown in Table 5.8-1, in the existing intersection analysis, which includes original entitlement traffic from 103 single-family homes on the project site, all studied intersections would operate at an acceptable LOS D or better in both the AM and PM peak hour except for the following:

- Inland Valley Drive/Clinton Keith Road (PM peak hour)
- Hidden Springs Road/Clinton Keith Road (AM and PM peak hour)

Transportation Uniform Mitigation Fee (TUMF) Program

The Western Riverside Council of Governments (WRCOG) developed the Transportation Uniform Mitigation Fee (TUMF) program to ensure that new developments provide payment for their respective fair share for

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improvements for increased traffic. The TUMF is expected to generate nearly \$3 billion for transportation projects in Western Riverside County. TUMF fees are adjusted regularly based on annual inflation adjustments to cover for construction and labor costs. TUMF fees are imposed onto proposed developments such as residential, industrial, and commercial projects.

City of Wildomar Development Impact Fee (DIF) Program

The proposed Oak Springs Ranch II residential project would also be subject to the City of Wildomar's Development Impact Fee Program. The City of Wildomar Impact Fee Study Update Report dated April 23, 2015, provides two chapters (Chapters 3 and 4) which cover roads and traffic signals impact fees.

Southwest Road and Bridge Benefit Districts (RBBD)

Riverside County formed the Road and Bridge Benefit Districts to deal with the growth of its respective cities. The Modified Project lies within Zone A of the Southwest district which lies north of Zone C, south of Lake Elsinore, west of Murrieta and Temecula. The Road and Bridge Benefit Districts were established to provide funding for the cost of road and bridge improvements of an established area. Fees towards the Districts are assessed on new development projects such as the Modified Project as a condition of approval of a final map or as a condition of issuing a building permit with boundaries under the Southwest District.

As it relates to the Modified Project, the Clinton Keith Road Interchange at the I-15 is a facility that is included in the project study area and is expected to be improved via the Southwest RBBD.

Entitlement Intersection Improvements

A list of intersection improvements that were recommended as part of the Original Project entitlement are shown in Table 5.8-2, *Summary of Intersection Improvements*, and were funded by the Original Project through the TUMF, DIF, and RBBD.

Table 5.8-2 Summary of Intersection Improvements

Intersection	Existing Conditions	Existing + Ambient Growth + Project Improvements	Existing + Ambient Growth + Project + Cumulative Improvements
Hidden Springs Road (NS) at:			
• Clinton Keith Road (EW)	• Traffic Signal	• Same	• Same • Construct a right turn lane
○ Westbound			
I-215 SB Fwy. Ramps (NS) at:			
• Clinton Keith Rd. (EW)			• Construct a left turn lane
○ Southbound			• Construct a 2 nd through lane
○ Eastbound			• Free Right Turn Access
○ Westbound			• Construct a 2 nd left turn lane
I-215 NB Fwy. Ramps (NS) at:			• Construct a 2 nd through lane
• Clinton Keith Rd. (EW)			
○ Northbound			

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<ul style="list-style-type: none"> ○ Eastbound ○ Westbound 		<ul style="list-style-type: none"> ● Construct a right turn lane 	<ul style="list-style-type: none"> ● Construct a left turn lane ● Construct a 2nd left turn lane ● Same ● Free Right Turn Access ● Construct a 2nd through lane
Arya Rd. (NS) at: <ul style="list-style-type: none"> ● Clinton Keith Rd. (EW) ○ Westbound 			<ul style="list-style-type: none"> ● Construct a 2nd through lane
George Avenue (NS) at: <ul style="list-style-type: none"> ● Clinton Keith Rd. (EW) ○ Southbound ○ Eastbound ○ Westbound 	<ul style="list-style-type: none"> ● Traffic Signal 	<ul style="list-style-type: none"> ● Same 	<ul style="list-style-type: none"> ● Same ● Construct a left turn lane ● Construct a through lane ● Construct a left turn lane ● Construct a 2nd through lane ● Construct a 2nd through lane ● Construct a right turn lane
<ul style="list-style-type: none"> ● Dwy. 1 (EW) ○ Northbound ○ Southbound ○ Westbound 		<ul style="list-style-type: none"> ● Construct Cross-Street stop signs ● Construct a through lane ● Construct a through lane ● Construct a through lane 	<ul style="list-style-type: none"> ● Same ● Construct a right turn lane ● Construct a right turn lane ● Construct a right turn lane
<ul style="list-style-type: none"> ● Dwy. 2 (EW) ○ Northbound ○ Westbound 		<ul style="list-style-type: none"> ● Construct Cross-Street Stop signs ● Construct a through lane ● Construct a through lane 	<ul style="list-style-type: none"> ● Same ● Construct a right turn lane ● Construct a right turn lane
Dwy. 3 (NS) at: <ul style="list-style-type: none"> ● Clinton Keith Rd. (EW) ○ Northbound ○ Eastbound 		<ul style="list-style-type: none"> ● Construct cross-street stop signs ● Construct a right turn lane 	<ul style="list-style-type: none"> ● Same ● Same ● Construct a 2nd through lane
Inland Valley Dr. (NS) at: <ul style="list-style-type: none"> ● Clinton Keith Rd. (EW) ○ Eastbound 			<ul style="list-style-type: none"> ● Construct a 2nd through lane
Dwy. 4 (EW) <ul style="list-style-type: none"> ● Northbound ● Eastbound 		<ul style="list-style-type: none"> ● Construct cross-section stop signs ● Construct a left turn lane ● Construct a though lane 	<ul style="list-style-type: none"> ● Same ● Same ● Same
Nutmeg St. (NS) at: <ul style="list-style-type: none"> ● Jackson Ave. (EW) 	<ul style="list-style-type: none"> ● Traffic Signal 	<ul style="list-style-type: none"> ● Same 	<ul style="list-style-type: none"> ● Same

Source: Urban Systems Associates, Inc. 2021

The improvements shown in Table 5.8-2 have been completed and are fully functional except for the following:

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- Driveway #4 at Inland Valley Drive
 - Construct an exclusive northbound left turn lane
 - Construct an exclusive southbound right turn lane
 - Construct an eastbound through lane

These improvements have not been completed due to the driveway being a part of Phase II of the development. The improvements such as the northbound left turn lane and southbound right turn lane would be implemented as soon as the driveway is operable and serves as an access to the project site. Phase II of the development would include construction of the driveway. The through lane mentioned for the eastbound movement would be constructed as a shared left/right turn lane instead of a shared through/left/right turn lane as there is no fourth leg to the intersection (east leg). This is due to right-of-way constraints and the land east of the driveway being designated as a conservation habitat land use.

5.8.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- T-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- T-2 Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b). [Vehicle Miles Travelled]
- T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- T-4 Result in inadequate emergency access.

Intersection Capacity Analysis

For signalized intersections LOS is directly related to the average control delay per vehicle and is correlated to a LOS designation as described in Table 5.8-3, *Signalized Intersection LOS Thresholds*.

Table 5.8-3 Signalized Intersection LOS Thresholds

Description	Average Control Delay (seconds), V/C \leq 1.0	Level of Service, V/C \leq 1.0	Level of Service, V/C $>$ 1.0
Operations with very low delay occurring with favorable progression and/or short cycle length.	0 to 10.00	A	F
Operations with low delay occurring with good progression and/or short cycle lengths.	10.01 to 20.00	B	F

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Table 5.8-3 Signalized Intersection LOS Thresholds

Description	Average Control Delay (seconds), V/C ≤ 1.0	Level of Service, V/C ≤ 1.0	Level of Service, V/C > 1.0
Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.	20.01 to 35.00	C	F
Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable.	35.01 to 55.00	D	F
Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.	55.01 to 80.00	E	F
Operations with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths.	80.01 and up	F	F

Source: Urban Systems Associates, Inc. 2021

Unsignalized Intersections

The City of Wildomar and Caltrans require the operations of unsignalized intersections be evaluated using the methodology described in the HCM (6th Edition). The LOS rating is based on the weighted average control delay expressed in seconds per vehicle, as shown in Table 5.8-4, *Unsignalized Intersection LOS Thresholds*.

Table 5.8-4 Unsignalized Intersection LOS Thresholds

Description	Average Control Delay per Vehicle (seconds)	Level of Service, V/C ≤ 1.0	Level of Service, V/C > 1.0
Little or no delays	0 to 10.00	A	F
Short traffic delays	10.01 to 15.00	B	F
Average traffic delays	15.01 to 25.00	C	F
Long traffic delays	25.01 to 35.00	D	F
Very long traffic delays	35.01 to 50.00	E	F
Extreme traffic delays with intersection capacity exceeded	> 50.00	F	F

Source: Urban Systems Associates, Inc. 2021

At two-way or side-street stop-controlled intersections, LOS is calculated for each controlled movement and for the left turn movement from the major street, as well as for the intersection as a whole. For approaches composed of a single lane, the delay is computed as the average of all movements in that lane.

City of Wildomar Thresholds of Significance

To determine if the addition of project generated traffic will result in an infrastructure deficiency to any of the studied intersections, the City uses the following thresholds:

- An infrastructure deficiency occurs to a studied intersection when the addition of project generated traffic causes the peak hour level of service to change from an acceptable LOS D or better to a LOS E or F.

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- An infrastructure deficiency occurs to a studied intersection when the addition of project generated traffic causes the intersection to have an increase in delay of 5.0 seconds or more and the intersection is operating at a LOS E or F in the “without project” conditions.

A project is fully responsible for improvements if project traffic degrades the LOS of an intersection from an acceptable LOS to a LOS E or F. Should this occur, the project is responsible for contributing a fair share percentage towards an improvement of the intersection to bring the LOS back to below the level of significance.

VMT Threshold

On June 10, 2020, the City of Wildomar adopted a VMT threshold of three percent below Citywide average VMT as calculated by WRCOG. The Citywide Average is 32.87 VMT per service population. Therefore, any project that generates 31.88 VMT or more per service population would be considered to have a significant impact.

5.8.3 Applicable Mitigation Measures from the 2007 EIR (Original Project)

None of the Mitigation Measures from the Original Project would be applicable. However, as Driveway #4 has not been constructed yet (as it was determined to be part of Phase II), the following Project Design Features would be applicable:

- PDF 5.12-3: The project applicant shall construct a minimum 150-foot northbound left-turn lane at the intersection of Inland Valley Drive and Driveway 4.
- PDF 5.12-6: The applicant shall construct a 275-foot southbound right-turn lane at the intersection of Inland Valley Drive and Driveway 4.

5.8.4 The 2007 Approved Project (Original Project)

The Original Project was determined to result in a substantial increase in traffic in relation to the existing traffic load and capacity of the street system. The Original Project stated that access to the site would be from Clinton Keith, Oak Springs Road, and Inland Valley Drive.

The Original Project determined that the combined (single-family and apartment-related trips) project would generate a total of 3,289 average daily trips, which equates to 252 trips during the AM peak hour and 318 trips during the PM peak hour for the build-out conditions of the Original Project. Without improvements, the Original Project was determined to exceed the LOS C set by the County for designated roads and highways.

The Original Project determined that the addition of traffic signals at the unsignalized intersections (Frontage Road-Hidden Springs Road at Clinton Keith Road, George Avenue-Oak Springs Road at Clinton Keith Road, Nutmeg Street at Jackson Avenue) and additional lane improvements at the I-15 northbound ramps at Clinton Keith Road bring the intersections to acceptable levels of service. A detailed progression analysis was performed for the following intersections along the I-15 Interchange:

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- Frontage Road – Hidden Springs Road at Clinton Keith Road
- I-15 Northbound Ramps at Clinton Keith Road
- I-15 Southbound Ramps at Clinton Keith Road
- Arya Drive at Clinton Keith Road
- George Avenue-Oak Springs Road at Clinton Keith Road

The progression analysis suggested the need for additional infrastructure improvements beyond existing conditions. One of these improvements consisted of an additional westbound right-turn lane at the intersection of the I-15 northbound ramps at Clinton Keith Road. This lane has recently been completed. The Original Project determined that the applicant would also be required to add an additional westbound lane along the project site frontage, but this lane would be accommodated within the existing right-of-way and would not result in any offsite impacts. For existing plus ambient cumulative project traffic conditions, including the project and with mitigation, study area intersections were projected to operate at acceptable levels of service during peak hours with improvements.

For existing plus ambient plus project plus cumulative development traffic conditions, the following study area intersections were projected to operate at unacceptable levels of service during peak hours, without improvements:

- Frontage Road-Hidden Springs Road at Clinton Keith Road
- I-15 Northbound Ramps at Clinton Keith Road
- I-15 Southbound Ramps at Clinton Keith Road
- Arya Drive at Clinton Keith Road
- George Avenue-Oak Springs Road at Clinton Keith Road
- Inland Valley Drive at Clinton Keith Road
- Nutmeg Street at Clinton Keith Road

With improvements, these intersections were anticipated to operate at acceptable levels of service. A progression analysis was conducted for the following intersections:

- Frontage Road-Hidden Springs Road at Clinton Keith Road
- I-15 Northbound Ramps at Clinton Keith Road
- I-15 Southbound Ramps at Clinton Keith Road
- Arya Drive at Clinton Keith Road
- George Avenue-Oak Springs Road at Clinton Keith Road

Most movements provided adequate vehicle “stacking room” to satisfy average demand with improvements. The exceptions are:

- I-15 Southbound Ramps at Clinton Keith Road
 - Southbound Right-Turn Lane
 - Eastbound Through-Lane
 - Westbound Left-Turn Lane
- I-15 Northbound Ramps at Clinton Keith Road

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- Westbound Through-Lane
- George Avenue at Clinton Keith Road
 - Westbound Left-Turn Lane

With the implementation of Mitigation Measures 5.12-1 through 5.12-7, impacts to these roadways would be less than significant. However, the 2007 EIR determined that impacts to roadways would be significant and unavoidable as the implementation of these mitigation measures require cooperation and funding from other agencies, which cannot be guaranteed.

The 2007 EIR stated that nonvehicular circulation in the project vicinity would be provided by the installation of an 8- to 10-foot-wide community trail along Inland Valley Drive from Clinton Keith Road, which would connect to a 12-foot-wide regional community trail along the southern boundary of the project site, adjacent to the Inland Valley Medical Center. The 2007 EIR also required the installation of bicycle racks at the clubhouse as well as the provision of a bus turnout on Clinton Keith Road near the intersection with Oak Springs Road.

The 2007 EIR determined that emergency access to the project site would be provided by the four driveways which include the main entry from Clinton Keith Road (Driveway 3), the access road from Inland Valley Drive (Driveway 4), and the two access roads from Oak Springs Road (Driveways 1 and 2); Driveway 1 on Oak Springs Road was stated to be for vehicle egress only. The 2007 EIR stated that access from Inland Valley Drive would provide access to both the multifamily and single-family dwelling unit areas of the development, and in the single-family planning area, the access road from Inland Valley Drive would connect to an interior loop road, designed to accommodate emergency vehicle access. The 2007 EIR determined that the multifamily portion of the Original Project would be accessed via two other roadway entrances, with additional advantage of a third egress-only point on Oak Springs Road. The Initial Study prepared for the Original Project determined that impacts as a result of an increase in hazards to a design feature or incompatible use would be less than significant.

5.8.5 Environmental Impacts of the Modified Project

5.8.5.1 METHODOLOGY

The Traffic Impact Analysis (see Appendix 5.8-1) evaluated the Modified Project in five scenarios: Projected Future Traffic and Modified Project, Existing Plus Project Plus Ambient Growth Conditions, Existing Plus Ambient Growth Plus Cumulative Project Conditions (Near Term Year 2023), Existing Plus Project Ambient Growth Plus Cumulative Project Conditions (Near Term Plus Project Year 2023), and Cumulative Traffic. The effectiveness of the mitigation measures adopted in the 2007 EIR for the Original Project were evaluated to determine if they remained adequate, or if changes to the mitigation measure(s) were needed.

Project Trip Generation

Trip generation represents the amount of traffic which is both attracted to and produced by a development. As shown in Table 5.8-5, *Project Trip Generation Summary*, the Modified Project would generate 2,108 average

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daily trips whereas the single-family residences proposed under the Original Project would generate 972 average daily trips. Therefore, the Modified Project would result in an increase of 1,136 average daily trips.

Table 5.8-5 Project Trip Generation Summary

Project Trip Generation											
Land Use	Intensity	Rates ¹	ADT	AM				PM			
				Peak Rate	Vol.	In	Out	Peak Rate	Vol.	In	Out
Existing Entitlement											
Single-Family Residential (LU 210)	103 DU	9.44/DU	972	0.74/DU	76	19	57	0.99/DU	102	64	38
Proposed Land Uses											
Multi-Family Residential (LU 220)	288 DU	7.32/DU	2,108	0.46/DU	132	30	102	0.56/DU	161	102	60
Net Total	392		1,136		56	11	45		59	37	22

Source: Urban Systems Associates, Inc. 2021

¹Rates are used from ITE Trip Generation Manual 10th Edition

Note:

ADT = Average Daily Trips

DU = Dwelling Unit

Project Trip Distribution

According to the TIA, most of the project traffic is expected to use the I-15 northbound and southbound ramps. The TIA states that 100 percent of project traffic would travel onto Inland Valley Drive due to the project access being connected to this street, 20 percent of project traffic is expected to go south onto Prielipp Road, 80 percent towards Clinton Keith Road, and 15 percent of project traffic will travel east from Inland Valley Drive, 65 percent will travel towards the I-15, and 30 percent of project traffic will travel onto the northbound and southbound ramps.

Level of Service

The applicable minimum LOS utilized for the purposes of this analysis is LOS D per the City's General Plan.

Facility Improvements

The Modified Project would provide the following extraordinary benefit facility improvements as project design features:

- The Modified Project will provide an improvement on the western leg of the intersection of Clinton Keith Road at Inland Valley Drive to remove 3 feet of the raised median to allow large semi-trucks coming from Inland Valley Drive to complete a left turn onto Clinton Keith Road without hitting the existing raised median.
- The Modified Project will also provide a fee to improve Inland Valley Drive to its ultimate classification as a 4 lane “secondary highway” for the segment that falls within the project’s study area.

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- The Modified Project will provide Intelligent Transportation Systems (ITS) technology syncing improvements to the signalized intersections of Clinton Keith Road/Arya Road, Clinton Keith Road/Wildomar Trail, and Clinton Keith Road/Inland Valley Drive. The improvements include installing 360-degree all-in-one camera system that is capable of connecting to the signal controller and automatic signal timing plan generator, which would be cloud based. Such improvements will allow for signal timing and coordination.

Impact 5.8-1: Would the Modified Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? [Threshold T-1]

The Original Project determined that impacts would be significant and unavoidable, even after the implementation of mitigation measures, as funding and coordination with other agencies could not be guaranteed. Based on the TIA prepared for the Modified Project (Appendix 5.8-1), no infrastructure deficiencies would occur to any of the studied intersections despite the addition of project traffic. This is due to the change in delay threshold being less than 5.0 seconds for intersections that are operating at a LOS E or worse. There are also no intersections that degrades from an acceptable LOS D or better to a LOS E or F. Therefore, no improvements would be required, and no conflicts related to LOS would occur.

The Modified Project would have a net trip generation increase from the previous existing entitlement of 1,136 ADT with 56 AM (11 in/45 out) peak hour trips and 59 PM (37 in/22 out) peak hour trips. Although no deficiencies were identified due to the addition of project traffic, as with the Original Project, the Modified Project would contribute its fair share fees in the funding of offsite improvements as required where applicable by the following programs such as the TUMF, DIF, and RBBB. As indicated above, the Original Project implemented all the intersection improvements shown in Table 5.8-2, except for Driveway #4 at Inland Valley Drive. The Modified Project would include the following improvements at Driveway #4 as extraordinary benefits:

- Removal of 3 feet of raised median on western leg of Clinton Keith Road/Inland Valley Drive intersection to allow ease of left turns for trucks.
- Intelligent Transportation Systems (ITS) technology syncing improvements to signalized intersections of:
 - Clinton Keith Road/Arya Road
 - Clinton Keith Road/Wildomar Trail
 - Clinton Keith Road/Inland Valley Drive
- Construct a northbound left turn into the project driveway on Inland Valley Drive
- Construct a southbound right turn lane into the project driveway on Inland Valley Drive

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Public Transit and Bicycle Plans

The Riverside Transit Agency (RTA) Bus Route 23, Clinton Keith-Wildomar Trail stop operates along Clinton Keith Road and is approximately 0.2-mile northwest of the site, and Bus Route 23, Inland Valley Dr, operates along Inland Valley Drive and is approximately 520 feet southeast of the site. Additionally, there is a regional trail, Jon Rodarme Trail, which is approximately 1-mile long, to the south of the Specific Plan Area (Wildomar 2019). The Modified Project would create an extension of the community trail system around the perimeter that connects to the Oak Springs Phase 1 perimeter trail to the north and the Jon Rodarme Trail along Inland Valley Road. The Modified Project would be checked for compliance with standards of applicable plans as part of the City's site plan review process. Therefore, the Modified Project would not conflict with any policies, plans, or programs related to public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities as improvements would occur within the project boundaries. Impacts would be less than significant.

The Original Project was determined to result in less than significant impacts to plans, policies, and programs regarding public transit, bicycle, or pedestrian facilities. The Original Project stated that nonvehicular circulation in the project vicinity would be provided by a new 8- to 10-foot wide community trail along Inland Valley Drive from Clinton Keith Road, which would connect to a 12-foot-wide regional community trail (Jon Rodarme Trail). The Original Project provided bicycle racks at the clubhouse as well as a bus turnout on Clinton Keith Road.

The Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects, and the Modified Project would not result in new or more significant impacts in this regard.

Level of Significance Before Mitigation: Impact 5.8-1 would less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required.

Level of Significance After Mitigation: Impact 5.8-1 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Impact 5.8-2: Would the Modified Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? [Threshold T-2]

The VMT analysis was added to the CEQA Guidelines in 2019, and therefore, VMT was not addressed in the 2007 EIR for the Original Project.

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Unlike urban areas that have many transit options, communities like Wildomar are limited in the mitigation that can apply to reduce VMT. For example, without high quality transit in the City, it is impractical to eliminate parking.¹ Lack of high-quality transit also reduces the potential for transit-oriented design (TOD).

WRCOG evaluated several mitigation strategies designed to reduce VMT for applicability in the City. Transportation planners refer to a reduction in trips as Transportation Demand Management (TDM). The Transportation Demand Management (TDM) strategies and its effectiveness for reducing VMT were reviewed and assessed for relevancy (Fehr & Peers 2019). Given the City's rural / suburban land use context, the following key strategies were identified as the most appropriate.

- diversifying land use
- improving pedestrian networks
- implementing traffic calming infrastructure
- building low-street bicycle network improvements
- encouraging telecommuting and alternative work schedules
- providing ride-share programs

The measures are intended to apply at the City level; however, project specific design elements are included in the Modified Project and would be consistent with the larger City effort to connect sidewalks and trails to encourage non-motorized transportation. Considered in its entirety, the Modified Project is high-density residential development, and it is possible that employees at the nearby industrial facilities, medical facilities or commercial retail would be residents of the Modified Project and could walk to their places of employment.

As shown in Table 5.8-6, *Estimated VMT Reduction for Wildomar with Plausible Mitigation*, the potential reduction in VMT is expressed as a range and varies depending on the source of the documentation. The CAPCOA analysis was conducted in 2010, and the WRCOG analysis in 2019. The anticipated reduction in VMT estimated by WRCOG is less than the CAPCOA projections.

Table 5.8-6 Estimated VMT Reduction for Wildomar With Plausible Mitigation

Measure	CAPCOA		WRCOG	
	Low	High	Low	High
Mixed Use ¹	9.00%	30.00%	-	12.00%
Pedestrian Network ²	-	2.00%	0.50%	5.70%
Traffic Calming	0.25%	1.00%	-	1.70%
Car Sharing	0.40%	0.70%	0.30%	1.60%
Transit System	0.02%	2.50%	0.30%	6.30%
Total	9.67%	36.20%	5.60%	27.30%
Average	1.93%	7.24%	1.12%	5.86%

¹ Section 21064.3(b) of the Public Resource Code defines high-quality transit areas as: The intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Riverside Transit Authority stops 8 and 23 do not meet this definition with stops averaging over 30 minutes between stops.

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Tenant Dependent Measures				
Telecommuting	0.70%	5.50%	0.20%	4.50%
Ridesharing	1.00%	15.00%	2.50%	8.30%
Total	1.70%	20.50%	2.70%	12.80%
Average	0.85%	10.25%	1.35%	6.40%
Overall Total	11.37%	56.70%	8.30%	40.10%
Overall Average	1.62%	8.10%	1.19%	5.73%

Source: Fehr & Peers 2019
¹ Large Project Dependent
² Assumes Connectivity

In addition to physical design (high density residential), some of the measures are dependent upon the operation of the land use. For example, residents who are employees at nearby facilities could cycle to work; however, this represents a very small percentage of the total trips. The Modified Project would accommodate pedestrian traffic by creating an extension of the community trail system around the perimeter that connects to the Oak Springs Phase 1 perimeter trail to the north and the trail along Inland Valley Road to the south (Jon Rodarme Trail).

Table 5.8-7, *VMT Impact Evaluation*, is based on the CalEEMod model run for the Original Project and the Modified Project. As shown, the Modified Project's calculated VMT would be 20.67, which is below the threshold of 31.88. As shown in Table 5.8-7, the Original Project, which proposed 103 single-family units, would have also been below the VMT threshold. Compared to the Original Project's VMT, the Modified Project would be less than the Original Project's VMT. As the VMT for the Modified Project is below the City's VMT threshold, the VMT reduction measures in Table 5.8-6 would not be required.

Table 5.8-7 VMT Impact Evaluation

Threshold Option	Threshold	Project	Amount Below Threshold	Potentially Significant?
Original Project				
3 % below (Citywide Average – 32.87)	31.88	26.45	-5.43	No
Modified Project				
3 % below (Citywide Average – 32.87)	31.88	20.67	-11.21	No

Source: CalEEMod 2021

Level of Significance Before Mitigation: Impact 5.8-2 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures are required.

Level of Significance After Mitigation: Impact 5.8-2 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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Impact 5.8-3: Would the Modified Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible (e.g., farm equipment), or result in inadequate emergency access? [Threshold T-3 and T-4]

Project Access Analysis

The Modified Project's driveway, which would be located along Inland Valley Drive, was analyzed as an unsignalized one-way stop-controlled intersection for a level of service in the Existing plus Project and Near Term plus Project conditions. The analysis was conducted assuming that trips exiting the project driveway would also utilize the internal circulation road network to exit through other project driveways from previous phased sections located at Clinton Keith Road and George Avenue. It was anticipated that drivers would decide to use the other driveway if they saw that the driveway along Inland Valley Drive was busy.

For the Existing Plus Project AM and PM peak hours, an assumption of 88 percent and 100 percent, respectively, of project traffic would exit this driveway. For the Near Term Plus Project AM and PM peak hours, an assumption 81 percent, and 86 percent, respectively, of project traffic would exit this driveway.

Table 5.8-8 Project Driveway Analysis for Existing Plus Project Conditions

Number	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Project Driveway/Inland Valley Drive	One-Way Stop Control	22	C	23.1	C

Source: Urban Planning Associates, Inc. 2021

Table 5.8-9 Project Driveway Analysis for Near Term Plus Project Conditions

Number	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Project Driveway/Inland Valley Drive	One-Way Stop Control	34.6	D	32.6	D

Source: Urban Planning Associates, Inc. 2021

As shown in Table 5.8-8, *Project Driveway Analysis for Existing Plus Project Conditions*, and Table 5.8-9, *Project Driveway Analysis for Near Term Plus Project Conditions*, the project driveway would operate at an acceptable LOS D or better in both conditions for both the AM and PM peak hours. The project driveway was configured to have an eastbound left turn lane out and an eastbound right turn lane out to reduce possible queuing, additionally, Inland Valley Drive was assumed to remain a shared through-right turn lane for the southbound direction and a shared through-left for the northbound direction even though the existing entitlement report shows a northbound left turn lane entering the project site.

The lane configurations for the Inland Valley Drive at the Project Driveway were done with a northbound shared through/left lane due to right-of-way constraints from the adjacent habitat, and the lack of vehicular

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demand for the left turn lane. The driveway would operate at an acceptable LOS with minimal change with the inclusion of the northbound left turn lane.

The project driveway was also analyzed with a northbound left turn lane into the project site for comparison. With the addition of the northbound left turn lane, the level of service for the driveway were the following (shared northbound left/through lane delays shown in parenthesis below):

- Existing Plus Project AM- 22.0 LOS C, (22.0, LOS C), no change in delay
- Existing Plus Project PM- 23.0 LOS C, (23.1, LOS C), improves by 0.1 second
- Near Term Plus Project AM- 34.6 LOS D, (34.6, LOS D), no change in delay
- Near Term Plus Project PM- 32.3 LOS D, (32.6, LOS D), improves by 0.3 second

Therefore, the addition of the left turn lane would result in minimal improvements to the level of service of the driveway. Therefore, if a left turn lane could not be feasibly included due to right-of-way constraints the project driveway would still operate at an acceptable LOS.

Sight Distance Evaluation

The Modified Project would include access via Inland Valley Drive. Inland Valley Drive is a two-lane street. Considering the existing condition of the street, and the Modified Project's access along Inland Valley Drive, a line-of-sight study was conducted in accordance with the *Caltrans Highway Design Manual (HDM)* which references the *AASHTO A Policy on Geometric Design of Highways and Streets*. The study was done to determine if any obstructions were present for drivers making a left or right turn at the project driveway on Inland Valley Drive. Drivers along Inland Valley Drive are free flowing while drivers on the project driveway must stop to oncoming vehicles on Inland Valley Drive.

A stopping distance of 430 feet was used as the 85th percentile speed of Inland Valley Drive being 50 mph for both the northbound and southbound directions. The TIA stated that the sight distance for the proposed driveway is adequate with no obstructions present.

The City of Wildomar implements development standards designed to ensure standard engineering practices are used for all improvements. The Modified Project would be checked for compliance with these standards as part of the City's review process. Additionally, access to the project site would be reviewed by the City and the CAL FIRE / Riverside County Fire Department to ensure there is sufficient emergency access provided at the site as required by the City of Wildomar Municipal Code 8.28, Fire Code, for compliance with the California Fire Code. Therefore, impacts are less than significant.

The Original Project determined that it would not substantially increase hazards to a design feature or incompatible use; the Initial Study for the Original Project determined impacts would be less than significant. The Original Project determined emergency access to the project site would be provided by the four driveways which include the main entry from Clinton Keith Road (Driveway 3), the access road from Inland Valley Drive (Driveway 4), and the two access roads from Oak Springs Road (Driveways 1 and 2). The Original Project determined all internal roads would conform to the County's minimum roadway width to allow for emergency

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vehicle access. The Modified Project would not result in new significant environmental effects or a substantial increase in the severity of the previously identified significant effects.

Level of Significance Before Mitigation: Impact 5.8-3 would be less than significant.

Additional Mitigation Measures for the Modified Project

No additional mitigation measures required.

Level of Significance After Mitigation: Impact 5.8-3 would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

5.8.6 Cumulative Impacts

To determine cumulative traffic volumes, the City of Wildomar's approved and pending projects were added to the analysis for the cumulative traffic scenarios (Near Term Year 2023, expected project opening year). Table 4-1 shows the cumulative projects list.

The ambient growth factor of 2 percent per year was also added to the cumulative project volumes. The Modified Project is expected to be built out by 2023, so a total of 6 percent growth of the existing volumes would be applied.

Based on the TIA (Appendix 5.8-1), no infrastructure deficiencies would occur to any of the studied intersections despite the addition of project traffic. This is due to the change in delay threshold being less than 5.0 seconds for intersections that are operating at a LOS E or worse. There are also no intersections that degrades from an acceptable LOS D or better to a LOS E or F. Therefore, no improvements would be required at this time, and no conflicts to LOS would occur. In addition, the VMT generated by the Modified Project would not combine with other projects to result in a cumulative impact related to VMT.

5.8.7 Level of Significance Before Additional Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, all the impacts would be less than significant.

5.8.8 Mitigation Measures for the Modified Project

The Modified Project would not require new mitigation measure.

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5.8.9 References

California Air Pollution Control Officers Association. (CAPCOA). 2010, August. Quantifying Greenhouse Gas Mitigation Measures.

Fehr and Peers. 2019, February 26. Technical Memorandum – SB 743 Implementation of TDM Strategy Assessment.

Wildomar, City of. 2019. Multi-Use Adopt a Trail Map.

http://www.cityofwildomar.org/UserFiles/Servers/Server_9894739/File/Community/Parks%20&%20Trails/Trail%20Maps/28672a_d7d04c138a1da86b5e6313cf9a1fe471.pdf

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6. Unavoidable Impacts, Irreversible Changes, and Growth-Inducing Impacts

Significant Unavoidable and Adverse Impacts

At the end of Chapter 1, *Executive Summary*, is a table that summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. The 2007 EIR identified the following impacts as significant and unavoidable for the Original Project (numbering is from the 2007 EIR). No new significant and unavoidable impacts were identified for the Modified Project. The Modified Project would not result in any new or substantially more severe significant impacts. In fact, with mitigation, all of the impacts below would be reduced to a less than significant level.

Air Quality

- **Impact 5.2-2:** Implementation of the Oak Springs Ranch Specific Plan would violate air quality standards and contribute substantially to an existing or projected air quality violation.
- **Impact 5.2-3:** The Oak Springs Ranch Specific Plan project would result in a cumulatively considerable net increase of criteria pollutants for which the SoCAB is in nonattainment.
- **Impact 5.2-4:** Construction of the Oak Springs Ranch Specific Plan would expose sensitive receptors project to substantial concentrations of PM₁₀ during grading operations.
- **Impact 5.2-6:** The Oak Springs Ranch Specific Plan project would expose sensitive receptors within 500 feet of Interstate 15 to substantial pollutant concentrations.

Noise

- **Impact 5.9-1:** The project would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Traffic and Circulation

- **Impact 5.12-1:** The proposed project would cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system exceeding, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.

6. Unavoidable Impacts, Irreversible Changes, and Growth-Inducing Impacts

Significant Irreversible Changes Due to the Proposed Project

Section 15126.2(c) of the CEQA Guidelines requires that an Environmental Impact Report (EIR) describe any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. Specifically, the CEQA Guidelines state:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highways improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The following are the significant irreversible changes that would be caused by the proposed project, should it be implemented:

- Implementation of the proposed project would include construction activities that would entail the commitment of nonrenewable and/or slowly renewable energy resources; human resources; and natural resources such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metals, water, and fossil fuels. Operation of the proposed project would require the use of natural gas and electricity, petroleum-based fuels, fossil fuels, and water. The commitment of resources required for the construction and operation of the proposed project would limit the availability of such resources for future generations or for other uses during the life of the project.
- As increased commitment of social services and public maintenance services (e.g., police, fire, schools, libraries, and sewer and water services) would also be required. The energy and social services commitments would be long-term obligations in view of the low likelihood of returning the land to its original condition once it has been developed.
- An increase in vehicle trips would accompany project-related population growth. Over the long term, emissions associated with such vehicle trips would continue to contribute to the South Coast Air Basin's nonattainment designation for ozone (O_3) and particulate matter ($PM_{2.5}$ and PM_{10}) under the California and National Ambient Air Quality Standards (AAQS), and nonattainment for nitrogen dioxide (NO_2) under the California AAQS.
- The visual character of the project site would be altered by the construction of the new structures onsite. Landscaping, grading, and construction of the project site would also contribute to an altered visual character of the existing site. This would result in a permanent change in the character of the project site and on- and off-site views in the project's vicinity.

Given the low likelihood that the land at the project site would revert to its original form, the proposed project would generally commit future generations to these environmental changes.

6. Unavoidable Impacts, Irreversible Changes, and Growth-Inducing Impacts

Growth-Inducing Impacts of the Proposed Project

Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, this section is provided to examine ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also required is an assessment of other projects that would foster other activities which could affect the environment, individually or cumulatively. To address this issue, potential growth-inducing effects will be examined through analysis of the following questions:

- Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would this project result in the need to expand one or more public services to maintain desired levels of service?
- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Please note that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which this project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this EIR.

Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?

The proposed project would connect to existing infrastructure in the project area. The Modified Project would require approval of a General Plan Amendment to change the designation from Medium High Density Residential (MHDR) to Highest High Density Residential (HHDR) and a Specific Plan Amendment to change the designation of the site from Oak Springs Ranch SP PA2 Detached Residential to Oak Springs Ranch SP PA2 Multifamily Residential to construct 288 multifamily dwelling units on the project site. The project does not propose changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, or fire codes) to implement this project. The Modified Project would comply with all applicable City plans, policies, ordinances, etc. to ensure that there are no conflicts with adopted land development regulations and that any environmental impacts are minimized. Therefore, the Modified Project, in and of itself, would not be a precedent-setting action. As stated in this DSEIR, the Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects.

6. Unavoidable Impacts, Irreversible Changes, and Growth-Inducing Impacts

Would this project result in the need to expand one or more public services to maintain desired levels of service?

The Modified Project is expected to increase demand for fire protection services, police services, school services, and library services. However, as discussed in Section 8.12, *Public Services*, and 8.15, *Utilities and Service Systems*, of this DSEIR, existing programs and policies would ensure that the service capability will grow proportionate to the increase in uses, and impacts to public services and utilities would be less than significant. Additionally, as stated in this DSEIR, the Modified Project would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects.

Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?

During project construction, a number of design, engineering, and construction jobs would be created. Construction employees would be absorbed from the regional labor force, and the construction of the project would not attract a substantial number of new workers to the region. The operation of the proposed project would result in 953 residents (see Section 5.6, *Population and Housing*). Residents of the Modified Project would seek shopping, entertainment, employment, home improvement, auto maintenance, and other economic opportunities in the City of Wildomar and surrounding area. While this would create an increased demand for such economic goods and service, as discussed in Section 5.4, *Land Use*, the Modified Project is consistent with the growth projections in SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. Therefore, although the Modified Project would have a growth-inducing effect, growth in the region has already been assumed to occur. As stated in this DSEIR, the Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects.

Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

The Modified Project is consistent with the General Plan and zoning district and does not propose changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, or fire codes) to implement this Project. The Project would comply with all applicable City plans, policies, and ordinances to ensure that there are no conflicts with adopted land development regulations and that any environmental impacts are minimized. Therefore, the Modified Project would not be a precedent-setting action. As stated in this DSEIR, the Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project's previously identified significant effects.

6. Unavoidable Impacts, Irreversible Changes, and Growth-Inducing Impacts

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7. Alternatives to the Modified Project

7.1 INTRODUCTION

7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the Modified Project.

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (15126.6[b])
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (15126.6[e][1])
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (15126.6[e][2])
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (15126.6[f])
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries..., and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).

7. Alternatives to the Modified Project

- “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (15126.6[f][2][A])
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (15126.6[f][3])

For each development alternative, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative compared to the Modified Project.
- Identifies the impacts of the project that would be avoided or lessened by the alternative.
- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates the comparative merits of the alternative and the project.

According to Section 15126.6(d) of the CEQA Guidelines, “[i]f an alternative would cause...significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

7.1.2 Significant and Unavoidable Impacts

The 2007 EIR identified the following impacts as significant and unavoidable (numbering is from the 2007 EIR). The Modified Project would not result in any new or substantially more severe significant impacts. In fact, with mitigation, all of the impacts below would be reduced to a less than significant level.

Air Quality

- **Impact 5.2-2:** Implementation of the Oak Springs Ranch Specific Plan would violate air quality standards and contribute substantially to an existing or projected air quality violation.
- **Impact 5.2-3:** The Oak Springs Ranch Specific Plan project would result in a cumulatively considerable net increase of criteria pollutants for which the SoCAB is in nonattainment.
- **Impact 5.2-4:** Construction of the Oak Springs Ranch Specific Plan would expose sensitive receptors project to substantial concentrations of PM₁₀ during grading operations.
- **Impact 5.2-6:** The Oak Springs Ranch Specific Plan project would expose sensitive receptors within 500 feet of Interstate 15 to substantial pollutant concentrations.

Noise

- **Impact 5.9-1:** The project would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

7. Alternatives to the Modified Project

Traffic and Circulation

- **Impact 5.12-1:** The proposed project would cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system exceeding, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.

7.1.3 Project Objectives

As described in Section 3.2, the following objectives have been established for the Modified Project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

1. Create land uses that are compatible with and contribute to the surrounding community.
2. Increase the City's multi-family housing stock.
3. Create a high-quality development that enhances the project site and provides indoor and outdoor amenities for existing and future residents of the Oak Springs Ranch Specific Plan.
4. Incorporate architectural design elements that reflect the Contemporary Craftsman Architectural Style per the City's Commercial Design Guidelines.
5. Create a development that is financially feasible and that will contribute to the City's economic base without negatively affecting existing City resources.

7.2 ALTERNATIVES CONSIDERED AND REJECTED FOR FURTHER ANALYSIS

7.2.1 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines § 15126[5][B][1]). Key factors in evaluating the feasibility of potential offsite locations for EIR project alternatives include:

- If it is in the same jurisdiction.
- Whether development as proposed would require a General Plan Amendment.
- Whether the project applicant could reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). (CEQA Guidelines Section 15126.6[f][1]).

7. Alternatives to the Modified Project

The project applicant does not own or control other comparably sized property located within the City. Because impacts of the Modified Project are related to the project's development intensity, any development of the size and type proposed by the project would have the same impacts on air quality, greenhouse gases, and transportation. Therefore, that development on an alternative project site would not reduce significant impacts of the project as proposed.

7.2.2 No Build Alternative

The No Build Alternative that was considered in the 2007 EIR assumes that development under the Modified Project would not occur, and the site would remain vacant. The No Build Alternative would not meet any of the objectives of the Modified Project and is unlikely given the location adjacent to the I-15 interchange, surrounding development, and currently approved development plans.

7.2.3 Reduced Intensity Alternative

The Original Project proposed that the project site would be developed with fewer residential units to generate less traffic and traffic-related impacts on I-15. The Original Project found that this Alternative would not substantially reduce or eliminate significant impacts of the Original Project. Similarly, a Reduced Intensity Alternative of the Modified Project would not substantially reduce or eliminate significant traffic impacts of the Modified Project as the traffic impacts of the Modified Project would be similar to the Original Project.

7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Because no new or substantially more severe impacts were identified for the Modified Project, the main changes from the Original Project and Modified Project is the proposed increase in dwelling units. As a result, the alternatives listed below are summarized from the Original Project and compared to the Modified Project.

An EIR must identify an “environmentally superior” alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the Modified Project and determined to be environmentally superior, neutral, or inferior. Section 7.4 identifies the Environmentally Superior Alternative.

7.3.1 Alternatives Comparison

7.3.1.1 NO PROJECT ALTERNATIVE

The Original Project's No Project Alternative consists of no entitlements being provided for development of the project and assumed that the Specific Plan, Tentative Tract Map and Plot Plan, and development permits were not approved or issued. Because there were no approved plans or entitlements for the site, the No Project Alternative assumed the site would remain as an undeveloped site.

- **Aesthetics:** The No Project Alternative would result in no change to the visual setting of the site and impacts were considered to be environmentally superior compared to the Original Project.

7. Alternatives to the Modified Project

- **Air Quality:** The No Project Alternative would eliminate all of the construction and occupancy activities that would generate air emissions under the Original Project. Therefore, the No Project Alternative was considered to be environmentally superior compared to the Original Project.
- **Biological Resources:** The No Project Alternative would not impact biological resources and mitigation identified in the Original EIR would not be needed. Therefore, the No Project Alternative was considered to be environmentally superior compared to the Original Project.
- **Cultural Resources:** The No Project Alternative would not result in potential impacts to archaeological resources during grading and mitigation measures would not be required. Therefore, the No Project Alternative was considered to be environmentally superior compared to the Original Project.
- **Geology and Soils:** The No Project Alternative would not require mitigation measures in the form of grading and construction techniques to reduce impacts to erosion, groundshaking, subsidence, wind erosion, and erosion of topsoil. Therefore, the No Project Alternative was considered to be environmentally superior compared to the Original Project.
- **Hazards and Hazardous Materials:** The No Project Alternative would not require mitigation measures to reduce impacts associated with accidental upset or spill of petroleum products during construction. Therefore, the No Project Alternative was considered to be environmentally superior compared to the Original Project.
- **Hydrology and Water Quality:** The Original Project was determined to result in less than significant impacts with mitigation incorporated. The No Project Alternative would not result in a change to groundwater flow and would not deplete groundwater, or impact blueline streams. Therefore, the No Project Alternative was considered to be environmentally superior compared to the Original Project.
- **Land Use and Planning:** Without any development, the No Project Alternative would have an impact on land use and planning. As the Original Project was in Riverside County at the time of approval, the County identified the site as an integral residential, commercial, and business park location in a community-center setting designed to meet the needs of the growing population. While the City incorporated since the Original Project approval, the impact remains relevant, if not developed into any of these uses, the City's General Plan and provision of housing choices would not be fulfilled. Therefore, the No Project Alternative was considered to be environmentally inferior compared to the Original Project.
- **Noise:** The Original Project was determined to have a significant noise impact due to helicopter overflights. Mitigation measures were included for noise impacts to buildings closest to the freeway and Clinton Keith Road. No construction would occur under this Alternative. Therefore, the No Project Alternative was considered to be environmentally superior compared to the Original Project.
- **Public Facilities and Services:** The Original Project was determined to result in less than significant impacts with mitigation incorporated. However, indirectly, as a result of the project site not being developed, the County's assumptions regarding development impact fees and other fees to meet

7. Alternatives to the Modified Project

cumulative demand for public service might have to be recalculated because of insufficient funds to meet this cumulative demand. Therefore, the No Project Alternative was considered to be environmentally inferior compared to the Original Project.

- **Recreation:** The No Project Alternative would result in no change to the recreation impacts of the site; one benefit of the Original Project is the community trail connection it proposed. Therefore, the No Project Alternative was considered to be environmentally inferior compared to the Original Project.
- **Transportation:** The Original Project would result in significant adverse impacts to the circulation system. The No Project Alternative would eliminate the Original Project's contributions to cumulative traffic growth. Therefore, the No Project Alternative was considered to be environmentally superior compared to the Original Project.

The project site has been graded, and Phase 1 of the Specific Plan Area has already been developed. The Original Project was approved, and therefore, development of 103 single-family homes was approved for the project site. If the No Project Alternative were applied to the Modified Project, no development would take place on the project site and the effects would be the same as identified above. If no action were taken and the site is developed as approved, the impacts would be the same as those disclosed in the 2007 EIR for the Original Project.

7.3.1.2 NO PROJECT/EXISTING GENERAL PLAN LAND USES ALTERNATIVE

The 2007 EIR analyzed a No Project/Existing General Plan Land Uses Alternative that assumed the site would be developed with Light Industrial uses (industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities and supporting retail uses) in the southern portion and with uses consistent with the Community Center designation (retail commercial, office and business park uses, high density residential uses, civic uses, transit facilities, and recreational open space) in the north. However, the Light Industrial use designation lies mostly in the riparian area which would either prevent development of Light Industrial if this area were to be preserved, or would result in destruction of an open space resource with a blue line stream and a number of oak trees.

As the Original Project was approved, the existing General Plan designation for the site is Medium High Density Residential (MHDR). Therefore, if this Alternative were to be implemented and the Modified Project was not developed, a General Plan and Specific Plan Amendment would be required to allow for the commercial and industrial uses. Because Phase 1 of the Original Project has already been developed, development of the remainder of the site with commercial and industrial uses would result in land use incompatibilities and this alternative would be infeasible. Therefore, impacts under this Alternative, when compared to the Modified Project, would be environmentally inferior.

7.3.1.3 LOWER DENSITY RESIDENTIAL ALTERNATIVE

Under the Lower Density Residential Alternative, the density of the single-family portion of the Original Project would be reduced. One of the County's objectives for the site is to provide additional types of housing choices to this area within easy access to major transportation corridors. This Alternative included:

7. Alternatives to the Modified Project

- Approximately 14 acres of open space
- Approximately 36 acres developed as single-family and multifamily homes at an average of 9.5 units per acre, for a total of 312 multifamily dwelling units at 14.9 du/ac and 51 single-family dwelling units on 5,400-square-foot lots with an average density of 4 du/ac
- A total population of 862 persons.

This Alternative would provide up to 363 dwelling units which might meet some housing needs for these residences. However, in general it would not meet the existing need for housing in the area and therefore would not meet all the objectives of the Original Project (312 multifamily dwelling units and 103 single-family units with associated recreational areas). When the lot sizes are increased for single-family residential uses, there would not be as much land for community recreational areas. Additionally, it would not provide the highest and best use for the area as envisioned in the General Plan—which provides for high and very high-density residential uses next to transportation corridors—and would therefore not be as compatible with the General Plan.

- **Aesthetics:** The Lower Density Alternative could have greater aesthetic impacts than the Original Project because this Alternative would most likely have garage doors fronting on all the streets, resulting in less attractive views into and throughout the project site. Therefore, the Lower Density Alternative was considered to be environmentally inferior compared to the Original Project.
- **Air Quality:** The Lower Density Alternative would result in a reduction in traffic directly related to the Original Project and also lower energy usage. These would result in a reduction in air quality impacts associated with the Lower Density Alternative. Therefore, the Lower Density Alternative was considered to be environmentally superior compared to the Original Project.
- **Biological Resources:** The Lower Density Alternative would be required to avoid the riparian area to the maximum extent feasible and also would provide a community trail connection. Because of the reduction in units, this Alternative would result in a reduced impact to biological resources. Therefore, the Lower Density Alternative was considered to be environmentally superior compared to the Original Project.
- **Cultural resources:** The Lower Density Alternative would result in the same amount of disturbance to the site and the same impact to cultural resources as the Original Project. Therefore, the Lower Density Alternative was considered to be environmentally neutral compared to the Original Project.
- **Geology and Soils:** The Lower Density Alternative has the same potential for potentially significant impacts to erosion, groundshaking, subsidence, wind erosion, and erosion of topsoils, as the Original Project. As this Alternative provides fewer dwelling units, fewer people would be exposed to any geophysical impacts than would occur with the Original Project. Therefore, the Lower Density Alternative was considered to be environmentally superior compared to the Original Project.
- **Hazards and Hazardous Materials:** The Lower Density Alternative would result in the same type of exposure to hazards as the Original Project. However, as there would be fewer dwelling units, fewer

7. Alternatives to the Modified Project

people would be exposed to the risk. Therefore, impacts would be less than under the Original Project. Therefore, the Lower Density Alternative was considered to be environmentally superior compared to the Original Project.

- **Hydrology and Water Quality:** Impacts to hydrology and water quality from the Lower Density Alternative would be the same as with the Original Project because the development footprint would be the same. However, water demand would be less with fewer dwelling units and therefore impacts would be less than the Original Project. Therefore, the Lower Density Alternative was considered to be environmentally superior compared to the Original Project.
- **Land Use and Planning:** The Lower Density Alternative would have the same general land use and planning impacts as the Original Project, and would require a General Plan Amendment and Zone Change. Fewer dwelling units onsite could result in a need for development of more housing on another site. Therefore, the Lower Density Alternative was considered to be environmentally inferior compared to the Original Project.
- **Noise:** The Lower Density Alternative would not change not change the multifamily component of the Original Project. Because there would be fewer single-family houses on the site, they could be further away from the freeway. The Lower Density Alternative would also generate slightly less traffic and operational noise. Therefore, the Lower Density Alternative was considered to be environmentally superior compared to the Original Project.
- **Public Facilities and Services:** The Lower Density Alternative would have similar impacts to the Original Project, however, impacts would be slightly less under this Alternative as fewer dwelling units would be built and impacts to police, fire, schools, water and sewer, and solid waste services would therefore be less. Therefore, the Lower Density Alternative was considered to be environmentally superior compared to the Original Project.
- **Recreation:** The Lower Density Alternative could have greater recreational impacts than the Original Project because there would be more land devoted to single-family lots versus common recreational areas to be shared by all residents. Cumulative impacts could be reduced because the Lower Density alternative would generate fewer residents likely to use off-site recreational facilities. Therefore, the Lower Density Alternative was considered to be environmentally neutral compared to the Original Project.
- **Transportation:** The Lower Density Alternative would have fewer contributions to cumulative traffic growth and impacts on the circulation system than the Original Project. However, the cumulative traffic increases may continue to cause short-term significant adverse impacts, and without the Original Project's improvements or contributions, the potential for cumulative traffic impacts may actually increase. Overall, the Lower Density Alternative could reduce the impacts on the circulation system attributable to development of the Original Project on the site, but this Alternative may nevertheless contribute to cumulative increases in traffic flow. Therefore, the Lower Density Alternative would be considered environmentally neutral with regard to traffic impacts.

7. Alternatives to the Modified Project

The Modified Project would replace the 103 single-family units originally proposed under the Original Project with 288 multifamily dwelling units. If this Alternative were applied to the Modified Project, approximately 143 multifamily dwelling units would be developed instead of 288 dwelling units. The analysis of this Alternative in comparison to the Modified Project would result in similar impacts as analyzed above, and would be considered generally superior to the Modified Project.

7.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. The Lower Density Alternative would be the environmentally superior alternative as it would reduce the physical environmental effects of the Modified Project. However, it would not increase the City’s multifamily housing stock (Objective 2), nor would it provide indoor and outdoor amenities for existing and future residents of the Oak Springs Ranch Specific Plan (Objective 3). Further, while a reduced density project would contribute to the City’s economic base (Objective 5), it would be at a lesser level than the Modified Project.

8. Impacts Found Not to Be Significant

California Public Resources Code, section 21003 (f) states: "...it is the policy of the state that...[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." This policy is reflected in the State CEQA Guidelines, section 15126.2(a), which states that "[a]n EIR [Environmental Impact Report] shall identify and focus on the significant environmental impacts of the proposed project" and section 15143, which states that "[t]he EIR shall focus on the significant effects on the environment."

State CEQA Guidelines, section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant. This chapter includes an environmental analysis and finding of no impact, less than significant impact, or less than significant with mitigation incorporated for the topics not included in Chapter 5, *Environmental Analysis*, of this Draft SEIR.

The Modified Project, as compared to the Original Project, would not result in any new significant impacts or an increase in the severity of significant impacts to the following topics: Agriculture and Forestry Resources, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Recreation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. The following sections provide the thresholds of significance and a brief analysis supporting the determination of no impact, less than significant impact, or Less Than Significant Impact with Mitigation Incorporated. Mitigation measures discussed in this SEIR for the Modified project are shown in Chapter 1.0 Executive Summary. All mitigation measures from both, as modified by this SEIR and those from the Original Project, will be part of the Mitigation Monitoring and Reporting Program (MMRP).

8. Impacts Found Not to Be Significant

8.1 AGRICULTURE AND FORESTRY RESOURCES

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

No Impact. As stated in the Original Project, according to the State Farmland and Monitoring Program (FMMP), the site is not designated as Prime, Statewide Important, Unique, or Locally Important Farmland, nor is it under a Williamson Act (agricultural preserve) contract. There are no agricultural uses within 300 feet of the property or in the surrounding area. Therefore, as with the Original Project, the Modified Project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural land uses. Therefore, no impact would occur.

The Modified Project would not result in new or substantially more severe significant impacts.

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

No Impact. There is no land zoned for Williamson Act contracts either on the project site or on adjacent properties, as stated in the Original Project. Therefore, no impacts would occur.

The Modified Project would not result in new or substantially more severe significant impacts.

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

No Impact. According to the Original Project, the project site is not designated as forestland or timberland, and there is no forestland or timberland adjacent to the project site. Therefore, no impact would occur.

The Modified Project would not result in new or substantially more severe significant impacts.

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

No Impact. There are no forestlands on the site or within the project vicinity. Therefore, as with the Original Project, no impact would occur.

The Modified Project would not result in new or substantially more severe significant impacts.

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

No Impact. The Project site does not contain forest land. Implementation of the Modified Project would not change existing land use or zoning designations and would not result in the conversion of farmland to nonagricultural use or forest land to non-forest use. As with the Original Project, no impact would occur.

8. Impacts Found Not to Be Significant

The Modified Project would not result in new or substantially more severe significant impacts.

8. Impacts Found Not to Be Significant

8.2 BIOLOGICAL RESOURCES

Would the project:

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

Less Than Significant Impact. As stated in the Original Project, the Original Project would result in the direct removal of individual and small populations of common plant species and directly impact wildlife resources through the direct removal of habitat and displacement of wildlife species. However, sensitive plants were not present and are not expected due to the absence of suitable habitat and soils on the project site. Further, the wildlife species that would be displaced are common species and are not sensitive or rare.; Therefore, as with the Original Project, impacts would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. According to the Original Project, some portions of the drainages and the riparian habitat would be impacted by project development. Grading for the Modified Project would result in impacts to MSHCP-defined riparian/riverine areas consisting of ± 0.793 acre of permanent impacts to small fringe areas of oak woodland/ riparian/rivervine habitat associated with slope construction. Development of the project would also remove 27 oak trees within the CDFG jurisdictional area.

A total of ± 2.00 acres of oak woodland/riparian habitat mitigation is proposed as part of the project design. Mitigation for permanent impacts to small fringe oak woodland habitat is proposed on-site, at an approximate 3:1 ratio, including the creation of 1.5 acres of oak woodland within the conservation area and enhancement of 0.5 acre of riparian vegetation in the northernmost portion of the western branch of the on-site drainages. Maintaining the drainages as open space, conserving oaks and planting additional oaks, would also offset impacts to local wildlife movement and migratory birds. The creation of ± 1.50 acres of oak woodland within the conservation area and enhancement of ± 0.50 acre of riparian vegetation would provide additional habitat to expand and enhance the existing corridor.

As with the Original Project, the Modified Project would remove these communities during construction. However, with the implementation of the project design features from the Original Project, impacts would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

8. Impacts Found Not to Be Significant

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

Less Than Significant Impact. As indicated in the Original Project, the project site contains approximately 0.44 acre of U.S. Army Corps of Engineers jurisdictional waters of the U.S. and approximately 6.37 acres of CDFG jurisdictional waters of the State, including jurisdictional vegetation (i.e., riparian). The acreage that would actually be impacted by grading for the project is approximately 0.098 acre of Corps jurisdictional waters of the U.S. Permanent impacts to CDFG jurisdictional waters of the State would total approximately 0.79 acre and would result in the take of 27 oak trees within the CDFG jurisdictional area.

The project is designed to minimize impacts to jurisdictional waters by impacting the most disturbed portion of Drainage A, while preserving and enhancing the majority of the riparian woodland to the south/southeast. The project proposes to install a total of 2.0 acres of riparian vegetation enhancement and oak trees within the conservation area. In addition, as required by state and federal regulations, the applicant is required to mitigate impacts to waters of the U.S. and/or waters of the state such that no net loss in extent or value of habitat results. According to the Original Project, the project is required to address minimal impacts to jurisdictional drainages resulting from development of the project, pursuant to the final Corps, CDFG, and RWQCB permits and conditions, by complying with existing regulations, standards, project-specific conditions, and project design features.

Therefore, as with the Original Project, impacts of the Modified Project would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. According to the Original Project, project implementation would result in disturbances to local wildlife movement for species with home ranges and average dispersal distances entirely contained within the project site. However, project implementation would avoid a majority of Drainage A and its associated tributaries and leave these areas as open space, which would still allow movement through the project site for species with slightly larger home ranges. Therefore, the interruption of local movement represents a less than significant impact, since the Modified Project would not interfere substantially with the movement of any native resident wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

On a regional level, the project site and surrounding areas are limited by the surrounding disturbances. Alternative travel routes for regional movement have been identified in the MSHCP Conservation Areas and provide sufficient resources necessary for movement for the larger mammals through the region. The project is not within and will not impact any of the MSHCP Cores or Proposed Linkages. Therefore, impacts to regional movement are not anticipated to be significant since the Modified Project would not interfere

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substantially with the movement of any native resident wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Migratory birds, including raptors, utilize the site for foraging and would potentially use the trees on-site to nest. Potential nesting areas include native trees associated with riparian vegetation along the drainages and nonnative trees in the landscaped areas adjacent to the site. Project construction would potentially result in impacts to migratory birds, including nesting birds, raptors that may utilize the site to forage, and roosting birds within and in the vicinity of the project site. However, potential impacts through removal or abandonment of nesting birds within the project site during project construction would be mitigated by compliance with the MBTA. Maintaining the drainages as open space, conserving oaks and planting additional oaks, would offset impacts to local wildlife movement and migratory birds.

As with the Original Project, the Modified Project would result in a less than significant impact on the implementation of project design measures and compliance with existing regulations.

The Modified Project would not result in new or substantially more severe significant impacts.

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

No Impact. The City of Wildomar does not have a local tree ordinance or any other local ordinance that pertains to the protection of biological resources. Therefore, as with the Original Project, the Modified Project would result in no impact.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. The project site is located within the Elsinore Area Plan of the MSHCP and requires compliance with the protection of species associated with riparian/riverine areas and vernal pools. However, as stated in the Original Project, the project site is not within or adjacent to a Criteria Cell, a designated Cell Group, or a subunit within the Elsinore Area Plan that requires conservation of land for inclusion in the MSHCP Conservation Area. Compliance with the Riparian/Riverine and Burrowing Owl sections of the MSHCP and the payment of the MSHCP development fee would reduce impacts of the Modified Project to less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

8. Impacts Found Not to Be Significant

8.3 CULTURAL RESOURCES

Would the project:

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

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

- i) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- ii) Is associated with the lives of persons important in our past.
- iii) Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- iv) Has yielded, or may be likely to yield, information important in prehistory or history.

The Original Project indicated that the project site contained numerous historic resource occurrences that were observed during site reconnaissance, all of which were associated with previous occupations of the now-abandoned Oak Springs Ranch, including structural remains of four houses, a barn, a workshop, two wooden corrals, a concrete building slab, two concrete stand pipes, several concrete and rock walls, and three concrete features whose function could not be ascertained. None of the observed historic resources possessed temporally sensitive characteristics or landmarks that would permit an assignment of age.

Based on cartographic evidence, the remains of the four houses are at least 50 years of age and thus represent historical resources. The barn, workshop, building pad, and unidentified concrete features were determined to have been constructed some time between 1953 and the present, and are therefore considered contemporary features. Based on the eligibility criteria for historical significance, none of the structural remains of the four houses are deemed historical resources eligible for listing on the California Register. Nothing is known about these houses except the fact they were once a part of the Oak Springs Ranch. According to the Original Project, the structural remains of these four houses are not considered significant cultural resources under CEQA. Therefore, no impacts would occur.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact with Mitigation Incorporated. According to the Original Project, no resources have been mapped on the project site or within the immediate surrounding area; however, there are 13 archaeological sites located within a one-mile radius of the project site. The project site was not included on

8. Impacts Found Not to Be Significant

a list of archaeological sites, including religious or sacred sites, identified during literature review. Grading activities associated with the site may uncover undiscovered prehistoric archaeological resources. Significant excavation would be required for development of stable building pads. Furthermore, while trash pits were not observed associated with the structural remains of the four houses, the potential to unearth historic artifacts remains. Therefore, additional unidentified archaeological remains could be present on the project site and could be potentially impacted by the project. With the implementation of the following mitigation measures, impacts of the Modified Project, as with the Original Project, would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Mitigation Measures

- **Mitigation Measure 5.4.2A:** Prior to the issuance of any grading permit, the project applicant shall provide written evidence to the County of Riverside that the applicant has retained a qualified archaeologist, who meets the Secretary of the Interior's Standards for archaeologists, to monitor construction activities in all cases that disturb the ground surface. A Registered Professional Archaeologist (RPA) should, at minimum, supervise any monitoring activities. Special care/observation should be given during excavation activities within the immediate vicinity of the four structural remains. Should any subsurface cultural resources be encountered, the archaeological monitor shall have the authority to halt grading activities until uncovered resources are evaluated and a determination of significance is made. If prehistoric resources are encountered, the Pechanga Tribe, the project applicant and the County of Riverside shall evaluate the significance of the resources and if appropriate, shall determine appropriate treatment and mitigation of the resources. If historic artifacts are recovered, any eligibility testing and/or determination of additional mitigation should be done in consultation with the Pechanga Tribe.
- **Mitigation Measure 5.4.2B:** The applicant must retain a monitor from the Pechanga Tribe. Tribal monitors from the Pechanga Band of Luiseño Indians shall be allowed to monitor all grading, excavation and ground-breaking activities, including further surveys, to be compensated by the project applicant/developer. The Pechanga Tribe monitors will have the authority to temporarily stop and redirect grading activities to evaluate the significance of any archeological resources discovered on the property, in conjunction with the project archeologist and the County of Riverside.

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

Less Than Significant Impact. There is no formal cemetery on or adjacent to the project site. A records search has failed to indicate the presence of Native American cultural resources in the immediate project area. However, the absence of specific site information does not necessarily indicate the absence of cultural resources in any project area. Because the cultural resources search attests to the immediate area's high sensitivity for cultural resources (13 records within a one-mile radius), there is potential for unidentified archaeological resources, including human remains, to be present on the project site and impacted by the Modified Project.

In the unlikely event that human remains are discovered during grading or construction activities within the project site, compliance with State law (Health and Safety Code § 7050.5) would be required. These

8. Impacts Found Not to Be Significant

requirements area imposed on any construction activity in which human remains are detected, and include the following provisions:

- There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
 - The coroner of the County in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required; and
 - If the coroner determines the remains to be Native American:
 - The coroner shall contact the Native American Heritage Commission within 24 hours;
 - The NAHC shall identify the person or persons it believes to be the most likely descended from the deceased Native American;
 - The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of which appropriate dignity the human remains and any associated grave goods as provided in Public Resources Code § 5097.98 (PRC § 5097.98); or
 - Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further and future subsurface disturbance pursuant to PRC § 5097.98(e).
 - The NAHC is unable to identify a most likely descendant.
 - The most likely descendant is identified by the NAHC, fails to make a recommendation within 48 hours of being granted access to the site; or
 - The landowner or his authorized representative reject the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

As with the Original Project, the Modified Project would comply with the California State Health and Safety Code § 7050.0 and Public Resources Code § 5097.98. Therefore, impacts would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

8. Impacts Found Not to Be Significant

8.4 GEOLOGY AND SOILS

Would the project:

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

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

Less Than Significant Impact. As indicated in Original Project, the project site is approximately 2.6 miles from the Elsinore (Wildomar) fault. The Elsinore fault is capable of a Magnitude 6.8 earthquake. Further to the south, the Elsinore-Julian segment is believed capable of a Magnitude 7.1 earthquake. The Original Project indicated that there were no active faults present on site and that no significant impacts due to fault rupture would occur. As with the Original Project, impacts of the Modified Project would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

ii) Strong seismic ground shaking?

Less Than Significant Impact. According to the Original Project, despite the lack of support for onsite faults, there is a potential for the site to be subject to relatively strong ground motions during its life. The project site is approximately 2.6 miles from the Elsinore fault which is capable of a Magnitude 6.8 earthquake. The maximum site acceleration is 0.44 g. However, as with the Original Project, compliance with the current California Building Code (CBC) requirements, would reduce impacts to less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. During intense shaking, any structures on these sediments may float, sink, or tilt as if on water. Liquefaction potential varies based on three main factors: 1) cohesionless, granular soils with relatively low densities (usually of Holocene age); 2) shallow groundwater (less than 50 feet); and 3) moderate to high seismic ground shaking. Lateral spreading refers to lateral displacement of large, surficial blocks of soil as a result of pore-pressure buildup or liquefaction in a subsurface layer.

The potential for liquefaction generally occurs during strong ground shaking within relatively cohesionless loose sediments where the groundwater is typically less than 50 feet below the surface. The project site is

8. Impacts Found Not to Be Significant

not located in an area mapped as having the potential for liquefaction. However, due to the presence of shallow groundwater and potential for strong seismic ground shaking, liquefaction potential was evaluated for the project site, which found that the majority of soils on the site are not subject to liquefaction, as they are cohesive (clays), medium-dense to dense sands, or bedrock. If liquefaction were to occur, dynamic settlement would be less than one-half inch. As with the Original Project, impacts of the Modified Project would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

iv) Landslides?

Less Than Significant Impact. Susceptibility of slopes to landslides and other slope failures depends on several factors that are usually present in combinations, including but not limited to steep slopes, condition of rock and soil materials, presence of water, formation contacts, geologic shear zones, and seismic activity.

According to the Original Project, the project is located in an area with low to locally moderate susceptibility to seismically induced landslides and rockfalls. As a result, landslides are not a substantial geologic hazard present at the Oak Springs Ranch Specific Plan site. Therefore, as with the Original Project, impacts of the Modified Project would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved, and removed from one place and transported to another. Precipitation, water, waves, and wind are all agents of erosion.

Prior to the issuance of grading permits, the Project Applicant would be required to prepare and submit detailed grading permits as each phase is developed. These plans would be prepared in conformance with applicable standards of the City of Wildomar. As the original and Modified Projects would disturb more than one acre, an NPDES permit and SWPPP would be required to address erosion and discharge impacts associated with the proposed onsite grading and construction. Compliance with stormwater regulations include minimizing storm water contact with potential pollutants by providing covers and secondary containment for construction materials, designating areas away from storm drain systems for storing equipment and materials and implementing appropriate practices on the construction site. The soils covering the site have a low erosion hazard potential and because the project would be required to obtain an NPDES Permit, and prepare a SWPPP and WQMP, erosion impacts would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

8. Impacts Found Not to Be Significant

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

Less Than Significant Impact With Mitigation Incorporated. Refer to Impacts 8.4(a)(iii) and (iv) for information on liquefaction and landslides.

As stated in the Original Project, the project site is not located within an area of potential ground subsidence. However, the geotechnical evaluation states that due to the site topography, cut/fill transitions would be needed for the proposed building pads in order to mitigate potential differential settlement. Differential settlement is not associated with regional or natural conditions on the site, but with the building pads, which can incur “differential” settlement due to the pad grading activities. The construction scenario for the Modified Project would include additional grading to provide a 5- to 10-foot-thick zone of compacted fill (subexcavation) below the slab and footings. During grading, subsidence is expected to occur. Implementation of the recommended geotechnical mitigation measures would ensure that potential ground subsidence impacts resulting from the Modified Project would not exceed an amount that could harm the proposed structures. With the implementation of the following mitigation measures, impacts of the Modified Project, as with the Original Project, would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Mitigation Measures

- **Mitigation Measure 5.5-2A:** The project shall include a 5- to 10-foot-thick zone of compacted fill below the slab and footings. This mitigation measure shall be identified in the grading plan and then verified in the field as each stage of construction occurs. Implementation of the proposed mitigation will not cause any additional area to be disturbed on the site or any additional environmental impacts, other than additional equipment excavation and compaction to achieve high densities of compacted material.
- **Mitigation Measure 5.5-2B:** The project shall remove and replace all upper fills/disturbed soils with properly compacted fills.
- **Mitigation Measure 5.5-2C:** Any vegetation shall be removed and hauled from proposed grading areas prior to the start of grading operations. Existing vegetation shall not be mixed into the soils. Any removed soils may be reutilized as compacted fill, once deleterious and oversized (greater than eight inches) materials have been removed.

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

Less Than Significant Impact. The Original Project determined that the soils onsite have a very low expansive potential. Therefore, as with the Original Project, impacts of the Modified Project would be less than significant.

8. Impacts Found Not to Be Significant

The Modified Project would not result in new or substantially more severe significant impacts.

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

No Impact. As with the Original Project, the Modified Project would be connected to existing wastewater facilities (sewer) owned and operated by the Elsinore Valley Municipal Water District, and septic tanks would not be used. Therefore, no impact would occur.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact with Mitigation Incorporated. As stated in the Original Project, the project site is underlain by younger Quaternary alluvial fan deposits and Pleistocene Pauba Formation, both of which have produced vertebrate fossils in the past. However, there are no known paleontological resources located within the project limits. Because both the younger Quaternary alluvial fan deposits and Pleistocene Pauba Formation have yielded paleontological resources in Southern California, the area is considered paleontologically sensitive. Upon implementation of the following mitigation measure, the Modified Project, as with the Original Project, would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Mitigation Measure

- **Mitigation Measure 5.4-4A:** Prior to the issuance of a grading permit, a qualified paleontologist will be retained to supervise construction monitoring. Should any paleontological resources be uncovered, the paleontologist shall have the authority to temporarily divert grading away from exposed fossils in order to professionally and efficiently recover the fossil specimens and collect associated data. If paleontological resources are uncovered, the paleontological monitor shall file a report with the Planning Department documenting any paleontological resources that are found during the course of site grading activities. If paleontological resources are recovered they should be sent to the San Bernardino County Museum for curation.

8. Impacts Found Not to Be Significant

8.5 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

Less Than Significant Impact. As with the Original Project, the Modified Project would not include the routine use, transport, or disposal of hazardous materials, and the Modified Project would be consistent with the General Plan policies regarding hazards and hazardous materials. Therefore, impacts would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact with Mitigation Incorporated. According to the Original Project, the Phase I ESA historical review determined that the project site has been used for agricultural purposes (orchard) from 1938 until as recently as 2003. While the project site is not actively being used as an orchard, the Original Project indicated that citrus production has historically utilized chlorinated herbicides and pesticides. Testing by CE Environmental on other orchard agricultural properties revealed low levels of chlorinated compounds, specifically DDT and its breakdown products, in shallow soil at concentrations below the USEPA Preliminary Remediation Goal levels (2 mg/Kg). Therefore, as with the Original Project, the Modified Project would result in less than significant impacts. During construction, there is a potential for release of petroleum products from use and storage of heavy construction equipment that could pose a hazard to the environment. A mitigation measure is included to reduce the potential for accidental release during construction. Furthermore, BMPs for construction in the SWPPP, would minimize the potential for a release to occur. As with the Original Project, with implementation of mitigation, impacts of the Modified Project would be less than significant with Mitigation Incorporated.

The Modified Project would not result in new or substantially more severe significant impacts.

Mitigation Measures

- **Mitigation Measures 5.6-1A:** Prior to commencement of grading activities, subsurface assessment in the form of trenching would be required in two areas identified as “suspected fill” near the north/central and central portions of the project site for the presence of hazardous materials. If hazardous materials are unearthed during trenching activities, hazardous materials shall be disposed of in accordance with local, state, and federal regulations.
- **Mitigation Measures 5.6-1B:** All spills or leakage of petroleum products during construction activities shall immediately be contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations regarding the cleanup and disposal of the

8. Impacts Found Not to Be Significant

contaminant released. The contaminated waste shall be collected and disposed of at an appropriately licensed disposal or treatment facility.

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

Less Than Significant Impact. According to the Original Project, no school facilities are located within two miles of the project site. The Modified Project is located within five miles of five schools. Donald Graham Elementary School, Wildomar Elementary School, and Elsinore High School are located between two and five miles northwest of the site; Jean Hayman Elementary School is located about five miles south of the site; and David A. Brown Middle School is located a little over three miles west of the site. Given the residential nature of the project, the type of hazardous materials that would be used during construction and operation would be limited, and the handling and disposal of all materials would be subject to applicable state and federal standards, ordinances, and regulations. Therefore, as with the Original Project, the Modified Project would result in less than significant impacts.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. According to the Original Project, the project area is not listed on any of the searched regulatory databases provided by Environmental Data Resources (EDR). Since neither the project site nor areas in the vicinity of the project site are listed as hazardous materials sites, as defined by Government Code Section 65962.5, there would be a less than significant impact.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. The nearest airport to the project site is the Skylark Field Airport in Lake Elsinore approximately 3.8 miles northwest of the site; however, as stated in the Original Project, the project site is not within the Skylark Airport Influence Policy Area. The project is consistent with the City's goals and policies related to airport land use compatibility plans. Therefore, impacts of the Modified Project, as with the Original Project, would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. As with the Original Project, the Modified Project would be designed, constructed, and maintained in accordance with applicable standards associated with vehicular access, ensuring

8. Impacts Found Not to Be Significant

that adequate emergency access and evacuation would be provided. Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/around any required roads closures. Compliance with existing regulations for emergency access and evacuation would ensure that impacts related to this issue are less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. According to the Original Project, the areas around the project site are prone to very high, high, and moderate fire risks. However, the project site is in an urbanized area that, according to the City of Wildomar General Plan, does not have any risk of wildfires. The project would be consistent with the General Plan Safety Element. Therefore, the Modified Project, as with the Original Project, would result in less than significant impacts.

The Modified Project would not result in new or substantially more severe significant impacts.

8. Impacts Found Not to Be Significant

8.6 HYDROLOGY AND WATER QUALITY

Would the project:

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

Less Than Significant Impact. The Original Project determined that the Original Project would not violate any water quality standards or waste discharge requirements, as the stormwater runoff generated from the site would be managed in accordance with regulations under the National Pollutant Discharge Elimination System (NPDES) of the Clean Water Act, Section 402; the State of California NPDES General Permit for Construction Activities adopted by the San Diego Regional Water Quality Control Board (SDRWQCB) under the Water Quality General Permit for Construction Activities; the County of Riverside NPDES Municipal Separate Storm Sewer System (MS4) Permit; and the associated Stormwater Management Plan. The Original Project was determined to result in impacts to two intermittent drainages, and therefore, the Modified Project was determined to require application and issuance of a California Department of Fish and Wildlife Service Streambed Alteration Agreement, a Section 404 Permit from the Army Corps of Engineers, and a Section 401 Water Quality Certification from the SDRWQCB.

Construction

As part of Section 402 of the Clean Water Act, the US Environmental Protection Agency has established regulations under the NPDES program to control direct stormwater discharges. The NPDES program regulates industrial pollutant discharges, which include construction activities. In California, the State Water Resources Control Board (SWRCB) administers the NPDES program and is responsible for developing NPDES permitting requirements.

Wildomar Municipal Code Section 13.12.050 requires development to comply with a MS4 Permit from the SDRWQCB. Section F1 of the MS4 permit specifies requirements for new developments, and Section F1.D details the requirements for standard stormwater mitigation plans (also known as water quality management plans). The MS4 permit imposes pollution prevention requirements on planned developments, construction sites, commercial and industrial businesses, municipal facilities and activities, and residential activities. Even though Wildomar is split by two watersheds (Santa Ana and Santa Margarita) that affect some of the properties in the City, the entire City is governed by the MS4 Permit for the Santa Margarita Region.

Requirements for waste discharges potentially affecting stormwater from construction sites of one acre or more are set forth in the SWRCB's Construction General Permit, Order No. 2012-0006-DWQ, issued in 2012. The project site is larger than one acre and would be subject to requirements of the Construction General Permit. Projects obtain coverage under the Construction General Permit by filing a Notice of Intent with the SWRCB prior to grading activities, and preparing and implementing a Stormwater Pollution Prevention Plan (SWPPP) during construction. The primary objective of the SWPPP is to identify, construct, implement, and maintain best management practices (BMPs) to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the project site, and to contain hazardous materials. BMPs categories include, but are not limited to, erosion control and wind erosion control, sediment control, and tracking control.

8. Impacts Found Not to Be Significant

Implementation and monitoring required under the SWPPP would control and reduce short-term intermittent impacts to water quality from construction activities to less than significant levels.

Operation

The primary constituents of concern during the project operational phase would be solids, oils, and greases from parking areas and driveways that could be carried off-site. Project design features identified in the Water Quality Management Plan (WQMP), included as Appendix 8-1 to this SEIR, such as including the use of decomposed granite for the perimeter pedestrian trail, indoor parking to reduce outdoor parking, and maximizing the use of landscaped areas to reduce impervious areas. Infiltration through landscaped areas would serve as a water treatment function. The Modified Project would also include BMPs to properly manage stormwater flow and prevent stormwater pollution by reducing the potential for contamination at the source. The BMPs could include marking “only rain down the storm drain” on storm drain inlets, preserving existing native vegetation and ground cover to the maximum extent practicable, closing trash receptacles at all times, and sweeping sidewalks regularly to prevent accumulation of litter and debris, as stated in the WQMP. The mix of BMPs have been determined as part of the WQMP. The Modified Project would include a detention basin located at the south of the site.

The detention basin would treat the pollutants of concern via biofiltration through soil media, the decomposed granite and landscaping would allow stormwater to infiltrate into the soil, and indoor parking would reduce the amount of contaminants found in stormwater runoff.

In general, projects must control pollutants, pollutant loads, and runoff volume from the project site by minimizing the impervious surface area and controlling runoff through infiltration, bioretention, or rainfall harvest and use. Projects must incorporate BMPs in accordance with the requirements of the municipal NPDES permit. As with the Original Project, the Modified Project would comply with water quality standards, and impacts would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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 Original Project determined that it would increase the amount of surface runoff, and stated that any losses to recharge opportunities as a result of the Original Project would not cause a significant reduction of either groundwater recharge or flow in the Temecula Valley Groundwater Basin.

The Specific Plan Area is located within Division 5 of the Elsinore Valley Municipal Water District (EVMWD) and while the project site lies in the Temecula Valley Groundwater Basin, water would be supplied by EVMWD from nearby basins (the Elsinore and Temescal Groundwater Basins).

The Elsinore Basin Groundwater Management Plan (EBGMP) addresses the hydrogeologic understanding of the Elsinore Basin, evaluates baseline conditions, identified management issues and strategies, and defines and evaluated alternatives. The primary sources of groundwater recharge in the basin are listed in the plan as:

8. Impacts Found Not to Be Significant

- Recharge from precipitation – Rainfall directly to the basin.
- Surface water infiltration – Recharge from infiltration of surface waters such as streams. The San Jacinto River is the major surface water inflow. Inflow from Lake Elsinore is considered negligible.
- Infiltration from land use – Direct surface recharge from application of water for irrigation.
- Infiltration from septic tanks – Infiltration in areas serviced by septic systems in the basin.

As shown in the Department of Water Resources Bulletin 118, the Elsinore Basin, which is the major source of potable groundwater supply for the EVMWD, has not been identified to be in a state of overdraft (EVMWD 2016a). Furthermore, active groundwater management and conjunctive use programs have been implemented by EVMWD to ensure the balance of inflows and outflows of the Elsinore Basin (EVMWD 2016). Therefore, the Modified Project would not impede sustainable groundwater management of the Basin, and impacts are less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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

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

Less Than Significant Impact. The Original Project determined that it could result in an increase in sediment to receiving waters onsite, and to prevent siltation offsite during construction activities, the Original Project would implement the site design and treatment control BMPs listed in the SWPPP.

Surface water drainage would be controlled by building regulations, with the water directed toward existing streets, flood control channels, storm drains, and catch basins. The proposed drainage for the site would not channel runoff on exposed soils, would not direct flows over unvegetated soils, and would not otherwise increase the erosion or siltation potential of the site or any downstream areas. As discussed above, the Modified Project is subject to NPDES requirements and the countywide MS4 permit. Additionally, the project applicant is required to submit a SWPPP to reduce erosion and sedimentation of downstream watercourses during project construction. Furthermore, the applicant is required to prepare and submit a detailed erosion control plan for City approval prior to obtaining a grading permit. Implementation of this Plan would address any erosion issues associated with proposed grading and site preparation. Although future development would create impervious surfaces on the site, development associated with the Modified Project would result in opportunities for landscaped areas to be utilized for stormwater retention.

The WQMP for the Modified Project includes BMPs designed to prevent erosion during construction, such as installing silt fences and vegetative covers, and preventing soil erosion by minimizing disturbed areas during construction activities. The project-specific WQMP provides BMPs for after construction,

8. Impacts Found Not to Be Significant

such as sweeping sidewalks regularly to prevent accumulation of litter and debris. Therefore, the Modified Project would not result in substantial erosion or siltation on- or off-site. Therefore, this impact is less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. The Original Project stated that the Riverside County Flood Control District requires that the difference in volume between the pre-project condition and post-project condition be detained onsite for the 10-year event. To reduce flow offsite and detain stormwater onsite, the Original Project proposed to install two onsite aboveground detention basins. Onsite analysis was performed to evaluate the pre- and post-construction runoff values in order to size the proposed detention basins and provide proper flow reduction. The total proposed basin peak flow with a 10-year storm event is 15.82 cfs and total basin outflow is 8.35 cfs. This is based on the capacity of 2.94 acre-feet for the detention basin in the single-family residential area and a capacity of 2.60 acre-feet for the detention basin in the multifamily residential area.

The Modified Project would include a detention basin at the southern portion of the site. The existing infiltration basin is sized to contain the entire storm hydrographs for all storm rainfall rates and lengths of storms established in the study except for two scenarios: 5-year and 10-year storms with a duration of 24-hours in length. Compared existing conditions, the 10-year 24-hour storm is reduced by 0.81 cubic feet per second (cfs) and the 5-year 24-hour storm increases by 0.12 cfs (Fuscoe 2020; Appendix 8-2). Additionally, the WQMP includes maintenance guidelines for extended detention basins such as maintaining vegetation as needed during every scheduled maintenance check, removing debris and litter from the entire basin annually, and remove accumulated sediment from the bottom of the basin whenever there is substantial sediment accumulation.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. The Original Project determined that much of the existing drainage onsite and offsite is unimproved. The Original Project stated that it would result in modifications to the existing drainage pattern onsite and would require the installation of an onsite storm drainage system designed for peak 100-year flows.

The Modified Project is required to comply with Wildomar Municipal Code Section 13.12.050, which requires development to comply with a MS4 Permit from the San Diego Regional Water Quality Control Board. A detention basin would be constructed to treat required water quality volume for the project site water quality. Additionally, the Modified Project would include BMPs, such as landscaping, which would

8. Impacts Found Not to Be Significant

help reduce runoff flows. Therefore, increases in runoff would not exceed the capacity of existing stormwater system, and impacts would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The Original Project determined that it would result in changes in absorption rates and the rate and amount of surface runoff from the project site. The Original Project determined that existing stormwater currently flows along two natural drainages into an existing pipe culvert under I-15. Much of the existing drainage onsite and offsite is unimproved. The Original Project determined that it would result in modification of the existing drainage pattern onsite and would require installation of an onsite drainage system designed for peak 100-year flows.

The project site is designated by the Federal Emergency Management Agency (FEMA) as being within Zone Z, indicating minimal risk of flooding (FEMA 2008). Although the proposed project would increase impervious surfaces, the project site is not located within an area of flood risk, and the proposed basin would reduce impacts from on- or off-site flooding. Therefore, impacts are less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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

No Impact. A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. 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. Although there are no large water tanks in the area that could impact the Modified Project site, there are dams in the region that could create flooding impacts. Thirteen dams in the greater Los Angeles area moved or cracked during the 1994 Northridge earthquake. However, none were severely damaged. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act.

The Original Project's EIR did not analyze impacts as a result of inundation; this impact was determined to be less than significant in the Original Project's Initial Study. The project site is not within a flood hazard zone. The project site is not in an area that is subject to seiches, mudflows, or tsunamis due to the absence of nearby bodies of water and mud/debris channels. Additionally, the County of Riverside identified dam inundation hazard areas throughout the county. A review of records maintained at the California Office of Emergency Services provided the potential failure inundation maps for 23 dams affecting Riverside County; these maps were compiled into geographic information system (GIS) digital coverage of potential dam inundation zones. The County's dam inundation zones are identified in Figure S-10 of the Wildomar General Plan. As shown in Figure S-10, the project site is not in any dam inundation hazard zones. In addition, the project site is not in the vicinity of any levees. Therefore, the Modified Project would not be exposed to seiches, mudflows, or tsunami hazards, and no impact would occur.

The Modified Project would not result in new or substantially more severe significant impacts.

8. Impacts Found Not to Be Significant

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

Less Than Significant Impact. The Modified Project would not conflict or obstruct implementation of a water quality control plan. Additionally, the Modified Project would comply with water quality requirements set forth in the Statewide General Construction Permit, the NPDES, and the City of Wildomar Municipal Code Section 13.12 (Stormwater/Urban Runoff Management and Discharge Controls Ordinance). Additionally, active groundwater management and conjunctive use programs have been implemented by the EVMWD to ensure the balance of inflows and outflows of the Elsinore Basin (EVMWD 2016). Therefore, the Modified Project would not impede sustainable groundwater management of the basin, and impacts would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

8.7 MINERAL RESOURCES

Would the project:

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

No Impact. No mineral resources have been identified on the project site or surrounding area. Therefore, as with the Original Project, the Modified Project would not result in the loss of known mineral resources in the region.

The Modified Project would not result in new or substantially more severe significant impacts.

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

No Impact. All of Wildomar is also designated as MRZ-3a, and while it is possible that the site could yield mineral resources, the physical characteristics of the site provide no indication of a unique or valuable mineral resource. Development of the site would not result in the loss of mineral resources; neither the General Plan nor the zoning ordinance designates the site for mining or mineral extraction uses. Therefore, as with the Original Project, no impacts would occur.

The Modified Project would not result in new or substantially more severe significant impacts.

8. Impacts Found Not to Be Significant

8.8 RECREATION

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

Less Than Significant Impact. As stated in the Original Project, the Modified Project would create an extension of the community trail system around the perimeter that connects to the Oak Springs Phase 1 perimeter trail to the north and the trail along Inland Valley Road to the south.

The provision of this regional trail connection is consistent with General Plan policy requiring implementation of the Trails and Bikeway System. As envisioned in the General Plan, the Specific Plan includes a Community Trail along Inland Valley Road traversing the project site. No neighborhood parks are located within a one-mile radius of the project site. The project includes a total of 4.7 acres of active open space. Multiple regional parks within western Riverside County would be available to residents of the Oak Springs Ranch Specific Plan including Bogart Park, Box Springs Mountain Reserve, Hidden Valley Wildlife Area, Kabian Park, Lake Skinner Recreation Area, Louis Robidoux Nature Center, Martha McLean-Anza Narrows Park, Rancho Jurupa Park, and Santa Rosa Plateau Reserve.

The project applicant would be required to pay Quimby fees as well as DIFs, and future property owners would be subject to Wildomar Ordinance 71 parcel tax. With the payment of these fees and taxes, impacts would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. See response to Impact 8.8(a). Implementation of the Modified Project, as with the Original Project, would result in the provision of new recreational opportunities through the preservation of 4.7 acres of open space, which would include a regional trail connection. The construction of amenities associated with recreational facilities within the project area are included as part of the project site's development, as stated in Original Project. The construction or expansion of such areas would not result in an adverse physical effect on the environment beyond those analyzed for the overall development of the project in both the Original Project and this DSEIR. Therefore, as with the Original Project, the Modified Project would result in less than significant impacts.

The Modified Project would not result in new or substantially more severe significant impacts.

8. Impacts Found Not to Be Significant

8.9 TRIBAL CULTURAL RESOURCES

Would the project:

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

No Impact. See response to Impact 8.3(a). The project site is vacant and therefore, there no resources that are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources exists onsite. No impact would occur.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact with Mitigation Incorporated. See response to Impact 8.3(b). The Modified Project would implement Mitigation Measures TRI-1 through TRI-7. The City notified tribes that requested to be alerted of new projects on December 10, 2020, which included the Morongo Band of Mission Indians, Pechanga Band of Mission Indians, Rincon Band of Luiseño Indians, and Soboba Band of Mission Indians; the Rincon Band of Luiseño Indians and Soboba Band of Mission Indians responded. The Rincon Band of Luiseño Indians indicated that they had no additional information to provide and did not request consultation. The Soboba Band of Mission Indians and the Pechanga Band of Luiseño Indians requested consultation.

Per AB 52, the City consulted with the Soboba Band of Luiseño Indians on January 25, 2021 and the Pechanga Band of Luiseño Indians on January 28, 2021; after reviewing the mitigation measures of the Original Project, the tribes asked for potential reburial sites to be identified in the event tribal cultural resources are discovered during construction activities. The City has identified potential reburial sites in areas that are within the project area but not subject to future development, irrigation lines, paving, flooding, or erosion, and reviewed the sites with the tribes. The City provided a confidential map identifying potential reburial sites to the tribes and discussed the potential for additional sites within the project boundaries should they be necessary. The Soboba Band of Mission Indians also requested that the reburial sites be planted with drought-tolerant prickly plants, such as cacti, to be used as a deterrent for foot traffic, and concluded consultation on February 11, 2021. The Pechanga Band of Luiseño Indians asked for a larger reburial site to be identified, and two larger reburial sites were identified. The proposed reburial locations have been approved by the tribes, with restrictions to preclude future development. **Mitigation Measure TRI-7** would place a no-build easement or similar legal instrument

8. Impacts Found Not to Be Significant

ensuring that there would be no future development of the site(s). With mitigation, impacts would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

Mitigation Measures

- **TRI-1: Inadvertent Archeological Find.** If during ground disturbance activities, unique cultural resources are discovered that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to project approval, the following procedures shall be followed. Unique cultural resources are defined, for this condition only, as being multiple artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance as determined in consultation with the Native American Tribe(s).
 - a. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the archaeologist, the tribal representative(s) and the Planning Director to discuss the significance of the find.
 - b. At the meeting, the significance of the discoveries shall be discussed and after consultation with the tribal representative(s) and the archaeologist, a decision shall be made, with the concurrence of the Planning Director, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.
 - c. Grading of further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal monitors if needed.
 - d. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition.
 - e. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the project archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.
 - f. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the Planning Director for decision. The City's Planning Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe. Notwithstanding any other rights available under the law, the decision of the City Planning Director shall be appealable to the City Planning Commission and/or City Council.”

8. Impacts Found Not to Be Significant

- **TRI-2: Cultural Resources Disposition.** In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:
 - a. One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Wildomar Planning Department:
 - i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.
 - ii. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the City under a confidential cover and not subject to Public Records Request.
 - iii. If preservation in place or reburial is not feasible then the resources shall be curated in a culturally appropriate manner at 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 City. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV monitoring report.

- **TRI-3: Archeologist Retained.** Prior to issuance of a grading permit the project applicant shall retain a Riverside County qualified Registered Professional Archaeologist (RPA), to monitor all ground disturbing activities in an effort to identify any unknown archaeological resources.

The Registered Professional Archaeologist and the Tribal monitor(s) shall manage and oversee monitoring for all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition and etc. The Registered Professional Archaeologist and the Tribal monitor(s), shall independently have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with any required special interest or tribal monitors.

8. Impacts Found Not to Be Significant

The developer/permit holder shall submit a fully executed copy of the contract to the Planning Department to ensure compliance with this condition of approval. Upon verification, the Planning Department shall clear this condition.

In addition, the Registered Professional Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a Cultural Resources Management Plan (CRMP) in consultation pursuant to the definition in AB 52 to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting tribe is defined as a tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB 52 consultation process, and has completed AB 52 consultation with the City as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include:

- a. Project grading and development scheduling;
- b. The Project archaeologist and the Consulting Tribes(s) shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new construction personnel that will conduct earthwork or grading activities that begin work on the Project following the initial Training must take the Cultural Sensitivity Training prior to beginning work and the Project archaeologist and Consulting Tribe(s) shall make themselves available to provide the training on an as-needed basis;
- c. The protocols and stipulations that the contractor, City, Consulting Tribe(s) and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.

- **TRI-4: Native American Monitoring (Pechanga).** Tribal monitor(s) shall be required on-site during all ground-disturbing activities, including grading, stockpiling of materials, engineered fill, rock crushing, etc. The land divider/permit holder shall retain a qualified tribal monitor(s) from the Pechanga Band of Luiseno Indians. Prior to issuance of a grading permit, the developer shall submit a copy of a signed contract between the above-mentioned Tribe and the land divider/permit holder for the monitoring of the project to the Planning Department and to the Engineering Department. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist.
- **TRI-5: Native American Monitoring (Soboba).** Tribal monitor(s) shall be required on-site during all ground-disturbing activities, including grading, stockpiling of materials, engineered fill, rock crushing, etc. The land divider/permit holder shall retain a qualified tribal monitor(s) from the Soboba Band of Luiseno Indians. Prior to issuance of a grading permit, the developer shall submit a copy of a signed contract between the above-mentioned Tribe and the land divider/permit holder for the monitoring of the project

8. Impacts Found Not to Be Significant

to the Planning Department and to the Engineering Department. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist.

- **TRI-6: Archeology Report - Phase III and IV.** Prior to final inspection, the developer/permit holder shall prompt the Project Archeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Planning Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the Eastern Information Center (EIC) at the University of California Riverside (UCR) and one (1) copy shall be submitted to the Consulting Tribe(s) Cultural Resources Department(s).
- **TRI-7: No-Build Easement or Similar Instrument.** In the event that Native American artifacts are found and buried within the project vicinity, a no-build easement, or similar legal instrument, shall be used to preclude future development from taking place on the reburial site(s).

8. Impacts Found Not to Be Significant

8.10 UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Less Than Significant Impact.

Water

Water treatment facilities filter and/or disinfect water before it is delivered to customers. The EVMWD supplies water to the surrounding area and would supply water to the project site. Water line improvements at the project site would be constructed in accordance with Title 13, Public Services, of the Wildomar Municipal Code. See response to Impact 8.10(b). The Original Project determined that water demand of the project would not warrant the construction of new water treatment facilities or expansion of existing facilities. The Modified Project would generate water demand approximately 11 percent more than the Original Project. However, the additional demand would not warrant the construction of new facilities. Therefore, the Modified Project would also result in a less than significant impact.

Wastewater Treatment

See response to Impact 8.10(c). As the increase in wastewater generation is insignificant (0.019182 mgd), the Modified Project, as with the Original Project, would not require the construction of new or expansion of existing wastewater treatment facilities. Therefore, impacts would be less than significant.

Storm Water Drainage

The project site is located within the limits of the Riverside County Flood Control and Water Conservation District's (RCFCWCD) Murrieta Creek/Murrieta Valley Area Drainage Plan. As part of the development process, the project applicant would be required to pay fees to the RCFCWCD or the City prior to the issuance of grading permits. The project site is currently undeveloped, and development of the site would increase impervious surfaces. However, drainage on the site has been designed to accommodate post-development water flows. Stormwater drainage improvements would not exceed the capacity of storm drain systems in accordance with the City of Wildomar Municipal Code Section 13.12.050 and the MS4 Permit from the San Diego Regional Water Quality Control Board. With the implementation of BMPs, compliance with local and state laws, and drainage features detailed in the Final WQMP, impacts of the Modified Project, as with the Original Project, would be less than significant relative to the extension of expansion of storm water drainage facilities.

Electricity and Natural Gas

The project site would require connection to utilities such as electricity and natural gas lines in the vicinity of the site in accordance with Municipal Code Section 16.40.010, Installation Requirements, for undergrounding utilities. The applicant would be responsible for payment of electricity and gas connections as well as use of

8. Impacts Found Not to Be Significant

the utility. As described in Section 5.3, *Greenhouse Gas Emissions and Energy*, the Modified Project would not result in energy use such that new or expanded facilities would be required. Therefore, impacts would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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. According to the Original Project, the project would generate a water demand of approximately 145,100 gallons per day (gpd), or approximately 163 acre-feet of water per year, based upon an expected build-out of 103 single-family and 312 multifamily dwelling units.

According to the Original Project, total water demand for the 103 single-family units was approximately 51,500 gpd, and the total water demand for 288 multifamily units, as part the Modified Project would be 68,400 gpd. As the Modified Project would result in an increased water demand of 16,900 gpd, compared to the Original Project, impacts would be similar to the Original Project and would continue to be less than significant, as there would be sufficient water supplies available for the Modified Project.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. The Original Project was estimated to generate approximately 63,600 gallons of wastewater per day (0.064 mgd), based upon an expected build-out of 415 dwelling units. This estimate would be within the treatment capacity of the Regional Water Reclamation Facility (WRF) which is 8.0 mgd.

According to the Original Project EIR, total wastewater generation for the 103 single-family units was approximately 15,758 gpd, and the total wastewater generation for 288 multifamily units, as part the Modified Project would be 34,940 gpd. As the Modified Project would result in a minimal increase in wastewater generation of 19,182 gpd, compared to the Original Project, impacts would be similar to the Original Project. There would be adequate treatment capacity to meet the demands of the Modified Project, and this impact would be less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. The Original Project would result in an additional 424 residential dwelling units within the Wildomar area, resulting in an increase in solid waste disposal to the El Sobrante Sanitary Landfill, the Badlands Disposal Site, and the Lamb Canyon Disposal Site. The El Sobrante Sanitary Landfill is the primary disposal site for the Wildomar area. El Sobrante accepts 16,054 tons per day of solid waste and has

8. Impacts Found Not to Be Significant

a total estimated permitted capacity of 209,910,000 cubic yards (CalRecycle 2019). Currently El Sobrante is at 31.5 percent capacity and has an anticipated closure date of January 2051 (CalRecycle 2019).

The Original Project would result in an increase in approximately 97.5 tons of solid waste per year (0.27 ton per day). An increase of 0.27 ton per day to the El Sobrante Sanitary Landfill would not exceed the landfill's capacity.

The Modified Project would generate 347.8 tons of solid waste per year (0.95 ton per day). The Modified Project would make up approximately 0.006 percent of the landfill's maximum daily throughput and would not exceed this capacity. Furthermore, the project would adhere to federal and state waste diversion requirements. As with the Original Project, the Modified Project would result in less than significant impacts.

The Modified Project would not result in new or substantially more severe significant impacts.

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

Less Than Significant Impact. Solid waste would be generated during construction and operation of the Modified Project. Development of the Modified Project would be subject to the Solid Waste Reuse and Recycling Access Act of 1991. The Act requires that adequate areas be provided for collecting and loading recyclable materials such as paper, products, glass, and other recyclables. City of Wildomar Municipal Code Section 8.104 regulates solid waste handling and mandates that sufficient receptacles be in place onsite to accommodate refuse and recycling. Compliance with state law and the City's Municipal Code, as well as applicable state laws, would ensure the Modified Project, as with the Original Project, would result in a less than significant impact.

The Modified Project would not result in new or substantially more severe significant impacts.

8. Impacts Found Not to Be Significant

8.11 WILDFIRE

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

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

Less Than Significant Impact. See response to Impact 8.5(f). As with the Original Project, the Modified Project would be designed, constructed, and maintained in accordance with applicable standards associated with vehicular access, ensuring that adequate emergency access and evacuation would be provided. Compliance with existing regulations for emergency access and evacuation would ensure that impacts related to this issue are less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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. There are three primary factors used in assessing wildfire hazards – topography, weather, and fuel. The project site is generally flat and is located in an urbanized area that does not have any risks of wildfires, as indicated in the Original Project. The project site would comply with existing regulations governing emergency access and evacuation during construction and operational activities. The combination of urban development that reduces fire fuel, as well as fire requirements such as smoke alarms, sprinklers, and fire hydrants would reduce impacts to less than significant.

The Modified Project would not result in new or substantially more severe significant impacts.

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. As the project site is vacant, the Modified Project would require new infrastructure for electricity, natural gas, telecommunications, and cable services. The utilities would be installed to meet service requirements. The project area is highly urbanized, and the project site is not at risk for fire hazards. The Modified Project would not add infrastructure such as roads or overhead power lines in areas with wildland vegetation. Therefore, impacts related to exacerbating fire risks would be less than significant for the Modified Project.

The Modified Project would not result in new or substantially more severe significant impacts.

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?

Less Than Significant Impact. See responses to Impact 8.4(a.iv) on landslides and Impact 8.11(b) on slopes. The project site is generally flat, is located in an urbanized portion of the city and as stated in the Original

8. Impacts Found Not to Be Significant

Project, does not have a risk of wildfires. The project site is designated by the Federal Emergency Management Agency (FEMA) as being Zone X, indicating minimal risk of flooding. Therefore, it is unlikely that the project site would be susceptible to downslope or downstream flooding or landslides as a result of post-fire slope instability. Therefore, impacts would be less than significant, for the Modified Project.

The Modified Project would not result in new or substantially more severe significant impacts.

8. Impacts Found Not to Be Significant

8.12 REFERENCES

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_____. 2020, December 15. Retention/Infiltration Basin Study. Appendix 8-2.

8. Impacts Found Not to Be Significant

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9. Organizations Consulted and Qualifications of Preparers

Native American Tribes

Pechanga Band of Mission Indians

Rincon Band of Luiseno Indians

Soboba Band of Mission Indians

Qualifications of Preparers

PLACEWORKS

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OAK SPRINGS RANCH PHASE 2 PROJECT: REVISED PLOT PLAN

CEQA FINDINGS OF FACT REGARDING THE FINAL ENVIRONMENTAL IMPACT REPORT (PA 20-0044)

City of Wildomar

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**CEQA FINDINGS OF FACT REGARDING THE
FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
OAK SPRINGS RANCH PHASE 2 PROJECT: REVISED PLOT PLAN
STATE CLEARINGHOUSE NO. 2004071076**

Exhibit A

I. INTRODUCTION

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. This document provides the findings required by CEQA. The potential environmental effects of the proposed Oak Springs Ranch Phase 2 Project (Modified Project) have been analyzed in a Draft Supplemental Environmental Impact Report (Draft SEIR) (State Clearinghouse [SCH] 2004071076) dated April 2021. A Final SEIR has also been prepared that incorporates the Draft SEIR and contains comments received on the Draft SEIR, responses to the individual comments, revisions to the Draft SEIR including any clarifications based on the comments and the responses to the comments, and the Mitigation Monitoring and Reporting Program for the Modified Project (MMRP). This document provides the findings required by CEQA for approval of the Modified Project.

A. Statutory Requirements for Findings

The CEQA (Pub. Res. Code §§ 21000, *et seq.*) and the State CEQA Guidelines (Guidelines) (14 Ca. Code Regs §§ 15000, *et seq.*) promulgated thereunder, require the environmental impacts of a project be examined before a project is approved. Specifically, regarding findings, Guidelines Section 15091 provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
 3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained

workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

- (b) The findings required by subsection (a) shall be supported by substantial evidence in the record.
- (c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.
- (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
- (e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.
- (f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The “changes or alterations” referred to in Section 15091(a)(1) above, that are required in, or incorporated into, the project which mitigate or avoid the significant environmental effects of the project, may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.

B. Certification

Having received, reviewed, and considered the SEIR for the Oak Springs Ranch Phase 2 Project: Revised Plot Plan State Clearinghouse No. 2004071076, as well as other information in the record of proceedings on this matter, the City of Wildomar City Council adopts the following Findings (Findings), in its capacity as the legislative body for the City of Wildomar (City), which is the CEQA Lead Agency. The Findings set forth the environmental and other bases for current and subsequent discretionary actions to be undertaken by the City and responsible agencies for the implementation of the Modified Project.

In addition, the City of Wildomar City Council (City Council) hereby make findings pursuant to and in accordance with Section 21081 of the California Public Resources Code and State CEQA Guidelines Sections 15090 and 15091 and hereby certifies that:

- (1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

C. Project Environmental Report and Discretionary Actions

The Final SEIR addresses the direct, indirect, and cumulative environmental effects of construction and operation activities associated with the Modified Project. The Final SEIR provides the environmental information necessary for the City to make a final decision on the requested discretionary actions for all phases of this project. The Final SEIR was also intended to support discretionary reviews and decisions by other responsible agencies. Discretionary actions to be considered by the City may include, but are not limited to, the following:

- Certify that the Final SEIR for the Modified Project has been completed in compliance with CEQA, and reflects the independent judgement and analysis of the City; find that the City Council has reviewed and considered the information contained in the Final SEIR prior to approving the project; adopt the Mitigation Monitoring and Reporting Program, finding that the Mitigation Monitoring and Reporting Program is adequately designed to ensure compliance with the mitigation measures during project implementation; and determine that the significant adverse effects of the project either have been reduced to an acceptable level, or are outweighed by the specific overriding considerations of the project as outlined in the CEQA Findings of Fact, as set forth herein.
- Approve the Modified Project and related discretionary actions needed for project construction and operation.

II. PROCEDURAL COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT

The City published a Draft SEIR on April 21, 2021. A Final SEIR was prepared in the spring of 2021 in compliance with CEQA requirements. The Final SEIR has been prepared in accordance with CEQA and the CEQA Guidelines, as amended. As authorized in State CEQA Guidelines Section 15084(d)(2), the City retained a consultant to assist with the preparation of the environmental documents. City staff from multiple departments, representing the Lead Agency, have directed, reviewed, and modified where appropriate all material prepared by the consultant. The Final SEIR reflects the City's independent analysis and judgement. The key milestones associated with the preparation of the SEIR are summarized below. As presented below, an extensive public involvement and agency notification effort was conducted to solicit input on the scope and content of the SEIR and to solicit comments on the results of the environmental analysis presented in the Draft SEIR.

A. Public Notification and Outreach

In conformance with CEQA, the State CEQA Guidelines, and the City of Wildomar CEQA Guidelines, the City of Wildomar conducted an extensive environmental review of the Modified Project.

- Completion of a Notice of Preparation (NOP) on December 22, 2020. The public review period extended from December 22, 2020, to January 20, 2021. The NOP was published in the *Press Enterprise* on December 16, 2020. The NOP was posted at the Riverside County Clerk's office on December 16, 2020. Copies of the NOP were mailed to interested persons and organizations.
- Preparation of a Draft SEIR, which was made available for a 45-day public review period beginning April 21, 2021, and ending June 4, 2021. The scope of the Draft SEIR was determined based on the CEQA Guidelines Appendix G Checklist, and comments received in response to the NOP. The Notice of Availability (NOA) for the Draft SEIR was sent to interested persons and organizations, sent to the State Clearinghouse in Sacramento for distribution to public agencies, posted at the City of Wildomar's website, and published in the *Press Enterprise*. The NOA was posted at the Riverside County Clerk's office on April 15, 2021. The Notice of Availability of the Draft SEIR was published in the *Press Enterprise* on April 15, 2021.
- Preparation of a Final SEIR, including the responses to comments to the Draft SEIR. The Final SEIR was released for a 10-day agency review period prior to certification of the Final SEIR.
- Public hearings on the Modified Project, including a Planning Commission hearing and a City Council hearing.

In summary, the City conducted all required noticing and scoping for the Modified Project in accordance with Section 15083 of the CEQA Guidelines, and conducted the public review for the SEIR, which exceeded the requirements of Section 15087 of the CEQA Guidelines.

B. Final Environmental Impact Report and City Council Proceedings

The City prepared a Final SEIR, including Responses to Comments to the Draft SEIR. The Final SEIR/Response to Comments contains comments on the Draft SEIR, responses to those comments, revisions to the Draft SEIR, and appended documents. A total of three comment letters were received.

None of the comment letters resulted in the need to modify the environmental analysis in the Draft SEIR.

The Final SEIR found that prior to mitigation, implementation of the Modified Project will result in potentially significant impacts to Air Quality, Noise, and Transportation, as stated below. However, even with the implementation of mitigation measures (MMs) these impacts would continue to be significant and unavoidable, as identified in the Original Project. As these impacts were already overridden under the Original Project, a Statement of Overriding Considerations does not need to be prepared under the Findings for the Modified Project (numbering is from the 2007 EIR):

Air Quality

- **Impact 5.2-2:** Implementation of the Oak Springs Ranch Specific Plan would violate air quality standards and contribute substantially to an existing or projected air quality violation.
- **Impact 5.2-3:** The Oak Springs Ranch Specific Plan project would result in a cumulatively considerable net increase of criteria pollutants for which the SoCAB is in nonattainment.
- **Impact 5.2-4:** Construction of the Oak Springs Ranch Specific Plan would expose sensitive receptors project to substantial concentrations of PM₁₀ during grading operations.
- **Impact 5.2-6:** The Oak Springs Ranch Specific Plan project would expose sensitive receptors within 500 feet of Interstate 15 to substantial pollutant concentrations.

Noise

- **Impact 5.9-1:** The project would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Traffic and Circulation

- **Impact 5.12-1:** The proposed project would cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system exceeding, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.

The public can view searchable agendas for scheduled City Council meetings and access agenda-related City information and services directly on the following website: http://www.cityofwildomar.org/government/city_council.

The Final SEIR document will be posted for viewing and download with the previously posted Draft SEIR prior to the City's consideration of the Final SEIR and project recommendations on the City's website.

A date for consideration of the Final SEIR and project recommendations at the City Council was set for the Modified Project and notice of the meeting was provided consistent with the Brown Act (Government Code Sections 54950 et seq.). The City Council will take testimony on the Modified Project and may continue on its calendar to a subsequent meeting date in its discretion.

C. Record of Proceedings

For purposes of CEQA and these Findings, the Record of Proceedings for the Modified Project consists of the following documents and other evidence, at a minimum:

- The NOP, NOA, and all other public notices issued by the City in conjunction with the Modified Project.
- The Draft SEIR and Final SEIR for the Modified Project.
- All written comments submitted by agencies or members of the public during the public review comment period on the Draft SEIR.
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the Draft SEIR.
- All written and verbal public testimony presented during a noticed public hearing for the Modified Project.
- The Mitigation Monitoring and Reporting Program.
- The reports and technical memoranda included or referenced in the Final SEIR.
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft SEIR and Final SEIR.
- The Resolutions adopted by the City in connection with the Modified Project, and all documents incorporated by reference therein, including comments received after the close of the comment period and responses thereto.
- Matters of common knowledge to the City, including but not limited to federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings.
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e).

D. Custodian and Location of Records

The documents and other materials that constitute the administrative record for the City's actions related to the Modified Project are at the City of Wildomar – Planning Department, 23873 Clinton Keith Road, Suite 201, Wildomar, CA. The City Planning Department is the custodian of the administrative record for the Project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request of the Planning Department. Additionally, the documents are available online at: <http://www.cityofwildomar.org/cms/One.aspx?portalId=9894827&pageId=10911316>. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

E. Project Location

The project site is within the City of Wildomar in western Riverside County. The entire Oak Springs Ranch Specific Plan site (APN 380250035, 380250038, 380250036) is approximately 48.15 acres and is bound by Clinton Keith Road to the north, Inland Valley Drive to the east, Inland Valley Medical Center and I-15 to the south, and Oak Springs Road to the west. The project site (APN 380250038) is currently vacant; the portion of the Specific Plan area located to the north of the project site has been developed with the 312 multifamily dwelling units. The proposed 288 multifamily dwelling units and amenity building would be in the central portion of the site.

F. Project Objectives

Objectives for the Oak Springs Ranch Phase 2 Project will aid decision makers in their review of the Modified Project and associated environmental impacts:

1. Create land uses that are compatible with and contribute to the surrounding community.
2. Increase the City's multi-family housing stock.
3. Create a high-quality development that enhances the project site and provides indoor and outdoor amenities for existing and future residents of the Oak Springs Ranch Specific Plan.
4. Incorporate architectural design elements that reflect the Contemporary Craftsman Architectural Style per the City's Commercial Design Guidelines.
5. Create a development that is financially feasible and that will contribute to the City's economic base without negatively affecting existing City resources.

G. Project Description

The Modified Project would eliminate the approved 103 single-family dwelling units designated in Planning Area (PA2) of the Specific Plan area to instead construct 288 multifamily dwelling units in nine buildings (3-story, approximately 39 feet and 3-inches-high to the roofline) and one amenity building (1-story, approximately 19 feet and 6-inches-high to the roofline) on 12.89 acres.

III. CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS

A. Format

Section 15091 of the CEQA Guidelines requires that a Lead Agency make a finding for each significant effect for the project. This section summarizes the significant environmental impacts of the Modified Project, describes how these impacts are to be mitigated, and discusses various alternatives to the Modified Project, which were developed in an effort to reduce the remaining significant environmental impacts. All impacts are considered potentially significant prior to mitigation unless otherwise stated in the findings.

This remainder of this section is divided into the following subsections:

Section B, Issues Deemed “No Impact” or “Less Than Significant Impact,” presents topical areas that would result in no impact or less than significant impacts, as detailed in Chapter 8 of the Draft SEIR.

Section C, Findings on “No Impact” and “Less Than Significant Impacts,” presents environmental issues, as identified in Chapter 5 of the Draft SEIR, which would result in no impact or less than significant impacts.

Section D, Findings on Impacts Mitigated to Less Than Significant, presents significant impacts of the Modified Project that were identified in Chapter 5 and Chapter 8 of the Draft SEIR, the mitigation measures identified in the Mitigation Monitoring Program, and the rationales for the findings.

Section E, Significant and Unavoidable Impacts that Cannot be Mitigated to Below the Level of Significance, presents significant impacts of the Modified Project that were identified in the Draft SEIR, the mitigation measures identified in the Mitigation Monitoring Program, the findings for significant impacts, and the rationales for the findings.

Section IV, Alternatives to the Modified Project, presents alternatives to the Project and evaluates them in relation to the findings set forth in Section 15091(a)(3) of the State CEQA Guidelines, which allows a public agency to approve a project that would result in one or more significant environmental effects if the project alternatives are found to be infeasible because of specific economic, social, or other considerations.

Section V, Findings on Responses to Comments on the Draft SEIR and Revisions to the Final SEIR, presents the City’s findings on the response to comments and revisions to Final SEIR, and decision on whether a recirculated Draft SEIR is necessary or not.

B. Issues Deemed No Impact or Less Than Significant Impact

As the Modified Project was prepared pursuant to CEQA Guidelines Section 15163, “the supplement to the EIR need only contain the information necessary to make the previous EIR adequate for the project as revised” and as such, an Initial Study was not prepared, and a NOP was issued without an accompanying Initial Study. In accordance with Section 15128 of the CEQA Guidelines, as described in Chapter 8 of the Draft SEIR, the City concluded that project impacts related to the following topical environmental issues would result in no impact or would be less than significant: Agriculture and Forestry Resources, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Recreation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. Since the following environmental issue areas were determined to have no impact or a less than significant impact, no findings for these issues are required.

1. Agriculture and Forestry Resources

As stated in the Original Project, according to the State Farmland and Monitoring Program (FMMP), the site is not designated as Prime, Statewide Important, Unique, or Locally Important Farmland, nor is it under a Williamson Act (agricultural preserve) contract. The site is not designated as forestland or timberland, nor is there forestland or timberland adjacent to the project site. Therefore, no impact would occur.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to agriculture and forestry resources. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project.

2. Biological Resources

As indicated in the Original Project, the Original Project would result in the direct removal of individual and small populations of common plant species and directly impact wildlife resources through the direct removal of habitat and displacement of wildlife species. However, sensitive plants were not present and are not expected to due to the absence of suitable habitat and soils on the project site.

Grading for the Modified Project would result in impacts to MSHCP-defined riparian/riverine areas consisting of approximately 0.793 acre of permanent impacts to small fringe areas of oak woodland/riparian/riverine habitat associated with slope construction; development would also remove 27 oak trees within California Department Fish and Game (CDFG) jurisdictional area. A total of approximately 2 acres of woodland/riparian habitat mitigation is proposed as part of the project design. Mitigation for permanent impacts to small fringe oak woodland habitat is proposed onsite at an approximate 3:1 ratio, including the creation of 1.5 acres of oak woodland within the conservation area and enhancement of 0.5 acre of riparian vegetation in the northernmost portion of the western branch of the onsite drainages. The implementation of the design features from the Original Project would ensure impacts are less than significant.

The project site contains approximately 0.44 acre of U.S. Army Corps of Engineers jurisdictional waters of the U.S. and approximately 6.37 acres of CDFG jurisdictional waters of the State. Approximately

0.098 acre of Corps jurisdictional waters of the U.S. would be impacted by grading, and permanent impacts to CDFG jurisdictional waters of the State would total approximately 0.79 acre and would result in the take of 27 oak trees within the CFG jurisdictional area. The project would install a total of 2 acres of riparian vegetation enhancement and oak trees within the site. As required by state and federal regulations, the applicant is required to mitigate impacts so that there is no net loss to waters of the U.S. and/or waters or impacts to the value of habitat.

Project implementation would result in disturbances to local wildlife movement for species with home ranges and average dispersal distances entirely contained within the project site. However, project implementation would avoid a majority of Drainage A and its associated tributaries and leave these areas as open space which would allow movement through the site. Additionally, the project would be required to comply with the Migratory Bird Treaty Act to ensure impacts to migratory birds are less than significant. The City does not have a local tree ordinance or ordinance pertaining to the protection of biological resources. The project site is not within or adjacent to a Criteria Cell, a designated Cell Group, or a subunit within the Elsinore Area Plan. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to biological resources. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project.

3. Cultural Resources

The Original Project indicated that the site contained numerous historic resource occurrences that were observed during site reconnaissance. None of the observed historic resources possessed temporarily sensitive characteristics or landmarks that would permit an assignment of age. Based on cartographic evidence, the remains of the four houses onsite are at least 50 years of age and thus represent historical resources. The barn, workshop, building pad, and unidentified concrete features were determined to have been constructed sometime between 1953 and the present, and are therefore considered contemporary features. Based on the eligibility criteria for historical significance, none of the structural remains of the four houses are deemed historical resources eligible for listing on the California Register. Nothing is known about these houses except the fact they were once a part of the Oak Springs Ranch. According to the Original Project, the structural remains of these four houses are not considered significant cultural resources under CEQA. Moreover, there are no formal cemetery on or adjacent to the project site; because the cultural resources search attests to the immediate area's high sensitivity for cultural resources (13 records within a one-mile radius), there is potential for unidentified archaeological resources to be present onsite. In the unlikely event that human remains are discovered during grading or construction activities within the project site, compliance with State law (Health and Safety Code § 7050.5) would be required. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to cultural resources. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project.

4. Geology and Soils

The Original Project indicated that there were no active faults present on site and that no significant impacts due to fault rupture would occur. There is a potential for relatively strong ground motions during the life of the project. The Original Project indicated that compliance with the current California Building Code (CBC) requirements would reduce impacts to less than significant. Liquefaction potential was evaluated for the project site, which found that the majority of soils on the site are not subject to liquefaction, as they are cohesive (clays), medium-dense to dense sands, or bedrock. The project site is located in an area with low to locally moderate susceptibility to seismically induced landslides and rockfalls. Prior to the issuance of grading permits, the project applicant would be required to prepare and submit detailed grading permits as each phase is developed. These plans would be prepared in conformance with applicable standards of the City of Wildomar, and an NPDES permit and SWPPP would be required to address erosion. Soils on the project site were determined to have a very low expansive potential. The Modified Project would be connected to existing wastewater facilities and septic tanks would not be used. Therefore, impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to geology and soils. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project.

5. Hazards and Hazardous Materials

The Modified Project would not include the routine use, transport, or disposal of hazardous materials, and the Modified Project would be consistent with the General Plan policies regarding hazards and hazardous materials. No schools are located within two miles of the project site; given the residential nature of the project, the type of hazardous materials that would be used during construction and operation would be limited. The project site is not listed on any of the searched regulatory databases provided by Environmental Data Resources (EDR). The nearest airport to the project site is the Skylark Field Airport in Lake Elsinore approximately 3.8 miles northwest of the site; the project site is not within the Skylark Airport Influence Policy Area. The project site would be designed, constructed, and maintained in accordance with applicable standards associated with vehicular access, ensuring that adequate access and evacuation would be provided. The areas around the project site are prone to very high, high, and moderate fire risks. However, the project site is in an urbanized area that, according to the City of Wildomar General Plan, does not have any risk of wildfires. Therefore, impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to hazards and hazardous materials. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project.

6. Hydrology and Water Quality

It was determined that the Original Project would not violate any water quality standards or waste discharge requirements. Construction and operational activities would be required to comply with regulations such as the National Pollutant Discharge Elimination System (NPDES) of the Clean Water Act, Section 402; the State of California NPDES General Permit for Construction Activities adopted by the San Diego Regional Water Quality Control Board (SDRWQCB) under the Water Quality General Permit for Construction Activities; the County of Riverside NPDES Municipal Separate Storm Sewer System (MS4) Permit; and the associated Stormwater Management Plan.

The Original Project was determined to result in impacts to two intermittent drainages, and therefore, the Modified Project was determined to require application and issuance of a California Department of Fish and Wildlife Service Streambed Alteration Agreement, a Section 404 Permit from the Army Corps of Engineers, and a Section 401 Water Quality Certification from the SDRWQCB. The Original Project determined that it would increase the amount of surface runoff and stated that any losses to recharge opportunities as a result of the Original Project would not cause a significant reduction of either groundwater recharge or flow in the Temecula Valley Groundwater Basin. The Elsinore Basin has not been identified to be in a state of overdraft. Primary sources of groundwater recharge in the basin include recharge from precipitation, surface water infiltration, infiltration from land use, and infiltration from septic tanks. The Modified Project would not impede sustainable groundwater management of the Basin. With the implementation of BMPs from the Water Quality Management Plan (WQMP) and compliance with the NPDES requirements, countywide MS4 permit, and implementation of the SWPPP, impacts to erosion would be reduced.

The Modified Project would include a detention basin at the southern portion of the site and the BMPs of the WQMP would ensure runoff would not result in flooding. The Modified Project is required to comply with Wildomar Municipal Code Section 13.12.050 which requires development to comply with a MS4 Permit from the San Diego Water Quality Control Board. Also, the basin and BMPs would help reduce runoff and would not exceed the capacity of existing stormwater system. The project site is designated by the Federal Emergency Management Agency (FEMA) as being within Zone Z, indicating minimal risk of flooding. Although the proposed project would increase impervious surfaces, the project site is not located within an area of flood risk, and the proposed basin would reduce impacts from on- or off-site flooding.

The Original Project determined that impacts as a result of inundation were less than significant. The project site is not within a flood hazard zone. The project site is not in an area that is subject to seiches, mudflows, or tsunamis due to the absence of nearby bodies of water and mud/debris channels. In addition, the project site is not in the vicinity of any levees. Moreover, the Modified Project would not conflict with or obstruct implementation of a water quality control plan, and would be required to comply with water quality requirements set forth in the Statewide General Construction Permit, NPDES, and City of Wildomar Municipal Code Section 13.12. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to hydrology and water quality. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project.

7. Mineral Resources

No mineral resources have been identified on the project site or surrounding area. All of Wildomar is also designated as MRZ-3a, and while it is possible that the site could yield mineral resources, the physical characteristics of the site provide no indication of a unique or valuable mineral resource. Development of the site would not result in the loss of mineral resources; neither the General Plan nor the zoning ordinance designates the site for mining or mineral extraction uses. Therefore, no impact would occur.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to mineral resources. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project.

8. Recreation

The Modified Project would create an extension of the community trail system around the perimeter that connects to the Oak Springs Phase 1 perimeter trail to the north and the trail along Inland Valley Road to the south. The Modified Project includes 4.7 acres of open space, multiple regional parks are available to residents, the applicant would be required to pay Quimby fees as well as DIF, and future property owners would be subject to Wildomar Ordinance 71 parcel tax. The construction of amenities associated with recreational facilities within the project area are included as part of the project sites development. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to recreation. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project.

9. Tribal Cultural Resources

The project site is vacant and therefore, there are no resources that are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources exists onsite. Therefore, no impact would occur.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to tribal cultural resources. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project.

10. Utilities and Service Systems

Water line improvements at the project site would be constructed in accordance with Title 13, Public Services, of the Wildomar Municipal Code. The Original Project determined that water demand of the project would not warrant the construction of new water treatment facilities or expansion of existing

facilities. The Modified Project would generate water demand approximately 11 percent more than the Original Project. However, the additional demand would not warrant the construction of new facilities. The increase in wastewater generation is insignificant (0.019182 mgd), and therefore, the construction of new or expanded wastewater treatment facilities is not required. As part of the development process, the project applicant would be required to pay fees to the Riverside County Flood Control and Water Conservation District or the City prior to the issuance of grading permits. Although the site is undeveloped, drainage on the site has been designed to accommodate post-development water flows. Stormwater drainage improvements would not exceed the capacity of storm drain systems in accordance with the City of Wildomar Municipal Code Section 13.12.050 and the MS4 Permit from the San Diego Regional Water Quality Control Board. The project site would be required to connect to utilities such as electricity and natural gas lines in the vicinity of the site in accordance with Municipal Code Section 16.40.010, Installation Requirements, for undergrounding utilities.

The Modified Project would result in an increased water demand of 16,900 gpd compared to the Original Project. The Modified Project would result in a wastewater generation increase of 34,940 gpd compared to the Original Project. The Modified Project would result in a solid waste generation increase of 0.27 ton per day compared to the Original Project. The Modified Project would be required to comply with the Solid Waste Reuse and Recycling Access Act of 1991 and the City of Wildomar Municipal Code Section 8.104. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to utilities and service systems. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project.

11. Wildfire

The Modified Project would be designed, constructed, and maintained in accordance with applicable standards associated with vehicular access, ensuring that adequate emergency access and evacuation would be provided. The project site is generally flat and is located in an urbanized area that does not have any risks or wildfires. The Modified Project would comply with existing regulations governing emergency access and evacuation during construction and operational activities. The Modified Project would require new infrastructure for electricity, natural gas, telecommunications, and cable services. The utilities would be installed to meet service requirements. It is unlikely that the project site would be susceptible to downslope or downstream flooding or landslides as a result of post-fire slope instability. Therefore, impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to wildfire. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project.

C. Findings on “No Impact” and “Less Than Significant Impacts”

The City determined that the Modified Project would have no impact or less than significant impacts, including direct, indirect, and cumulative impacts, for the environmental issues summarized below. The rationale for the conclusion that no significant impact would occur in each of the issue areas is based on the environmental evaluation in the listed topical EIR sections in Chapter 5 of the Draft SEIR.

CEQA Guidelines Section 15901 states that an EIR may not be certified for a project that has one or more significant environmental effects unless one of three possible findings is made for each significance effect. Since the following environmental issue areas were determined to have no impact or a less than significant impact, no findings for these issues are required.

1. Aesthetics

Impact 5.1-1: Would the Modified Project have a substantial adverse effect on a scenic vista and, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the Modified Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality? [Thresholds AE-1 and AE-3]

Scenic Vistas

Scenic vistas and scenic backdrops in the project vicinity include views of the mountain ridgelines from approximately 4,000 feet above mean sea level (amsl) to 10,000 feet amsl. The project site is vacant and located within an urbanized portion of the City that is generally flat. Due to the distance, varying topography, and existing development surrounding the site that includes two-story structures, views of scenic vistas would not be significant impacted.

Visual Character

As shown in Figure 3-2a and Figure 3-2b, *Residential Elevations*, the residential buildings would be three stories, and would have dark and light gray stucco finishes, brown roofing, gray vinyl windows, tan stone veneer, wood railings, and aluminum garage doors and trellises. The amenity building would be one-story and would have a similar façade as the residential buildings – light gray stucco finish, gray vinyl windows, brown roofing, and stone veneer, as shown in Figure 3-3, *Amenity Building Elevation*.

The proposed residential buildings would be up to 39.25 feet in height. According to Section 17.110.020, Planning Area 2, of the Wildomar Municipal Code, the maximum building height is 35 feet. The Modified Project would require a Zoning Ordinance Amendment to revise the development standards for Planning Area 2 to allow an increase in height above 35 feet. As with the Original Project, the Modified Project’s impacts would be less than significant because the Modified Project would construct development that would be similar in height to existing development in the Specific Plan area and surroundings. Impacts would be less than significant with approval of the requested Zoning Ordinance Amendment.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to aesthetics. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.1-2: Would the Modified Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway or substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? [Threshold AE-2]

As indicated in Figure C-9, of the Wildomar General Plan, I-15 which is 735 feet west of the project site, is designated as a State Eligible Highway, but is not officially designated as a State Scenic Highway. Therefore, project implementation would not damage scenic resources, including trees, rock outcroppings, and historic buildings, within a State Scenic Highway. No impact would occur.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to aesthetics. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

2. Air Quality

Impact 5.2-2: Would the Modified Project result in a cumulatively considerable net increase of criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard during long-term operational activities? [Thresholds AQ-2]

Operational emissions associated with the Original Project would not exceed the South Coast AQMD regional thresholds of significance and the potential impacts were found to be less than significant. Buildout of the Modified Project would result in new multifamily residences and associated amenities that would generate an increase in criteria air pollutant emissions from transportation (i.e., vehicle trips), area sources, (e.g., landscaping equipment, architectural coating), and energy (i.e., natural gas used for heating and cooking). As shown in Table 5.2-10 in Chapter 5.2, *Air Quality*, the maximum daily operation emissions would be less than their respective South Coast AQMD regional significance threshold values. Therefore, impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to air quality. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.2-3: Would the Modified Project expose sensitive receptors to substantial pollutant concentrations? [Threshold AQ-3]

Since the certification of the 2007 EIR, Phase 1 of the Original Project in Planning Area 1 has already been built and the area has had significant development. Therefore, the LST analysis for the Modified Project considers these changes and has been updated based on the distance to the nearest sensitive receptor, which would be the Planning Area 1 residences north of the Modified Project site.

Construction-Phase LSTs

The 2007 EIR identified that grading activities would generate substantial concentrations of PM₁₀ and impacts would be significant and unavoidable. As shown in Table 5.2-11 in Chapter 5.2, *Air Quality*, the Modified Project would not generate construction-related onsite emissions that would exceed the screening-level LSTs. Therefore, impacts would be less than significant.

Construction Health Risk

The 2007 EIR did not identify any concentrations of short-term emissions that would constitute a significant health risk as there were no guidelines available at the time of certification. The Modified Project is anticipated to be developed over 24 months, which would limit the exposure of on- and off-site receptors, as construction activities would be temporary. As construction activities would not exceed the screening-level construction LSTs, it is anticipated that construction emissions would not pose a threat to on- or off-site receptors. Therefore, impacts would be less than significant.

Operational Phase LSTs

The 2007 EIR identified that emission levels for area source operations and onsite mobile sources would not exceed the operational LST thresholds and impacts would be less than significant. Operation of the Modified Project would not generate substantial quantities of emissions from onsite, stationary sources. Therefore, impacts would be less than significant.

Carbon Monoxide Hotspots

The Original Project would generate 102 PM peak trips and would not generate significant peak hour vehicle trips that would cause a CO impact. The Modified Project would generate 161 PM peak hour trips, which is also substantially below the peak hour vehicle trips needed to generate a significant CO impact. Therefore, impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to air quality. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.2-4: Would the Modified Project conflict with or obstruct implementation of the applicable air quality plan? [Threshold AQ-1]

The residential uses in the Original Project were determined to be consistent with the South Coast AQMD AQMP and would result in a reduction in emissions from the projected emissions in the General Plan applicable in 2007. The long-term emissions generated by the Modified Project would not produce criteria pollutants that exceed the South Coast AQMD significance thresholds for project operations. Because the Modified Project would not exceed the South Coast AQMD's regional significance thresholds and growth is consistent with regional growth projections, the Modified Project would not interfere with South Coast AQMD's ability to achieve the long-term air quality goals identified in the AQMP. Therefore, impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to air quality. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.2-5: Would the Modified Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? [Threshold AQ-4]

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The 2007 EIR identified less than significant impacts with respect to odor emissions that would affect a substantial number of people. The Modified Project would include multifamily residences and associated amenities, which would not fall within the objectionable odors land uses. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be low in concentration, temporary, and would not affect a substantial number of people. Odor impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to air quality. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

3. Greenhouse Gas Emissions and Energy

Impact 5.3-1: Would the Modified Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? [Threshold GHG-1]

As shown in Table 5.3-5, in Chapter 5.3, *Greenhouse Gas Emissions and Energy*, both the Original and Modified Projects would generate GHG emissions from vehicle trips generated by the project, energy

use, and area sources. Overall, the development and operation of the Original Project and Modified Project would not generate annual emissions that exceed the South Coast AQMD bright-line threshold of 3,000 metric tons of carbon dioxide equivalent per year. The net change in emissions of 1,375 MTCO₂e per year would not exceed the South Coast AQMD bright-line threshold. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to greenhouse gas emissions. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.3-2: Would the Modified Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? [Threshold GHG-2]

CARB Scoping Plan

GHG emissions were not a topic of environmental concern in the Certified EIR. Since the certification of the EIR for the Original Project, Scoping Plans have been adopted to address SB 32, most recently the 2017 Scoping Plan. The Modified Project's GHG emissions would be reduced through compliance with statewide measures that have been adopted since AB 32 and SB 32 were adopted. Therefore, the Modified Project would not conflict with the above statewide strategies identified to implement the CARB Scoping Plan and would not obstruct implementation of the CARB Scoping Plan, and impacts would be less than significant.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

Since the certification of the 2007 EIR, a new RTP/SCS has been adopted. Most recently, SCAG adopted the 2020-2045 RTP/SCS (Connect SoCal) in September 2020. Connect SoCal finds that land use strategies that focus on new housing and job growth in areas rich with destinations and mobility options would be consistent with a land use development pattern that supports and complements the proposed transportation network. Similar to the Original Project, the Modified Project would develop new residences within the City. These new residences would serve the local population within the nearby surrounding communities. Serving the local community may reduce vehicle miles traveled by providing a closer option for future residents. Therefore, the Modified Project would not interfere with SCAG's ability to implement the regional strategies outlined in the Connect SoCal Plan, and impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to greenhouse gas emissions. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.3-3: Would the Modified Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? [Threshold E-1]

Short-Term Impacts During Construction

Electrical Energy

Construction of the Original and Modified Projects would not require electricity to power most construction equipment. Similar to the Original Project, electricity use during the construction of the Modified Project would vary during different phases of construction. The majority of construction equipment during demolition and grading would be gas- or diesel-powered, and later construction phases would require electricity-powered equipment for interior construction and architectural coatings. Impacts would be less than significant.

Natural Gas Energy

It is not anticipated that construction equipment used for the Original or Modified Projects would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, impacts would be less than significant with respect to natural gas.

Transportation Energy

Transportation energy use during construction of the Original and Modified Projects would come from delivery vehicles, haul trucks, construction employee vehicles, and off-road construction equipment. The majority of off-road construction equipment, such as those used during demolition and grading, would be gas- or diesel-powered. The use of energy resources by these vehicles would fluctuate according to the phase of construction. Table 5.3-6, in Chapter 5.3, *Greenhouse Gas Emissions and Energy*, shows the energy consumption during construction (2022 through 2024).

Construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. Construction trips would not result in unnecessary use of energy since the project site is centrally located and is served by numerous regional freeway systems (e.g., I-15 and I-215) that provide the most direct routes from various areas of the region. Energy use during construction of the project would be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant.

Long-Term Impacts During Operation

Electrical Energy

Operation of the Modified Project would consume electricity for various purposes, including but not limited to heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; lighting; and use of onsite equipment and appliances. As shown in Table 5.3-7, of Chapter 5.3, *Greenhouse Gas Emissions and Energy*, the Original Project would generate 893,876 kilowatt hours per year of electricity use at the project site. Implementation of the Modified Project would result in 1,513,026 kilowatt hours of electricity use per year, primarily due to electricity use by the proposed residential units. As with the Original Project, the Modified Project would be required to comply

with Title 24 Standard which were recently updated in 2019 and would be more stringent than the standards that applied to the Original Project. Additionally, the Modified Project would be required to comply with the current CALGreen; therefore, it would not result in wasteful or unnecessary electricity demands. Impact would be less than significant.

Natural Gas Energy

The Original Project would generate an average natural gas demand of 3,387,180 kilo British thermal units per year at the project site. Implementation of the Modified Project would generate an average natural gas demand of 4,506,620 kilo British thermal units per year, primarily due to natural gas use by the proposed residential units. As with the Original Project, the Modified Project would be required to comply with Title 24 Standard which were recently updated in 2019 and would be more stringent than the standards that applied to the Original Project; therefore, it would not result in wasteful or unnecessary gas demands. Impact would be less than significant.

Transportation Energy

As shown in Table 5.3-9, in Chapter 5.3, *Greenhouse Gas Emissions and Energy*, the annual VMT for the Original Project is estimated to be 3,282,840 miles while the Modified Project is estimated to be 7,178,966 miles. The VMT for the Modified Project is higher than the Original Project due to the additional housing units provided by the Modified Project in comparison with the Original Project. In addition, because the Modified Project involves development of more residential housing units than the Original Project, it would provide more opportunities to reside in an urbanized area with nearby amenities and public transit options. Impacts would be less than significant as the Modified Project transportation energy use would not be any more inefficient or wasteful than that of the Original Project.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to energy. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.3-4: Would the Modified Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? [Threshold E-2]

California Renewables Portfolio Standard

The Modified Project also would be subject to the standards mentioned in the 2007 EIR, namely Title 24 of the California Administrative Code. Because the Modified Project would comply with the latest 2019 energy standards, it would offer an improvement over the energy standards of the Original Project. The Modified Project would not conflict or obstruct plans for renewable energy and energy efficiency, and no impact would occur.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to energy. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The

Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

4. Land Use and Planning

Impact 5.4-2: Would the Modified Project physically divide an established community? [Threshold LU-1]

The project site is vacant and surrounded by Planning Area 1 (multifamily residential) to the north, Planning Area 3 and Inland Valley Drive to the east, and Planning Area 3 (open space) to the south and west. As with the Original Project, the Modified Project would not divide an established residential community. The Modified Project would complement the existing Planning Area 1 development and would share amenities on the project site, so it would not divide an established community. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to land use and planning. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.4-3: Would the Modified 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? [Threshold LU-2]

City of Wildomar General Plan

The project site is currently designated Medium High Density Residential (MHDR) which allows for single-family residences; as the Modified Project proposes to develop multifamily dwelling units, a General Plan Amendment would be required to change the designation to Highest Density Residential (HHDR). Moreover, the project site would require a Specific Plan Amendment to change the designation of the site from Oak Springs SP PA2 Ranch Detached Residential to Oak Springs Ranch SP PA2 Multifamily Residential for the Modified Project. To remain consistent with the rest of the open space area in the Specific Plan Area, a General Plan Amendment is required to change the designation of a portion of the open space area (southern tip) from Light Industrial (LI) to Conservation Habitat (OS-CH). Upon approval of the requested General Plan Amendment, the Modified Project would be consistent with General Plan designations.

The Modified Project would be consistent with the policies of the General Plan. For example, Policies LU-3.1 and LU 4.1 call for the replanning of existing specific plans for higher density and compact development, and new developments to visually enhance the surrounding areas. Impacts would be less than significant.

City of Wildomar Zoning and Specific Plan

The project site is currently designated as Specific Plan No. 340 (Planning Area 2) which allows for one family dwellings. As the Modified Project proposes to develop multifamily dwelling units, a

Zoning Ordinance Amendment would be required to delete Section 17.110 SP Zone Requirements and Standards for Specific Plan No. 340 in its entirety and development of the Modified Project will comply with the development standards of SP No. 340, as amended. With approval of the requested Zoning Ordinance, the Modified Project would be consistent with the zoning and specific plan designations.

SCAG 2020-2045 RTP/SCS Consistency

The Modified Project is considered a project of regionwide significance under the criteria in SCAG's Intergovernmental Review Procedures Handbook and Section 15206 of the CEQA Guidelines because the Modified Project would require a general plan amendment. As described in Table 5.4-1, in Chapter 5.4, *Land Use and Planning*, the Modified Project is generally consistent with the overarching goals of the RTP/SCS. The Modified Project would result in an increase in housing density within a half mile of transit. Therefore, the Modified Project is consistent with SCAG's RTP/SCS. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to land use and planning. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

5. Noise

Impact 5.5-1: Would the Modified Project result in the generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? [Threshold N-1]

Construction Noise

The Modified Project would replace the approved 103 single-family dwelling units designated in PA 2 of the Specific Plan area with 288 multi-family dwelling units and one amenity building. The Modified Project would temporarily elevate noise levels above the existing ambient during construction. However, the Modified Project would not result in an increase of disturbed area and would be the 288 multi-family units on the same area (12.89 acres) as the Original Project. Anticipated construction activities, equipment, and noise levels would be similar to those already analyzed in the 2007 EIR. The 2007 EIR identified the nearest residential receptor to be approximately 367 feet to the north as measured from the edge of the project site to the residence. While Phase 1 of the Specific Plan resulted in the construction of apartments that are now occupied, because they were part of the Original Project, they are not considered new sensitive receptors. Therefore, the nearest residential receptor is approximately 830 feet to the north from the Modified Project's site boundary. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to noise. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The

Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.5-2: Would the Modified Project result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? [Threshold N-2]

Mobile Noise Sources

The increase in residential density would result in a greater number of trips and ADT compared to the Original Project for Phase 2. The approved 103 single-family homes were forecasted to generate 972 daily trips and the Modified Project is forecasted to generate 2,108 daily trips, resulting in a net increase of 1,136 daily trips. As shown in Table 5.5-5, of Chapter 5.5, *Noise*, traffic noise, due to the Modified Project, would increase by up to 0.3 dBA CNEL. Therefore, the Modified Project would not result in a traffic noise increase of 5 dBA or greater where the ambient noise level is less than 65 dBA CNEL, nor a traffic noise increase of 3 dBA or greater where the ambient noise level is greater than 65 dBA CNEL. Impacts would be less than significant.

Stationary Sources

Stationary noise impacts associated with the Original Project were identified to be minimal and less than significant. The Modified Project is also a residential development and therefore, would not be a substantial stationary noise producer but would introduce two new types of noise sources. The first would be from the proposed extension of the perimeter trail which would be extended to the north and along Inland Valley Road to the south. The trail would generate minimal noise from passive hikers and occasional talking. The second would be from the proposed dog park which would be located on the northeast corner of the project site, adjacent to Inland Valley Drive. The nearest noise-sensitive receptor to the proposed dog park is approximately 850 feet to the north, across Clinton Keith Road. Noise levels from the dog park would attenuate and be acoustically masked by existing traffic along Clinton Keith Road. Impacts would be less than significant.

The 2007 EIR indicated that helicopter noise from Inland Valley Medical Center would exceed the County of Riverside's stationary source noise standards, and it was determined that exterior noise mitigation for the Original Project is not practical for helicopter operations as helicopter noise would "go over" any walls erected to attempt to mitigate such noise. The Modified Project would not worsen helicopter noise impacts. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to noise. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.5-3: Would the Modified Project result in the generation of excessive groundborne vibration or groundborne noise levels? [Threshold N-2]

Construction Vibration

Potential vibration impacts associated with development projects are usually related to the use of heavy construction equipment during the grading phases of construction. Major grading has already occurred on the site. Construction can generate varying degrees of ground vibration depending on the construction procedures and equipment. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels.

Although the nearest identified vibration sensitive receptor to the construction site under the Original Project were the hospital, approximately 600 feet to the south, and the single-family residences approximately 367 feet to the north, the 2007 EIR analyzed vibration levels at a distance of 100 feet. Under the Modified Project, the residences to the north and the hospital to the south would remain the nearest vibration sensitive receptors to the site. At 100 feet, the 2007 EIR found vibration levels to be less than significant. As the Modified Project does not involve construction closer than the Original Project, there would be no change and no increase in the impacts previously identified.

Operational Vibration

Once constructed, the Modified Project would not contain uses that would generate groundborne vibration. Therefore, impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to noise. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.5-4: Would the Modified Project expose people residing or working in the project area to excessive noise levels, for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport? [Threshold N-3]

The Initial Study for the Original Project would that the project would not expose people residing or working in the project area vicinity to excessive airport-related noise. The nearest airport or airstrip to the Modified Project is the French Valley Airport in the City of Murrieta, approximately 6.3 miles to the east. The proximity to an airport or airstrip to the project site would not change under the Modified Project, nor would it expose future residents or workers to excessive noise levels. Therefore, impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to noise. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The

Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

6. Population and Housing

Impact 5.6-1: Would the Modified 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)? [Threshold P-1]

Construction

Construction of the Modified Project would require contractors and laborers. Because of the size of the Modified Project, the City expects that the supply of general construction labor would be available from the local and regional labor pool. The Modified Project would not result in a long-term increase in employment from short-term construction activities. Impacts would be less than significant.

Population

Once the Modified Project is complete, the 288 multifamily dwelling units would be expected to add 853 residents. When compared to the 2020 estimated population of 37,183, the Modified Project would result in an approximately 2.56 percent increase in Wildomar's population. If the Modified Project's population is added to the existing population estimate, the resulting population would remain below the SCAG 2020 projection. Therefore, the Modified Project would not exceed SCAG population projections. Impacts would be less than significant.

Housing

The new 288 units would increase housing in the City by 2.35 percent and would represent 4.53 percent of the City's forecast housing growth of 6,365 units from 2020 to 2045. The Modified Project would be within SCAG's projected housing growth. The Modified Project addresses the need for additional housing to accommodate population growth in the City, by increasing the number of dwelling units approved under the Original Project. Impacts would be less than significant.

Jobs-Housing Balance

The jobs-housing ratio for the City is housing-rich (0.72 jobs per dwelling unit). The Modified Project would decrease the jobs-housing ratio to 0.70 jobs per dwelling unit by adding 288 additional dwelling units. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to population and housing. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.6-2: Would the Modified Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? [Threshold P-2]

The project site is currently vacant. The Modified Project would result in the development of 288 multifamily dwelling units instead of 103 single-family dwelling units approved under the Original Project. According to RHNA for the 2013-2021 Housing Element cycle, the City's share of regional housing needs is 2,535 new units. As the project site is currently vacant, the Modified Project would not displace people and/or housing, but would help the City meet its regional needs goal by increasing the supply of housing units in the City compared to existing conditions.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to population and housing. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

7. Public Services

Impact 5.7-1: Would the Modified Project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services? [Threshold FP-1]

The Riverside County Fire Department (RCFD) Fire Station #61 is the primary fire station providing service to the project site, and is approximately 2.30 miles northwest of the project site. The Modified Project would likely increase the number of service calls and demand for fire services compared to the Original Project. However, the Modified Project would comply with the California Fire and Building Codes and City Ordinances. As part of the Modified Project Review, the project plans and notice of preparation were provided to the RCFD. The RCFD has not indicated any service issues with either the design or the size of the project. A standard condition of approval for the projects in the City requires compliance with the requirements of the RCFD and the payment of standard City development impact fees, which include a fee for fire service impacts. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to fire protection services. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.7-2: Would the Modified Project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental impacts, in order to

maintain acceptable service ratios, response times or other performance objectives for police protection services? [Threshold PP-1]

The Riverside County Sheriff Department (RCSD) station in Lake Elsinore is the primary sheriff's station providing service to the project, and is approximately 7.3 miles northwest of the site. The Modified Project would likely increase the number of service calls and demand for police protection compared to the Original Project due to the increase in dwelling units.

The Modified Project is not anticipated to induce substantial growth in the area, but would serve to provide housing for a portion of the projected population growth of the City, and therefore, would not be expected to substantially increase the demand for police protection services or require new facilities. Regardless, as a standard condition of approval for projects in the City, the project applicant is required to pay standard development impact fees, which include a fee for police service impacts to offset potential demand associated with development. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to police protection services. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.7-3: Would the Modified Project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services? [Threshold SS-1]

The Modified Project would generate approximately 181 students, whereas the Original Project would have generated 65 students. The City provides a Notice of Impact Mitigation Requirement to an applicant for a building permit, who then works with the school district to determine the precise amount of school impact fees. Payment of impact fees in compliance with SB 50 would reduce potential impacts to an acceptable level. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to school services. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.7-4: Would the Modified Project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services? [Threshold LS-1]

The only library in the City of Wildomar, Wildomar Branch Library, is approximately 3.55 miles northwest of the project site. The Modified Project would generate demand for 477 square feet of

library, which is an increase of 343 square feet from that of the Original Project. It should be noted that the Riverside County Public Library System also provides a wide range of electronic and digitized resources that do not require physical library space including eBooks and audiobooks. The required square footage would not warrant the construction of a new library or the expansion of the Wildomar Branch Library as the required square footage is not a substantial increase and the proposed demand for library services could be accommodated through the use of electronic and digitized resources. Additionally, the increase in population would require an additional 2,383 volumes. Impact fees are assessed on new development to help pay for public infrastructure required to accommodate the new development, which come from property tax revenue; library fines; and state, federal, or government aid. Funding would proportionally increase as development occurs. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to library services. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

8. Transportation

Impact 5.8-1: Would the Modified Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? [Threshold T-1]

The Original Project determined that impacts would be significant and unavoidable, even after the implementation of mitigation measures, as funding and coordination with other agencies could not be guaranteed. No infrastructure deficiencies would occur to any of the studied intersections despite the addition of project traffic. This is due to the change in delay being less than 5.0 seconds for intersections that are operating at a LOS E or worse. There are also no intersections that degrades from an acceptable LOS D or better to a LOS E or F. Therefore, no improvements would be required, and no conflicts related to LOS would occur.

The Modified Project would have a net trip generation increase from the previous existing entitlement of 1,136 ADT with 56 AM (11 in/45 out) peak hour trips and 59 PM (37 in/22 out) peak hour trips. Although no deficiencies were identified due to the addition of project traffic, as with the Original Project, the Modified Project would contribute its fair share fees in the funding of offsite improvements as required where applicable by the following programs such as the TUMF, DIF, and RBBD. The Original Project implemented all of the intersection improvements shown in Table 5.8-2 of Chapter 5.8, *Transportation*, except for Driveway #4 at Inland Valley Drive. The Modified Project would include improvements at Driveway #4 as extraordinary benefits. Impacts would be less than significant.

Public Transit and Bicycle Plans

The Riverside Transit Agency (RTA) Bus Route 23, Clinton Keith-Wildomar Trail, stop operates along Clinton Keith Road and is approximately 0.2-mile northwest of the site, and Bus Route 23, Inland Valley Dr, operates along Inland Valley Drive and is approximately 520 feet southeast of the

site. There is a regional trail, which is approximately 1-mile long, to the south of the Specific Plan area. The Modified Project would create an extension of the community trail system around the perimeter that connects to the Oak Springs Phase 1 perimeter trail to the north and the regional trail along Inland Valley Road. The Modified Project would be checked for compliance with standards of applicable plans as part of the City's site plan review process. Therefore, impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to transportation. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.8-2: Would the Modified Project conflict or be inconsistent with CEQA Guidelines § 15064.3 subdivision (b)? [Threshold T-2]

The VMT analysis was added to the CEQA Guidelines in 2019, and therefore, VMT was not addressed in the 2007 EIR for the Original Project.

Unlike urban areas that have many transit options, communities like Wildomar are limited in the mitigation that can apply to reduce VMT. Lack of high-quality transit also reduces the potential for transit-oriented design (TOD).

WRCOG evaluated several mitigation strategies designed to reduce VMT for applicability in the City such as diversifying land use, improving pedestrian networks, and implementing traffic calming infrastructure. The measures are intended to apply at the City level; however, project specific design elements are included in the Modified Project and would be consistent with the larger City effort to connect sidewalks and trails to encourage non-motorized transportation. Considered in its entirety, the Modified Project is high-density residential development, and it is possible that employees at the nearby industrial facilities, medical facilities, or commercial retail would be residents of the Modified Project, and could walk to their places of employment.

The Modified Project's calculated VMT would be 20.67, which is below the City's threshold of 31.88. Similarly, the Original Project's VMT would have also been below the VMT threshold for the City. Compared to the Original Project's VMT, the Modified Project would be less than the Original Project's VMT. As the Modified Project's VMT is below the City's threshold, VMT reduction measures would not be required. Impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to transportation. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

Impact 5.8-3: Would the Modified Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible (e.g., farm equipment), or result? [Threshold T-3 and T-4]

Project Access Analysis

The Modified Project's driveway, which would be located along Inland Valley Drive, was analyzed as an unsignalized one-way stop-controlled intersection for a level of service in the Existing plus Project and Near Term plus Project conditions. As shown in Table 5.8-8 and Table 5.8-9, of Chapter 5.8, *Transportation*, the project driveway would operate at an acceptable LOS D or better in Existing Plus Project and Near Term Plus Project Conditions for both the AM and PM peak hours. The driveway was configured to have an eastbound left turn lane out and an eastbound right turn lane out to reduce possible queuing, additionally, Inland Valley Drive was assumed to remain a shared through-right turn lane for the southbound direction and a shared through-left for the northbound direction even though the exiting entitlement report shows a northbound left turn entering the project site.

The lane configurations for Inland Valley Drive at the Project Driveway were done with a northbound shared through/left lane due to right-of-way constraints from the adjacent habitat, and lack of vehicular demand for the left turn lane. The driveway would operate at an acceptable LOS with minimal change with the inclusion of the northbound left turn lane.

The addition of the left turn lane would result in minimal improvements to the LOS of the driveway. Therefore, if a left turn lane could not be feasibly included due to right-of-way constraints, the project driveway would still operate at an acceptable LOS.

Sight Distance Evaluation

The Modified Project would include access via Inland Valley Drive. Inland Valley Drive is a two-lane street. The TIA state that the sight distance for the proposed project is adequate with no obstructions present. The Modified Project would be checked for compliance with these standards as part of the City's review process. Additionally, access to the project site would be reviewed by the City and the CAL FIRE/RCFD to ensure there is sufficient emergency access provided at the site as required by the City of Wildomar Municipal Code 8.28, Fire Code, for compliance with the California Fire Code. Therefore, impacts would be less than significant.

Finding. The Modified Project would have a less than significant direct, indirect, and cumulative impact relating to transportation. Accordingly, no changes or alterations to the Modified Project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Modified Project would not result in new or substantially more severe significant impacts in this regard when compared to the Original Project.

D. Findings on Significant Environmental Impacts that can be reduced to a Less Than Significant Level

The following summary describes impacts of the Modified Project that, without mitigation, would result in significant adverse impacts. Upon implementation of the mitigation measures provided in the SEIR, these impacts, from Chapter 5 and Chapter 8, would be considered less than significant.

CHAPTER 5

1. Aesthetics

Impact 5.1-3: Would the Modified Project create a new source of substantial light and glare which would adversely affect day or nighttime views in the area? [Threshold AE-4]

Nighttime Light and Glare

As the project site is vacant, it does not contain existing sources of nighttime illumination. However, there is currently onsite light and glare caused by the surrounding land uses and roadways. The Modified Project would include nine residential buildings and one amenity building on the project site, as well as their related lighting sources (vehicle lights, security lights, and exterior lighting). Additionally, the proposed structures would likely also result in exterior glazing (e.g., windows and doors) that could result in new sources of glare. Despite new sources of nighttime illumination and glare, the Modified Project is not expected to generate a substantial increase in light and glare. With implementation of mitigation measures identified in the 2007 EIR, lighting would be directed to not cause light to spill outside of the project site. Additionally, the Modified Project would adhere to development standards and design guidelines of the City of Wildomar and General Plan which regulate lighting, such as Chapter 8.64 of the Wildomar Municipal Code. The proposed landscaping and buildings would block glare from parked cars and traffic from surrounding roadways and land uses.

Daytime Glare

The 2007 EIR concluded that the Original Project must adhere to the Riverside County Ordinance No. 655 Regulating Light Pollution, which restricts the use of certain light fixtures emitting undesirable light rays into the night sky. The 2007 EIR concluded that the implementation of Mitigation Measures 5.1-3A through 5.1-3F would reduce impacts to less than significant.

The Modified Project includes building materials and architectural treatments that could cause daytime glare, but would be similar to the buildings constructed for Planning Area 1. The development of the Modified Project would produce glare sources that are typical of residential buildings, such as building material, and vehicles parked and traveling along neighboring streets.

Mitigation Measure:

The following mitigation measures, from the 2007 EIR which have been modified using *italic underline* or ~~strikeout~~ to be consistent with the analysis in this Draft SEIR, were included in the Draft SEIR and the Final SEIR, and are applicable to the Modified Project.

- **Mitigation Measure 5.1-3A:** New lights would be situated and arranged so that no direct beam would leave the project site and no lighting would be directed to Planning Area 3, the conservation area. Luminaries shall be provided with filtering louvers and hoods. During installation, the luminaries shall be aimed and corrected by a field crew to aim the lights away from viewers. Light fixtures installed shall be designed and constructed so that 90 percent of light rays emitted by the fixture are projected below the horizontal plane passing through the lowest point of the shield.
- **Mitigation Measure 5.1-3B:** Onsite buildings shall use low-reflective glass and building materials to keep daytime glare to a minimum.
- **Mitigation Measure 5.1-3C:** All exterior lights shall be shielded where feasible and focused to minimize spill light into the night sky or adjacent properties in accordance with Wildomar Municipal Code Chapter 8.64, County Ordinance No. 655, Zone B, restrictions on onsite lighting.
- **Mitigation Measure 5.1-3D:** New exterior lighting used for security purposes in the evening would be limited to low wattage, energy-conserving night lighting.
- **Mitigation Measure 5.1-3E:** Outdoor lighting that conforms with Wildomar Municipal Code Chapter 8.64 to Ordinance No. 655 shall be shown on electrical plans submitted prior to the issuance of building permit and shall be reviewed and approved by the Building and Safety Department. Prior to final building inspection, outdoor lighting shall be inspected by the Building and Safety Department to ensure compliance with the approved lighting plan.
- **Mitigation Measure 5.1-3F:** Landscaping shall be installed per the approved plan and inspected by the Planning Department prior to Final Building Inspection.

Finding:

Changes or alterations have been required in, or incorporated into, the Modified Project that avoid or substantially lessen the significant environmental effect as identified in the Draft SEIR. These changes are identified in the form of the mitigation measures above. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project. The City of Wildomar hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

Rationale for Finding

The mitigation measures would require that lights be directed within the project site, buildings use low-reflective glass and materials, exterior lights be shielded, exterior lights be low wattage, outdoor lighting conforming with City of Wildomar Municipal Code Chapter 8.64, and landscaping be installed per the approved plan which would reduce light and glare impacts to less than significant.

2. Air Quality

Impact 5.2-1: Would the Modified Project result in a cumulatively considerable net increase of criteria pollutant for which the project region is in non-attainment under an

applicable federal or state ambient air quality standard during construction activities? [Threshold AQ-2]

Construction of the Modified Project would generate criteria air pollutants associated with construction equipment exhaust and fugitive dust from various construction activities.

Construction emissions associated with the Original Project were found to be significant and unavoidable, even with the incorporation of Mitigation Measure 5.2-2A and Mitigation Measure 5.2-2B. As shown in Table 5.2-9, of Chapter 5.2, *Air Quality*, the maximum daily emissions for VOC, CO, SO₂, PM₁₀, and PM_{2.5} from construction-related activities of the Modified Project would be less than their respective South Coast AQMD regional significance threshold values. However, the construction-related NOx emissions generated from rough grading and soil hauling activities would exceed the South Coast AQMD regional significance threshold. Consequently, construction of the Modified Project could potentially contribute to the nonattainment designations of the SoCAB in the absence of mitigation. Therefore, construction of the Modified Project is conservatively deemed to have a new potentially significant impact as a result of the additional soil haul required.

Mitigation Measure:

The following mitigation measures, from the 2007 EIR as well as a newly added mitigation measure, were included in the Draft SEIR and the Final SEIR, and are applicable to the Modified Project.

- **Mitigation Measure 5.2-2A:** The property owner/developer shall implement standard mitigation measures in accordance with South Coast AQMD Rules 402 and 403 to control fugitive dust emissions and ensure that nuisance dust conditions do not occur during construction. In addition to the standard measures, the property owner/developer shall implement supplemental measures as feasible to reduce fugitive dust emissions to the extent feasible during construction operations, in addition to mitigation measures to reduce construction-related emissions of NOx, PM₁₀, and VOCs. To assure compliance, the County shall verify compliance with these measures during normal construction site inspections. The measures to be implemented are listed below:
 - Apply soil stabilizers to inactive areas
 - Replace ground cover in disturbed areas quickly
 - Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph
 - Water the haul route and exposed surfaces three times per day
 - Use of construction equipment with low emission factors and high energy efficiency where possible
 - Perform regulatory scheduled engine maintenance (off-site) to minimize equipment emissions
 - Use of electric- or diesel-powered equipment rather than gasoline powered engines where feasible
- **Mitigation Measure 5.2-2B:** The developer shall use zero Volatile Organic Compounds (VOC) content architectural coatings during the construction of the project to the maximum extent feasible. Use of Zero-VOC paints assumes no more than 100 gram/liter of VOC.

AQ-1 During construction, the construction contractor(s) shall limit the hauling of soil generated from grading/excavation activities to a maximum of 140 trucks per day (1,350 one-way soil haul trips per day if 16 cubic yard trucks are used; or 675 one-way soil haul trips if double haul trucks with a 30 cubic yard capacity is used; and assuming a one-way haul distance of 65 miles). The developer is required to find an export site within a 65-mile radius, and if one cannot be located, then the truck trips per day will need to be reduced to ensure impacts remain less than significant. Haul trucks with engines that are 2010 or newer shall be used for soil hauling activities. These requirements shall be noted on all construction management plans and verified by the City of Wildomar Building & Safety Department prior to issuance of any construction permits and during the soil-disturbing phases.

Finding:

Changes or alterations have been required in, or incorporated into, the Modified Project that avoid or substantially lessen the significant environmental effect as identified in the Draft SEIR. These changes are identified in the form of the mitigation measures above. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project. The City of Wildomar hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

Rationale for Finding

The mitigation measures would require the property owner to implement standard mitigation measures in accordance with South Coast AQMD Rules 402 and 403 to control fugitive dust emissions and ensure that nuisance dust conditions do not occur during construction, the property owner to use zero Volatile Organic Compounds (VOC) content architectural coatings during construction of the project, and the construction contractor shall limit the hauling of soil generated from grading/excavation activities to a maximum of 140 trucks, which would reduce air quality impacts to less than significant.

CHAPTER 8

1. Cultural Resources

8.3(b) **Would the project cause a substantial adverse change in the significance of an archaeological resources pursuant to §15064.5?**

According to the Original Project, no resources have been mapped on the project site or within the immediate surrounding area; however, there are 13 archaeological sites within a one-mile radius of the project site. The project site was not included on a list of archaeological sites. Grading activities associated with the site may uncover undiscovered prehistoric archaeological resources. With the implementation of the following mitigation measures, impacts of the Modified Project, as with the Original Project, would be less than significant.

Mitigation Measure:

The following mitigation measures, from the 2007 EIR, were included in the Draft SEIR and the Final SEIR, and are applicable to the Modified Project.

- **Mitigation Measure 5.4.2A:** Prior to the issuance of any grading permit, the project applicant shall provide written evidence to the County of Riverside that the applicant has retained a qualified archaeologist, who meets the Secretary of the Interior's Standards for archaeologists, to monitor construction activities in all cases that disturb the ground surface. A Registered Professional Archaeologist (RPA) should, at minimum, supervise any monitoring activities. Special care/observation should be given during excavation activities within the immediate vicinity of the four structural remains. Should any subsurface cultural resources be encountered, the archaeological monitor shall have the authority to halt grading activities until uncovered resources are evaluated and a determination of significance is made. If prehistoric resources are encountered, the Pechanga Tribe, the project applicant and the County of Riverside shall evaluate the significance of the resources and if appropriate, shall determine appropriate treatment and mitigation of the resources. If historic artifacts are recovered, any eligibility testing and/or determination of additional mitigation should be done in consultation with the Pechanga Tribe.
- **Mitigation Measure 5.4.2B:** The applicant must retain a monitor from the Pechanga Tribe. Tribal monitors from the Pechanga Band of Luiseño Indians shall be allowed to monitor all grading, excavation and ground-breaking activities, including further surveys, to be compensated by the project applicant/developer. The Pechanga Tribe monitors will have the authority to temporarily stop and redirect grading activities to evaluate the significance of any archeological resources discovered on the property, in conjunction with the project archeologist and the County of Riverside.

Finding:

Changes or alterations have been required in, or incorporated into, the Modified Project that avoid or substantially lessen the significant environmental effect as identified in the Draft SEIR. These changes are identified in the form of the mitigation measures above. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project. The City of Wildomar hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

Rationale for Finding

The mitigation measures require that the project applicant retain a qualified archaeologist to monitor ground disturbing activities and halt grading activities until a determination of significance is made if resources are found, and that a tribal monitor from the Pechanga tribe be allowed to monitor all grading, excavation, and ground-breaking activities. These mitigation measures would reduce impacts to less than significant.

2. Geology and Soils

8.4(c)	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, subsidence, liquefaction, or collapse?
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The project site is not located in an area mapped as having the potential for liquefaction. The project site is located in an area with low to locally moderate susceptibility to seismically induced landslides and rockfalls.

The project site is not located within an area of potential ground subsidence. The geotechnical evaluation states that due to the site topography, cut/fill transitions would be needed for the proposed building pads in order to mitigate potential differential settlement. During grading, subsidence is expected to occur. Implementation of the recommended geotechnical mitigation measures would ensure that potential ground subsidence impacts resulting from the Modified Project would not exceed an amount that could harm the proposed structures.

Mitigation Measure:

The following mitigation measures, from the 2007 EIR, were included in the Draft SEIR and the Final SEIR, and are applicable to the Modified Project.

- **Mitigation Measure 5.5-2A:** The project shall include a 5- to 10-foot-thick zone of compacted fill below the slab and footings. This mitigation measure shall be identified in the grading plan and then verified in the field as each stage of construction occurs. Implementation of the proposed mitigation will not cause any additional area to be disturbed on the site or any additional environmental impacts, other than additional equipment excavation and compaction to achieve high densities of compacted material.
- **Mitigation Measure 5.5-2B:** The project shall remove and replace all upper fills/disturbed soils with properly compacted fills.
- **Mitigation Measure 5.5-2C:** Any vegetation shall be removed and hauled from proposed grading areas prior to the start of grading operations. Existing vegetation shall not be mixed into the soils. Any removed soils may be reutilized as compacted fill, once deleterious and oversized (greater than eight inches) materials have been removed.

Finding:

Changes or alterations have been required in, or incorporated into, the Modified Project that avoid or substantially lessen the significant environmental effect as identified in the Draft SEIR. These changes are identified in the form of the mitigation measures above. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project. The City of Wildomar hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

Rationale for Finding

The mitigation measures would require the inclusion of a 5- to 10-foot-thick zone of compacted fill below the slab and footings, removal and replacement of all upper fills/disturbed soils with properly compacted fills, and would require vegetation to be removed and hauled from grading areas prior to the start of grading operations. Impacts would be reduced to less than significant.

8.4(f)	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
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As stated in the Original Project, the project site is underlain by younger Quaternary alluvial fan deposits and Pleistocene Pauba Formation, both of which have produced vertebrate fossils in the past. However, there are no known paleontological resources located within the project limits. Because both the younger Quaternary alluvial fan deposits and Pleistocene Pauba Formation have yielded paleontological resources in Southern California, the area is considered paleontologically sensitive. Impacts would be less than significant with the incorporation of the following mitigation measure.

Mitigation Measure:

The following mitigation measure, from the 2007 EIR, was included in the Draft SEIR and the Final SEIR, and is applicable to the Modified Project.

- **Mitigation Measure 5.4-4A:** Prior to the issuance of a grading permit, a qualified paleontologist will be retained to supervise construction monitoring. Should any paleontological resources be uncovered, the paleontologist shall have the authority to temporarily divert grading away from exposed fossils in order to professionally and efficiently recover the fossil specimens and collect associated data. If paleontological resources are uncovered, the paleontological monitor shall file a report with the Planning Department documenting any paleontological resources that are found during the course of site grading activities. If paleontological resources are recovered they should be sent to the San Bernardino County Museum for curation.

Finding:

Changes or alterations have been required in, or incorporated into, the Modified Project that avoid or substantially lessen the significant environmental effect as identified in the Draft SEIR. These changes are identified in the form of the mitigation measure above. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project. The City of Wildomar hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

Rationale for Finding

The mitigation measure would require a qualified paleontologist to be retained to supervise construction activities prior to the issuance of grading activities, and if paleontological resources are uncovered, grading would be diverted in order to professionally and efficiently recover the fossil specimens and collect associated data. Impacts would be less than significant.

3. Hazards and Hazardous Materials

8.5(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?
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According to the Original Project, the Phase I ESA historical review determined that the project site has been used for agricultural purposes (orchard) from 1938 until as recently as 2003. While the project site is not being actively used as an orchard, the Original Project indicated that citrus production has historically utilized chlorinated herbicides and pesticides. Testing by CE Environmental on other orchard agricultural properties revealed low levels of chlorinated compounds, specifically DDT and its breakdown products, in shallow soil at concentrations below the USEPA Preliminary Remediation Goal levels (2 mg/Kg). Therefore, as with the Original Project, the Modified Project would result in less than significant impacts. During construction, there is a potential for release of petroleum products from use and storage of heavy construction equipment that could pose a hazard to the environment. A mitigation measure is included to reduce the potential for accidental release during construction. Impacts would be less than significant with mitigation incorporation.

Mitigation Measure:

The following mitigation measures, from the 2007 EIR, were included in the Draft SEIR and the Final SEIR, and are applicable to the Modified Project.

- **Mitigation Measures 5.6-1A:** Prior to commencement of grading activities, subsurface assessment in the form of trenching would be required in two areas identified as “suspected fill” near the north/central and central portions of the project site for the presence of hazardous materials. If hazardous materials are unearthed during trenching activities, hazardous materials shall be disposed of in accordance with local, state, and federal regulations.
- **Mitigation Measures 5.6-1B:** All spills or leakage of petroleum products during construction activities shall immediately be contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations regarding the cleanup and disposal of the contaminant released. The contaminated waste shall be collected and disposed of at an appropriately licensed disposal or treatment facility.

Finding:

Changes or alterations have been required in, or incorporated into, the Modified Project that avoid or substantially lessen the significant environmental effect as identified in the Draft SEIR. These changes are identified in the form of the mitigation measures above. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project. The City of Wildomar hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

Rationale for Finding

The mitigation measures would require that a subsurface assessment in the form of trenching be required in two areas identified as “suspected fill” and if hazardous materials are unearthed they shall

be disposed of in compliance with local, state, and federal regulations; and that all leakages of petroleum during construction must immediately be contained. Impacts would be less than significant.

4. Tribal Cultural Resources

8.9(aii)	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural 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 a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.
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The City notified tribes that requested to be alerted of new projects on December 10, 2020. The Rincon Band of Luiseno Indians indicated that they had no additional information to provide and did not request consultation. The Soboba Band of Mission Indians and the Pechanga Band of Luiseno Indians requested consultation.

Per AB 52, the City consulted with the Soboba Band of Luiseño Indians on January 25, 2021 and the Pechanga Band of Luiseño Indians on January 28, 2021; after reviewing the mitigation measures of the Original Project, the tribes asked for potential reburial sites to be identified in the event tribal cultural resources are discovered during construction activities. The City has identified potential reburial sites in areas that are within the project area but not subject to future development, irrigation lines, paving, flooding, or erosion, and reviewed the sites with the tribes. The proposed reburial locations have been approved by the tribes, with restrictions to preclude future development. With the following mitigation measures, impacts would be less than significant.

Mitigation Measure:

The following mitigation measures were included in the Draft SEIR and the Final SEIR, and are applicable to the Modified Project.

- **TRI-1: Inadvertent Archeological Find.** If during ground disturbance activities, unique cultural resources are discovered that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to project approval, the following procedures shall be followed. Unique cultural resources are defined, for this condition only, as being multiple artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance as determined in consultation with the Native American Tribe(s).
 - a. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the archaeologist, the tribal representative(s) and the Planning Director to discuss the significance of the find.

- b. At the meeting, the significance of the discoveries shall be discussed and after consultation with the tribal representative(s) and the archaeologist, a decision shall be made, with the concurrence of the Planning Director, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.
- c. Grading of further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal monitors if needed.
- d. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition.
- e. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the project archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.
- f. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the Planning Director for decision. The City's Planning Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe. Notwithstanding any other rights available under the law, the decision of the City Planning Director shall be appealable to the City Planning Commission and/or City Council."

■ **TRI-2: Cultural Resources Disposition.** In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:

- a. One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Wildomar Planning Department:
 - i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.
 - ii. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required

cataloging and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the City under a confidential cover and not subject to Public Records Request.

- iii. If preservation in place or reburial is not feasible then the resources shall be curated in a culturally appropriate manner at 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 City. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV monitoring report.
- **TRI-3: Archeologist Retained.** Prior to issuance of a grading permit the project applicant shall retain a Riverside County qualified Registered Professional Archaeologist (RPA), to monitor all ground disturbing activities in an effort to identify any unknown archaeological resources.

The Registered Professional Archaeologist and the Tribal monitor(s) shall manage and oversee monitoring for all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition and etc. The Registered Professional Archaeologist and the Tribal monitor(s), shall independently have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with any required special interest or tribal monitors.

The developer/permit holder shall submit a fully executed copy of the contract to the Planning Department to ensure compliance with this condition of approval. Upon verification, the Planning Department shall clear this condition.

In addition, the Registered Professional Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a Cultural Resources Management Plan (CRMP) in consultation pursuant to the definition in AB 52 to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting tribe is defined as a tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB 52 consultation process, and has completed AB 52 consultation with the City as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include:

- a. Project grading and development scheduling;
- b. The Project archaeologist and the Consulting Tribes(s) shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural

Resources Worker Sensitivity Training to those in attendance. The Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new construction personnel that will conduct earthwork or grading activities that begin work on the Project following the initial Training must take the Cultural Sensitivity Training prior to beginning work and the Project archaeologist and Consulting Tribe(s) shall make themselves available to provide the training on an as-needed basis;

- c. The protocols and stipulations that the contractor, City, Consulting Tribe(s) and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.
- **TRI-4: Native American Monitoring (Pechanga).** Tribal monitor(s) shall be required on-site during all ground-disturbing activities, including grading, stockpiling of materials, engineered fill, rock crushing, etc. The land divider/permit holder shall retain a qualified tribal monitor(s) from the Pechanga Band of Luiseno Indians. Prior to issuance of a grading permit, the developer shall submit a copy of a signed contract between the above-mentioned Tribe and the land divider/permit holder for the monitoring of the project to the Planning Department and to the Engineering Department. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist.
- **TRI-5: Native American Monitoring (Soboba).** Tribal monitor(s) shall be required on-site during all ground-disturbing activities, including grading, stockpiling of materials, engineered fill, rock crushing, etc. The land divider/permit holder shall retain a qualified tribal monitor(s) from the Soboba Band of Luiseno Indians. Prior to issuance of a grading permit, the developer shall submit a copy of a signed contract between the above-mentioned Tribe and the land divider/permit holder for the monitoring of the project to the Planning Department and to the Engineering Department. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist.
- **TRI-6: Archeology Report - Phase III and IV.** Prior to final inspection, the developer/permit holder shall prompt the Project Archeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Planning Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the Eastern Information Center

(EIC) at the University of California Riverside (UCR) and one (1) copy shall be submitted to the Consulting Tribe(s) Cultural Resources Department(s).

- **TRI-7: No-Build Easement or Similar Instrument.** In the event that Native American artifacts are found and buried within the project vicinity, a no-build easement, or similar legal instrument, shall be used to preclude future development from taking place on the reburial site(s).

Finding:

Changes or alterations have been required in, or incorporated into, the Modified Project that avoid or substantially lessen the significant environmental effect as identified in the Draft SEIR. These changes are identified in the form of the mitigation measures above. The Modified Project would not result in new or substantially more severe significant impacts compared to the Original Project. The City of Wildomar hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

Rationale for Finding

The mitigation measures, which provide procedures if unique cultural resources are discovered, provide procedures for final disposition if Native American cultural resources are discovered, require the project applicant to retain a Riverside County Qualified Registered Professional Archaeologist to monitor ground disturbing activities, require Pechanga and Soboba tribal monitors to be onsite during all ground-disturbing activities, require the submission of the Phase III and Phase IV reports to the Planning Department and Eastern Information Center, and require a no-build easement on reburial sites, would reduce impacts to less than significant.

E. Significant and Unavoidable Significant Impacts that Cannot Be Mitigated to Below the Level of Significance

No impacts were found to be significant and unavoidable in the Draft SEIR.

IV. ALTERNATIVES TO THE MODIFIED PROJECT

An EIR must briefly describe the rational for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible, and therefore, merit in-depth consideration, and which ones are infeasible.

A. Alternatives Considered and Rejected During the Scoping/Project Planning Process

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in the Draft SEIR.

1. Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would

avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines § 15126[5][B][1]). Key factors in evaluating the feasibility of potential offsite locations for EIR project alternatives include:

- If it is in the same jurisdiction.
- Whether development as proposed would require a General Plan Amendment.
- Whether the project applicant could reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). (CEQA Guidelines Section 15126.6[f][1]).

The project applicant does not own or control other comparably sized property located within the City. Because impacts of the Modified Project are related to the project's development intensity, any development of the size and type proposed by the project would have the same impacts on air quality, greenhouse gases, and transportation. Therefore, that development on an alternative project site would not reduce significant impacts of the project as proposed.

2. No Build Alternative

The No Build Alternative that was considered in the 2007 EIR assumes that development under the Modified Project would not occur, and the site would remain vacant. The No Build Alternative would not meet any of the objectives of the Modified Project and is unlikely given the location adjacent to the I-15 interchange, surrounding development, and currently approved development plans.

3. Reduced Intensity Alternative

The Original Project proposed that the project site would be developed with fewer residential units to generate less traffic and traffic-related impacts on I-15. The Original Project found that this Alternative would not substantially reduce or eliminate significant impacts of the Original Project. Similarly, a Reduced Intensity Alternative of the Modified Project would not substantially reduce or eliminate significant traffic impacts of the Modified Project as the traffic impacts of the Modified Project would be similar to the Original Project.

B. ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Because no new or substantially more severe impacts were identified for the Modified Project, the main changes from the Original Project and Modified Project is the proposed increase in dwelling units. As a result, the alternatives listed below are summarized from the Original Project and compared to the Modified Project.

1. No Project Alternative

The Original Project's No Project Alternative consists of no entitlements being provided for development of the project and assumed that the Specific Plan, Tentative Tract Map and Plot Plan, and development permits were not approved or issued. Because there were no approved plans or entitlements for the site, the No Project Alternative assumed the site would remain as an undeveloped site.

Finding:

The project site has been graded, and Phase 1 of the Specific Plan Area has already been developed. The Original Project was approved, and therefore, development of 103 single-family homes was approved for the project site. If the No Project Alternative were applied to the Modified Project, no development would take place on the project site and the effects would be the same as the Original Project. If no action were taken and the site is developed as approved, the impacts would be the same as those disclosed in the 2007 EIR for the Original Project.

2. No Project/Existing General Plan Land Uses Alternative

The 2007 EIR analyzed a No Project/Existing General Plan Land Uses Alternative that assumed the site would be developed with Light Industrial uses (industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities and supporting retail uses) in the southern portion and with uses consistent with the Community Center designation (retail commercial, office and business park uses, high density residential uses, civic uses, transit facilities, and recreational open space) in the north. However, the Light Industrial use designation lies mostly in the riparian area which would either prevent development of Light Industrial if this area were to be preserved, or would result in destruction of an open space resource with a blue line stream and a number of oak trees.

Finding:

As the Original Project was approved, the existing General Plan designation for the site is Medium High Density Residential (MHDR). Therefore, if this Alternative were to be implemented and the Modified Project was not developed, a General Plan and Specific Plan Amendment would be required to allow for the commercial and industrial uses. Because Phase 1 of the Original Project has already been developed, development of the remainder of the site with commercial and industrial uses would result in land use incompatibilities and this alternative would be infeasible. Therefore, impacts under this Alternative, when compared to the Modified Project, would be environmentally inferior.

3. Lower Density Residential Alternative

Under the Lower Density Residential Alternative, the density of the single-family portion of the Original Project would be reduced. One of the County's objectives for the site is to provide additional types of housing choices to this area within easy access to major transportation corridors. This Alternative included:

- Approximately 14 acres of open space
- Approximately 36 acres developed as single-family and multifamily homes at an average of 9.5 units per acre, for a total of 312 multifamily dwelling units at 14.9 du/ac and 51 single-family dwelling units on 5,400-square-foot lots with an average density of 4 du/ac
- A total population of 862 persons.

This Alternative would provide up to 363 dwelling units which might meet some housing needs for these residences. However, in general it would not meet the existing need for housing in the area and therefore would not meet all the objectives of the Original Project (312 multifamily dwelling units and

103 single-family units with associated recreational areas). When the lot sizes are increased for single-family residential uses, there would not be as much land for community recreational areas. Additionally, it would not provide the highest and best use for the area as envisioned in the General Plan—which provides for high and very high-density residential uses next to transportation corridors—and would therefore not be as compatible with the General Plan.

Finding:

The Modified Project would replace the 103 single-family units originally proposed under the Original Project with 288 multifamily dwelling units. If this Alternative were applied to the Modified Project, approximately 143 multifamily dwelling units would be developed instead of 288 dwelling units. The analysis of this Alternative in comparison to the Modified Project would result in similar impacts as analyzed above, and would be considered generally superior to the Modified Project.

V. FINDINGS ON RESPONSES TO COMMENTS ON THE DRAFT SEIR AND REVISIONS TO THE FINAL SEIR

The Final SEIR contains response to comments, revisions, clarifications, and corrections to the Draft SEIR. The focus of the response to comments is on the disposition of significant environmental issues as raised in the comments, as specified by State CEQA Guidelines Section 15088(b). The City provided written responses to each comment made by a public agency, as set forth in Section 2 of the Final SEIR, pursuant to State CEQA Guidelines Section 15088(b).

City staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the Draft SEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Draft SEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5 of the CEQA Guidelines.

July 2021 | Final Supplemental Environmental Impact Report
State Clearinghouse No. 2004071076

OAK SPRINGS RANCH PHASE 2 PROJECT: REVISED PLOT PLAN FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (PA 20-0044)

City of Wildomar

Prepared for:

City of Wildomar

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Appendix

Appendix 1 Fuscoe Memo

1. Introduction

1.1 INTRODUCTION

This Final Supplemental Environmental Impact Report (Final SEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations §§ 15000 et seq.).

According to the CEQA Guidelines, Section 15132, the Final SEIR shall consist of:

- (a) The Draft Supplemental Environmental Impact Report (Draft SEIR) or a revision of the Draft;
- (b) Comments and recommendations received on the Draft SEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the Draft SEIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the Draft SEIR for the Oak Springs Ranch Phase 2 Project during the public review period, which began April 21, 2021, and closed June 4, 2021. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated Draft SEIR comprise the Final SEIR, in accordance with CEQA Guidelines, Section 15132.

1.2 FORMAT OF THE FINAL SEIR

This document is organized as follows:

Section 1, Introduction. This section describes CEQA requirements and content of this Final SEIR.

Section 2, Response to Comments. This section provides a list of agencies and interested persons commenting on the Draft SEIR; copies of comment letters received during the public review period, and individual responses to written comments. Individual comments for each letter have been numbered, and the letter is followed by responses with references to the corresponding comment number.

Section 3. Revisions to the Draft SEIR. This section contains revisions to the Draft SEIR text and figures as a result of the comments received by agencies and interested persons as described in Section 2, and/or required text revisions discovered after release of the Draft SEIR for public review.

1. Introduction

The responses to comments contain material and revisions that will be added to the text of the Final SEIR. City of Wildomar staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the Draft SEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Draft SEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of Draft SEIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this Final SEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on Draft SEIRs.

2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Wildomar) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft SEIR and prepare written responses.

This section provides all written responses received on the Draft SEIR and the City of Wildomar's responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the Draft SEIR are excerpted in this document, the sections are shown indented. Changes to the Draft SEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the Draft SEIR during the public review period.

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
A	Keven and Nicole Steen	April 21, 2021	2-3
B	Rincon Band of Luiseño Indians, Cheryl Madrigal, Tribal Historic Preservation Officer/Cultural Resources Manager	May 12, 2021	2-7
C	Mitchell M. Tsai (on behalf of Southwest Regional Council of Carpenters)	June 4, 2021	2-11

2. Response to Comments

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2. Response to Comments

LETTER A – Keven and Nicole Steen (1 page)

From: [REDACTED]
To: Matthew Bassi
Subject: Oak Springs Ranch Phase 2 - Revised Plan
Date: Tuesday, April 20, 2021 7:30:35 PM

Mr. Bassi,

While I am not really on board with more apartments in this city. I see that this is already in the making. If, and my family prefers low growth in this community, there is going to be more apartments added; Please, please make them have more parking per unit available to the residents. The existing oak springs apartments already spill over onto Wildomar Trail back behind the Albertsons Shopping center and make that area very compact and full. Any further apartment builds should give at least 3 or more available parking spaces. (More than just one spot outside each units garage space)

For growth Going forward, My family and most of my neighbors prefer slow growth. More rural areas.

Keven & Nicole Steen

Wildomar, CA 92595

A-1

2. Response to Comments

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2. Response to Comments

A. Response to Comments from Keven and Nicole Steen, dated April 21, 2021.

A-1 The commenters state that they prefer slow growth, and state that the City should ensure that there are more parking spaces per unit for the Project. The commenters state that the existing Oak Springs Ranch apartments spill onto Wildomar Trail.

Parking is not a CEQA issue. The comment does not describe any inadequacies in the CEQA analysis or conclusion in the Draft SEIR, therefore no changes to the Draft SEIR are necessary. However, the Modified Project would be required to comply with the parking regulations as set forth by the City. As analyzed in Chapter 5.8, *Transportation*, of the Draft SEIR, all transportation impacts would be less than significant, and the Modified Project would not worsen traffic or circulation in the project area.

2. Response to Comments

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2. Response to Comments

LETTER B – Rincon Band of Luiseño Indians, Cheryl Madrigal, Tribal Historic Preservation Officer, Cultural Resources Manager (1 page)

Rincon Band of Luiseño Indians

CULTURAL RESOURCES DEPARTMENT

One Government Center Lane | Valley Center | CA 92082
(760) 749-1051 | Fax: (760) 749-8901 | rincon-nsn.gov



May 12, 2021

Sent via email: mbassi@cityofwildomar.org
City of Wildomar
Matthew C. Bassi
23873 Clinton Keith Road, Suite 201
Wildomar, CA 92595

Re: Oak Springs Ranch Phase II Plot Plan Revision

Dear Mr. Bassi,

This letter is written on behalf of the Rincon Band of Luiseño Indians (“Rincon Band” or “Band”), a federally recognized Indian Tribe and sovereign government. Thank you for providing us with the Notice of Availability of a Draft Supplemental Environmental Impact Report for the above referenced project. The identified location is within the Territory of the Luiseño people, and is also within Rincon’s specific area of Historic interest.

We have reviewed the provided documents and have no further comments at this time. We understand that other Tribes potentially have knowledge particular to this project site and may request additional measures. Please note that the Rincon Band supports all efforts to completely avoid cultural resources as preferred mitigation.

B-1

We do request that the Rincon Band be notified of any changes in project plans. In addition, we request a copy of the final monitoring report, when available.

If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 297-2635. Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Cheryl Madrigal
Tribal Historic Preservation Officer
Cultural Resources Manager

Bo Mazzetti
Chairman

Tishmall Turner
Vice Chair

Laurie E. Gonzalez
Council Member

John Constantino
Council Member

Joseph Linton
Council Member

2. Response to Comments

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2. Response to Comments

B. Response to Comments from Rincon Band of Luiseño Indians, Cheryl Madrigal, Tribal Historic Preservation Officer, Cultural Resources Manager, dated May 12, 2021.

B-1 The commenter states that the Rincon Band of Luiseño Indians have reviewed the document and have no further comments or concerns regarding the Modified Project. The commenter asks that the tribe be notified if the project plans change, and requests a copy of the final mitigation monitoring and reporting program.

The City thanks the Tribe for their response and will inform the tribe of any project changes.

2. Response to Comments

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2. Response to Comments

LETTER C— Mitchell M. Tsai (on behalf of Southwest Regional Council of Carpenters) (53 pages)

P: (626) 381-9248
F: (626) 389-5414
E: info@mitchtsailaw.com



155 South El Molino Avenue
Suite 104
Pasadena, California 91101

VIA U.S. MAIL & E-MAIL

June 4, 2021

Matthew Bassi, Planning Director
City of Wildomar
23873 Clinton Keith Road, Suite 201
Wildomar, California 92595
Email: mbassi@cityofwildomar.org

RE: Oak Springs Ranch Phase 2 Project

Dear Mr. Bassi,

On behalf of the Southwest Regional Council of Carpenters (“**Commenter**” or “**Carpenter**”), my Office is submitting these comments on the City of Wildomar’s (“**City**” or “**Lead Agency**”) Draft Supplemental Environmental Impact Report (“**DSEIR**”) (SCH No. 2020120325) for the Oak Springs Ranch Phase 2 Project: Revised Plot Plan, which includes the construction of a 288-unit multifamily apartment complex with nine residential buildings and one amenity building located on approximately 12.89 acres in Wildomar, California (“**Project**”).

The original Oak Springs Ranch Specific Plan Project (“**Original Project**”) was approved in 2007 after the Environmental Impact Report for the Original Project (“**2007 EIR**”) was certified by the Riverside County. The approved Original Project allowed for the development of 312 multifamily dwelling units in Planning Area 1 (which were constructed in 2014 and are now occupied) and 103 single-family units in Planning Area 2. Planning Area 2 was not constructed as planned. The DSEIR evaluates Applicant’s request to construct 312 multifamily units in Planning Area 2 rather than the 103 single-family units originally approved.

C-1

The Southwest Carpenters is a labor union representing 50,000 union carpenters in six states and has a strong interest in well ordered land use planning and addressing the environmental impacts of development projects.

2. Response to Comments

City of Wildomar - Oak Springs Ranch Phase 2 Project
June 4, 2021
Page 2 of 18

Individual members of the Southwest Carpenters live, work and recreate in the City and surrounding communities and would be directly affected by the Project's environmental impacts.

Commenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Commenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

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CONT'D

Commenters incorporates by reference all comments raising issues regarding the EIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected to the Project's environmental documentation may assert any issue timely raised by other parties).

Moreover, Commenter requests that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act ("CEQA"), Cal Public Resources Code ("PRC") § 21000 *et seq.*, and the California Planning and Zoning Law ("Planning and Zoning Law"), Cal. Gov't Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

The City should require the Applicant provide additional community benefits such as requiring local hire and use of a skilled and trained workforce to build the Project. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training

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program or who are registered apprentices in an apprenticeship training program approved by the State of California.

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CONT'D

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

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[A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

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... labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California's workforce can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.¹

Local skilled and trained workforce requirements and policies have significant environmental benefits since they improve an area's jobs-housing balance, decreasing the amount of and length of job commutes and their associated

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¹ California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, available at <https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf>

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greenhouse gas emissions. Recently, on May 7, 2021, the South Coast Air Quality Management District found that the “[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component” can result in air pollutant reductions.²

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CONT'D

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.³

C-6

In addition, local hire mandates as well as skill training are critical facets of a strategy to reduce vehicle miles traveled. As planning experts Robert Cervero and Michael Duncan noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.⁴ Some municipalities have tied local hire and skilled and trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing.” The city’s First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is

² South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, available at <http://www.aqmd.gov/docs/default-source/Agendas/Governing%20Board/2021/2021-May7-027.pdf?sfvrsn=10>

³ California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, available at <https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf>

⁴ Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, available at <http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf>.

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voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.⁵

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The City should also require the Project to be built to standards exceeding the current 2019 California Green Building Code to mitigate the Project's environmental impacts and to advance progress towards the State of California's environmental goals.

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I. EXPERTS

This comment letter includes comments from a scientific and technical expert Bryan Estrada, AICP, PTP, (“**Mr. Estrada**”) concerning the DEIR. His comments and CV are attached hereto and are incorporated herein by reference (Exhibits D and E, respectively).

Since 2007, Mr. Estrada has gained experience in the many aspects of Transportation and Environmental Planning while working with RK Engineering Group. He is an active member of the American Planning Association (APA) and the Association of Environmental Professionals (AEP), and stays up to date on the latest trends and topics concerning CEQA policy. He is frequently engaged with local government agencies, community groups, and developers to help to craft innovative solutions to mitigate traffic, noise and air quality impacts throughout the community.

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Mr. Estrada's experience includes traffic/transportation planning, air quality and greenhouse gas analysis, and environmental acoustics/noise analysis. He has also contributed to the design and construction of traffic signal plans, signing and striping plans and traffic control plans. He is regularly out in the field performing assessments and inventories of project sites and meeting with community stakeholders. Mr. Estrada works on transportation and environmental planning projects that range from focused site-specific technical studies to regional and General Plan level analyses. His recent work includes Mixed Use Development projects in Downtown Huntington Beach, the City of Aliso Viejo General Plan Update and Aliso Viejo Town Center Vision Plan, Eleanor Roosevelt High School eStem Academy Traffic Impact Study and On-Site Circulation Plan (Eastvale, CA), Great Wolf Lodge Resort (Garden Grove, CA), Starbucks Coffee Shops (multiple locations through Southern California), Paradise

⁵ *Id.*

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Knolls Specific Plan (Jurupa Valley, CA), Vista Del Agua Specific Plan (Coachella, CA), and Monterey Park Hotel Mixed Use Development Project (Monterey Park, CA).

Mr. Estrada has obtained the American Institute of Certified Planners (AICP) certification granted by the American Planning Association and the Professional Transportation Planner (PTP) certification granted by the Transportation Professional Certification Board.

II. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

A. Background Concerning the California Environmental Quality Act

CEQA has two basic purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 California Code of Regulations (“CCR” or “CEQA Guidelines”) § 15002(a)(1).⁶ “Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR ‘protects not only the environment but also informed self-government.’ [Citation.]” *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564. The EIR has been described as “an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.” *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm’rs.* (2001) 91 Cal. App. 4th 1344, 1354 (“Berkeley Jets”); *County of Inyo v. Yorty* (1973) 32 Cal. App. 3d 795, 810.

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. CEQA Guidelines § 15002(a)(2) and (3). *See also, Berkeley Jets*, 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553; *Laurel Heights Improvement Ass’n v. Regents of the University of California* (1988) 47 Cal. 3d 376, 400. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to “identify ways that

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⁶ The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, section 15000 *et seq.*, are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. (Cal. Pub. Res. Code § 21083.) The CEQA Guidelines are given “great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous.” *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal. 4th 204, 217.

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environmental damage can be avoided or significantly reduced.” CEQA Guidelines § 15002(a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns” specified in CEQA section 21081. CEQA Guidelines § 15092(b)(2)(A–B).

While the courts review an EIR using an “abuse of discretion” standard, “the reviewing court is not to ‘uncritically rely on every study or analysis presented by a project proponent in support of its position.’ A ‘clearly inadequate or unsupported study is entitled to no judicial deference.’” *Berkeley Jets*, 91 Cal. App. 4th 1344, 1355 (emphasis added) (quoting *Laurel Heights*, 47 Cal. 3d at 391, 409 fn. 12). Drawing this line and determining whether the EIR complies with CEQA’s information disclosure requirements presents a question of law subject to independent review by the courts. *Sierra Club v. Cnty. of Fresno* (2018) 6 Cal. 5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal. App. 4th 48, 102, 131. As the court stated in *Berkeley Jets*, 91 Cal. App. 4th at 1355:

A prejudicial abuse of discretion occurs “if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process.

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR’s function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Communities for a Better Environment v. Richmond* (2010) 184 Cal. App. 4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449–450).

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B. CEQA Requires Revision and Recirculation of an Environmental Impact Report When Substantial Changes or New Information Comes to Light

Section 21092.1 of the California Public Resources Code requires that “[w]hen significant new information is added to an environmental impact report after notice has been given pursuant to Section 21092 … but prior to certification, the public agency shall give notice again pursuant to Section 21092, and consult again pursuant to Sections 21104 and 21153 before certifying the environmental impact report” in order to give the public a chance to review and comment upon the information. CEQA Guidelines § 15088.5.

Significant new information includes “changes in the project or environmental setting as well as additional data or other information” that “deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative).” CEQA Guidelines § 15088.5(a). Examples of significant new information requiring recirculation include “new significant environmental impacts from the project or from a new mitigation measure,” “substantial increase in the severity of an environmental impact,” “feasible project alternative or mitigation measure considerably different from others previously analyzed” as well as when “the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.” *Id.*

An agency has an obligation to recirculate an environmental impact report for public notice and comment due to “significant new information” regardless of whether the agency opts to include it in a project’s environmental impact report. *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal. App. 4th 74, 95 [finding that in light of a new expert report disclosing potentially significant impacts to groundwater supply “the EIR should have been revised and recirculated for purposes of informing the public and governmental agencies of the volume of groundwater at risk and to allow the public and governmental agencies to respond to such information.”]. If significant new information was brought to the attention of an agency prior to certification, an agency is required to revise and recirculate that information as part of the environmental impact report.

For all the reasons outlined below, the SDEIR needs to be revised and recirculated to provide the public adequate opportunity to review and comment on the Project’s actual air quality, greenhouse gas, and noise effects. Failure to do so would deprive the

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public of meaningful opportunity to evaluate and comment on the Project's adverse environmental effects and feasible ways to mitigate them. *See* CEQA Guidelines § 15088.5(a).

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C. The DSEIR Fails to Sufficiently Disclose, Analyze, and Mitigate the Project's Significant Air Quality Impacts

The 2007 EIR found the Original Project would exceed applicable emission thresholds during site preparation and construction activities even with incorporation of Mitigation Measures, which constituted a significant and unavoidable air quality impact. However, the DSEIR explains, "Since Certification of the 2007 EIR, mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project." DSEIR p. 5.2-26. The DSIER's modeling of the Project's emissions show the Project, without mitigation, would exceed the applicable emission threshold for nitrogen oxides. But with the application of new Mitigation Measure AQ-1, the Project's nitrogen oxide emissions would be contained to levels below the applicable threshold and the Project would, consequently, have less-than-significant air quality impacts. However, as noted below, the DSEIR's air quality analysis is undermined by incomplete and unsubstantiated calculations and inaccurate and inadequate mitigation measures.

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Attached hereto and incorporated herein is a letter from Mr. Estrada, an air quality and greenhouse gas expert with RK Engineering Group, Inc. (Exhibit D). In it Mr. Estrada describes how the DSEIR fails to disclose all potential air quality impacts of the Project and sufficiently analyze measures to mitigate those impacts. Some of Mr. Estrada's findings are summarized below.

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According to Mr. Estrada, the City made numerous adjustments to the air emission modeling software's (CalEEMod) default assumptions that resulted in lower emission estimates than what would typically occur when using the default modeling assumptions. Impermissibly, those changes were not supported by substantial evidence or justified by enforceable control measures.

Additionally, Mr. Estrada notes that the Mitigation Measure AQ-1, upon which the DSEIR relies to conclude the Project's nitrogen oxide emissions would be reduced to levels below applicable thresholds, is inaccurate and self-contradicting. Of particular importance is that AQ-1 would allow for more than double the daily soil haul trips

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than were assumed during air emissions modeling, potentially allowing for significantly more emissions than modeled and the exceedance of emission thresholds.

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Lastly, Mr. Estrada explains the DSEIR fails to quantitatively evaluate the Project's potential to pose health risks to sensitive receptors located less than 25 meters from the construction area and that the Project should, therefore, be presumed to cause significant health impacts. Consequently, the City should require implementation of mitigation measures to reduce health risks to the maximum extent possible.

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In total, the DSEIR fails to substantiate its calculations of the Project's potential emissions, relies on a flawed mitigation measure to avoid a finding of significant air impacts, and neglects to sufficiently evaluate and mitigate the health risks posed by the Project. These inaccuracies and inadequacies undermine the DSEIR's conclusions concerning the Project's air quality impacts. The DSEIR's must be revised and recirculated with an accurate and complete air quality analysis.

D. The DSEIR Fails to Sufficiently Disclose, Analyze, and Mitigate the Project's Greenhouse Gas Emissions

Like the DSEIR's analysis of air quality impacts, the DSEIR's analysis of greenhouse gas ("GHG") emissions is undermined by unsubstantiated emission modeling inputs and the failure to consider relevant information. As reflected in Exhibit D, Mr.

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Estrada's evaluation of the DSEIR's GHG analysis revealed that emission modeling default assumption that affect GHG estimates were adjusted without explanation or sufficient justification and the DSEIR failed to include a discussion of the 2019 California Green Building Code. These issues must be addressed in a revised and recirculated DSEIR.

E. The DSEIR Fails to Disclose, Analyze, and Mitigate the Project's Significant Noise Impacts

The DSEIR's fails entirely to disclose, analyze, or mitigate the Project's construction and operational noise impacts on the occupants of the 312 multifamily dwelling units constructed as part of the Original Project in 2014 on Planning Area 1, despite those occupants presence immediately adjoined to the Project's future construction site on Planning Area 2. DSEIR Figure 1-2, included below, reflects the proximity of Phase 1's now-occupied multifamily housing units to Planning Area 2, where ten buildings would be constructed under the Project.

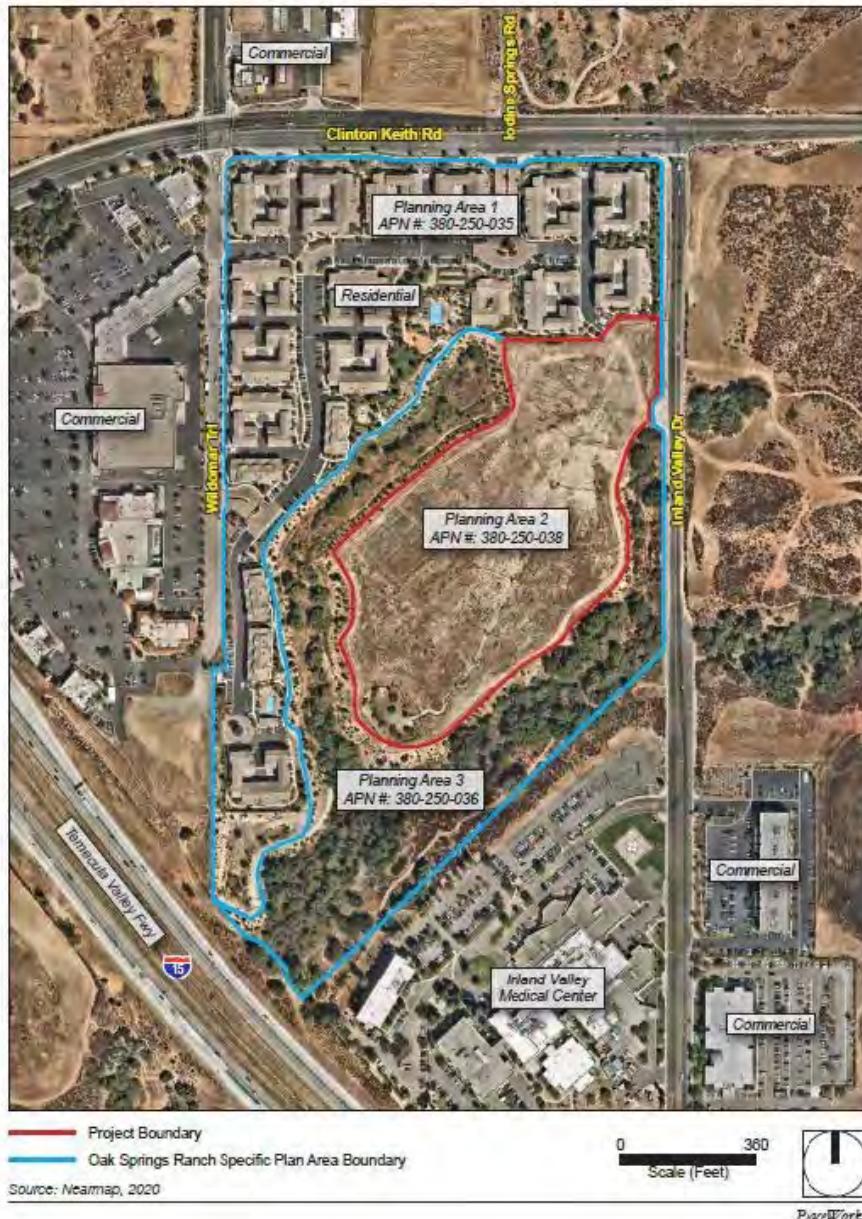
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OAKS SPRINGS RANCH PHASE 2 PROJECT: REVISED PLOT PLAN DRAFT SUPPLEMENTAL EIR (PA20-044)
CITY OF WILDOMAR

Figure 1-2 - Aerial Photograph



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Unfortunately, the DSEIR's omission of information concerning the noise impacts these residents would face and the availability of measures to mitigate those impact was not an accident. It was intentional. The DSEIR coolly rationalizes its deliberate ignorance of noise impacts to those residents as follows:

While Phase I of this project resulted in the construction of apartments that are now occupied, because they were part of the original project, they are not considered new sensitive receptors. CEQA only requires an analysis of a project's impact on the environment and not the environment's impact on a project. (Parker Shattuck Neighbors v. Berkeley City Council (2013) 222 Cal.App.4th 768.) In this case, buildout of the project includes Phase I and Phase II. The effect of construction noise from construction of Phase II on Phase I is not an impact of the project on the environment but rather, an impact of the project on itself, which does not constitute an environmental impact pursuant to CEQA. Therefore, the Phase I residents are not considered sensitive receptors for purposes of this analysis.

DSEIR p. 5.5-15. For the reasons described below, this explanation is both unnecessarily insensitive and legally incorrect.

By excluding the sensitive receptors in Planning Area 1 from its noise analysis, the DSEIR avoids acknowledging the Project will likely result in significantly adverse noise impacts to those residents and, consequently, sidesteps the Applicant's obligation to mitigate those impacts to the extent possible. *See* CEQA Guidelines § 15092(b)(2)(A) (explaining if a project has a significant effect on the environment, an agency may approve that project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible").

When the 2007 EIR evaluated the Original Project's potential noise impacts, it determined the closest sensitive receptor was a residence 367 feet from the northern boundary of the Original Project. 2007 EIR p. 5.9-23. At that distance, the 2007 EIR concluded, that residence would experience significant impacts due to construction noise that could only be reduced to less-than-significant levels with the inclusion of mitigation measures. 2007 EIR p. 5.9-28. As described in the 2007 EIR, both construction phases of the Original Project were expected to be completed within 18 to 24 months of the Original Project's approval. 2007 EIR p. 3-13. Completing the Project as described in the 2007 EIR probably would have avoided any noise impacts

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to residents of either phase of the development, as the noisiest aspects of construction could have been completed prior to occupancy of any residential buildings.

Here, rather than acknowledge the residents of Planning Area 1 are sensitive receptors currently living within 100 feet of the Project's Planning Area 2 construction site, the DSEIR retains the 2007 EIR's residence of reference, which it notes is 830 feet north of the Project's construction site. DSEIR p. 5.5-15. If at 367 feet the Original Project would have caused significant noise impacts that needed to be mitigated, it certainly follows that the Project would cause significant noise impacts to residents located less than 100 feet away. Those impacts should be evaluated in detail, disclosed to the public, and mitigated to the maximum extent feasible. The DSEIR's express use of an outdated and unhelpful reference point at the expense of the adjacent residents who will in fact bear the noise burdens the Project is insensitive.

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The DSEIR hides behind a strict reading of "project" as defined by CEQA, stretching the Original Project's description and timeline across more than a decade and many changed circumstances to avoid fully addressing Phase 2's effects on Phase 1's residents. Commenter notes that DSEIR does not apply this same strict approach throughout its impact analyses. For example, the DSEIR's air quality analysis expressly evaluated Phase 2's construction emissions on Phase 1's residents. See DSEIR p. 5.2-28 ("Since certification of the 2007 EIR, Phase 1 of the Original Project in Planning Area 1 has already been built and the area has had significant development. Therefore, the LST analysis for the Modified Project considers these changes and has been updated based on the distance to the nearest sensitive receptor, which would be the Planning Area 1 residences immediately north of the Modified Project site"). This inconsistency reveals the acceptability and importance of considering under CEQA the impacts of the Project on Phase 1 residents.

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Contrary to the DSEIR's justification for ignoring impacts to the Original Project's residents currently residing in Planning Area 1, it is appropriate and often necessary to consider effects to projects residents and users. As the California Supreme Court explained in *California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 388, although CEQA does not proscribe consideration of the effects of the environment on a project, nor "does CEQA prohibit an agency from considering—as part of an environmental review for a project it proposes to undertake—how existing conditions might impact a project's future users or residents. Indeed, it appears that such an analysis had been widely understood to be an integral

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aspect of CEQA review for three decades.” Through its General Plan Noise Element and other exercises of its police powers, the City has done exactly that—established criteria applicable through CEQA for the purpose of protecting all residents, including existing and future users of a CEQA “project”, from excessive noise impacts. See *California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2016) 2 Cal.App.5th 1067.

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Lastly, notwithstanding CEQA, the City is obligated by state law to ensure any zoning action it takes to approve the construction of Phase 2 is consistent with the City’s General Plan and associated programs, including the City’s General Plan Noise Element. State law requires all zoning ordinances and other land use decisions be consistent with the general plan. *See Gov. Code § 65860(a)(2) [land uses authorized by zoning ordinance must be “compatible with the objectives, policies, general land uses, and programs specified in the [general] plan.”]; see also Neighborhood Action Group v. County of Calaveras* (1984) 156 Cal.App.3d 1176, 1184. Note that state zoning law does not incorporate CEQA’s distinction between impacts of a project on the environment and impacts of the environment on the Project. Consistency determinations require consideration of both.

Here, the Applicant has requested modifications to the Original Project that must be approved by the City through a General Plan Amendment, a Specific Plan Amendment, a Zoning Ordinance Amendment, and other discretionary land use decisions. DSEIR § 3.1.2. The City is obligated to evaluate whether granting those amendments would be consistent with the City’s General Plan’s Noise Element goals and policies, including Policy N-12.1: “Minimize the impacts of construction noise on adjacent uses within acceptable practices” and Policy N-12.2: “Ensure that construction activities are regulated to establish house of operation in order to prevent and/or mitigate the generation of excessive or adverse noise impacts on surrounding areas.” *See DSEIR p. 5.5-7.* Despite introducing these and other Noise Element policies, the DSEIR fails to provide any information regarding the Project’s noise impacts on Planning Area 1’s residents and whether approving those impacts through zoning actions are inconsistent with the Noise Element.

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In total, the DSEIR impermissible neglects its obligation under both CEQA and the state’s land use law to evaluate the Project’s noise impacts to residents of Planning Area 1.

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F. Due to the COVID-19 Crisis, the City Must Adopt a Mandatory Finding of Significance that the Project May Cause a Substantial Adverse Effect on Human Beings and Mitigate COVID-19 Impacts

CEQA requires that an agency make a finding of significance when a Project may cause a significant adverse effect on human beings. PRC § 21083(b)(3); CEQA Guidelines § 15065(a)(4).

Public health risks related to construction work requires a mandatory finding of significance under CEQA. Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.⁷

SWRCC recommends that the Lead Agency adopt additional CEQA mitigation measures to mitigate public health risks from the Project's construction activities. SWRCC requests that the Lead Agency require safe on-site construction work practices as well as training and certification for any construction workers on the Project Site.

In particular, based upon SWRCC's experience with safe construction site work practices, SWRCC recommends that the Lead Agency require that while construction activities are being conducted at the Project Site:

Construction Site Design:

- The Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.
- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.

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⁷ Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, available at <https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx>.

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- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

Testing Procedures:

- The temperature screening being used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the Project Site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]
- After 7:30 am only the main gate entrance [ZONE 1] will continue to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.

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- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

Planning

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.⁸

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The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The Agency should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

⁸ See also The Center for Construction Research and Training, North America's Building Trades Unions (April 27 2020) NABTU and CPWR COVID 19 Standards for U.S. Construction Sites, available at https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf. Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, available at https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf.

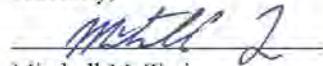
2. Response to Comments

City of Wildomar - Oak Springs Ranch Phase 2 Project
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III. CONCLUSION

Commenters request that the City revise and recirculate the Project's environmental impact report to address the aforementioned concerns. If the City has any questions or concerns, feel free to contact my Office. C-23

Sincerely,



Mitchell M. Tsai

Attorneys for Southwest Regional Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B);

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C)

May 3, 2021 RK Engineering Group, Inc. Letter to Mitchell M. Tsai re Oak Springs Phase 2 Project (Exhibit D); and

Air Quality and GHG Expert Bryan Estrada CV (Exhibit E).

2. Response to Comments

EXHIBIT A

2. Response to Comments



Technical Consultation, Data Analysis and
Litigation Support for the Environment

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Paul E. Rosenfeld, PhD
(310) 795-2335
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March 8, 2021

Mitchell M. Tsai
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

Soil Water Air Protection Enterprise ("SWAPE") is pleased to provide the following draft technical report explaining the significance of worker trips required for construction of land use development projects with respect to the estimation of greenhouse gas ("GHG") emissions. The report will also discuss the potential for local hire requirements to reduce the length of worker trips, and consequently, reduced or mitigate the potential GHG impacts.

Worker Trips and Greenhouse Gas Calculations

The California Emissions Estimator Model ("CalEEMod") is a "statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects."¹ CalEEMod quantifies construction-related emissions associated with land use projects resulting from off-road construction equipment; on-road mobile equipment associated with workers, vendors, and hauling; fugitive dust associated with grading, demolition, truck loading, and on-road vehicles traveling along paved and unpaved roads; and architectural coating activities; and paving.²

The number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.³

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¹ "California Emissions Estimator Model." CAPCOA, 2017, available at: <http://www.aqmd.gov/caleemod/home>.

² "California Emissions Estimator Model." CAPCOA, 2017, available at: <http://www.aqmd.gov/caleemod/home>.

³ "CalEEMod User's Guide." CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

2. Response to Comments

Specifically, the number and length of vehicle trips is utilized to estimate the vehicle miles travelled (“VMT”) associated with construction. Then, utilizing vehicle-class specific EMFAC 2014 emission factors, CalEEMod calculates the vehicle exhaust, evaporative, and dust emissions resulting from construction-related VMT, including personal vehicles for worker commuting.⁴

Specifically, in order to calculate VMT, CalEEMod multiplies the average daily trip rate by the average overall trip length (see excerpt below):

$$\text{“VMT}_d = \sum(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$$

Where:

n = Number of land uses being modeled.⁵

Furthermore, to calculate the on-road emissions associated with worker trips, CalEEMod utilizes the following equation (see excerpt below):

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$$\text{“Emissions}_{\text{pollutant}} = \text{VMT} * \text{EF}_{\text{running,pollutant}}$$

Where:

$\text{Emissions}_{\text{pollutant}}$ = emissions from vehicle running for each pollutant

VMT = vehicle miles traveled

$\text{EF}_{\text{running,pollutant}}$ = emission factor for running emissions.⁶

Thus, there is a direct relationship between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. In other words, when the trip length is increased, the VMT and vehicle running emissions increase as a result. Thus, vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise.

Default Worker Trip Parameters and Potential Local Hire Requirements

As previously discussed, the number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.⁷ In order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations, it is important to consider the CalEEMod default worker trip parameters. CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act (“CEQA”) requires that such changes be justified by substantial evidence.⁸ The default number of construction-related worker trips is calculated by multiplying the

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⁴ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.agmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.

⁵ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.agmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.

⁶ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.agmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.

⁷ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: http://www.agmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

⁸ CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 1, 9.

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number of pieces of equipment for all phases by 1.25, with the exception of worker trips required for the building construction and architectural coating phases.⁹ Furthermore, the worker trip vehicle class is a 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2, respectively.¹⁰ Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.¹¹ The operational home-to-work vehicle trip lengths are:

“[B]ased on the location and urbanization selected on the project characteristic screen. These values were supplied by the air districts or use a default average for the state. Each district (or county) also assigns trip lengths for urban and rural settings” (emphasis added).¹²

Thus, the default worker trip length is based on the location and urbanization level selected by the User when modeling emissions. The below table shows the CalEEMod default rural and urban worker trip lengths by air basin (see excerpt below and Attachment A).¹³

Worker Trip Length by Air Basin		
Air Basin	Rural (miles)	Urban (miles)
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	16.47	11.17
Minimum	10.80	10.80
Maximum	19.80	14.70
Range	9.00	3.90

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⁹ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

¹⁰ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.

¹¹ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.

¹² “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.

¹³ “Appendix D Default Data Tables.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

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As demonstrated above, default rural worker trip lengths for air basins in California vary from 10.8- to 19.8-miles, with an average of 16.47 miles. Furthermore, default urban worker trip lengths vary from 10.8- to 14.7-miles, with an average of 11.17 miles. Thus, while default worker trip lengths vary by location, default urban worker trip lengths tend to be shorter in length. Based on these trends evident in the CalEEMod default worker trip lengths, we can reasonably assume that the efficacy of a local hire requirement is especially dependent upon the urbanization of the project site, as well as the project location.

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Practical Application of a Local Hire Requirement and Associated Impact

To provide an example of the potential impact of a local hire provision on construction-related GHG emissions, we estimated the significance of a local hire provision for the Village South Specific Plan ("Project") located in the City of Claremont ("City"). The Project proposed to construct 1,000 residential units, 100,000-SF of retail space, 45,000-SF of office space, as well as a 50-room hotel, on the 24-acre site. The Project location is classified as Urban and lies within the Los Angeles-South Coast County. As a result, the Project has a default worker trip length of 14.7 miles.¹⁴ In an effort to evaluate the potential for a local hire provision to reduce the Project's construction-related GHG emissions, we prepared an updated model, reducing all worker trip lengths to 10 miles (see Attachment B). Our analysis estimates that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with Project construction would decrease by approximately 17% (see table below and Attachment C).

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO ₂ e)	3,623
Amortized Construction GHG Emissions (MT CO ₂ e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO ₂ e)	3,024
Amortized Construction GHG Emissions (MT CO ₂ e/year)	100.80
% Decrease in Construction-related GHG Emissions	
	17%

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As demonstrated above, by implementing a local hire provision requiring 10 mile worker trip lengths, the Project could reduce potential GHG emissions associated with construction worker trips. More broadly, any local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects. As previously described, the significance of a local hire requirement depends on the worker trip length enforced and the default worker trip length for the project's urbanization level and location.

¹⁴ "Appendix D Default Data Tables." CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-85.

2. Response to Comments

Disclaimer

SWAPE has received limited discovery. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

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Sincerely,



Matt Hagemann, P.G., C.Hg.



Paul E. Rosenfeld, Ph.D.

2. Response to Comments

EXHIBIT B

2. Response to Comments



Technical Consultation, Data Analysis and
Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE

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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.

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2. Response to Comments

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H₂O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

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Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

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CONT'D

2. Response to Comments

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association.* Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants.* Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum.* Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable.* Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost. *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association.* Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association.* Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association.* Lecture conducted from Vancouver Washington.

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference.* Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association.* Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings.* Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America.* Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

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CONT'D

2. Response to Comments

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

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Academic Grants Awarded:

California Integrated Waste Management Board. \$41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: \$10,000 grant awarded to San Diego State University. Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. \$100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. \$20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: \$10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: \$15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. \$500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

2. Response to Comments

Deposition and/or Trial Testimony:

In the United States District Court For The District of New Jersey

Duarte et al, *Plaintiffs*, vs. United States Metals Refining Company et. al. *Defendant*.

Case No.: 2:17-cv-01624-ES-SCM

Rosenfeld Deposition. 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division

M/T Carla Maersk, *Plaintiffs*, vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" *Defendant*.

Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237

Rosenfeld Deposition. 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica

Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants

Case No.: No. BC615636

Rosenfeld Deposition, 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica

The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants

Case No.: No. BC646857

Rosenfeld Deposition, 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado

Bells et al. Plaintiff vs. The 3M Company et al., Defendants

Case: No 1:16-cv-02531-RBJ

Rosenfeld Deposition, 3-15-2018 and 4-3-2018

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In The District Court Of Regan County, Texas, 112th Judicial District

Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants

Cause No 1923

Rosenfeld Deposition, 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa

Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants

Cause No C12-01481

Rosenfeld Deposition, 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois

Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants

Case No.: No. 0i9-L-2295

Rosenfeld Deposition, 8-23-2017

In The Superior Court of the State of California, For The County of Los Angeles

Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC

Case No.: LC102019 (c/w BC582154)

Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division

Brenda J. Cooper, et al., *Plaintiffs*, vs. Meritor Inc., et al., *Defendants*

Case Number: 4:16-cv-52-DMB-JVM

Rosenfeld Deposition: July 2017

2. Response to Comments

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No.: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Doug Pauls, et al., et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No.: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition, June 2015

In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward DeRuyter, Defendants
Rosenfeld Deposition: July 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

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In the County Court of Dallas County Texas

Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant*.
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio

John Michael Abicht, et al, *Plaintiffs* vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division

Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and
on behalf of those similarly situated, *Plaintiffs* vs. BP Products North America, Inc., *Defendant*.
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland

Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

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2. Response to Comments

EXHIBIT C

2. Response to Comments



Technical Consultation, Data Analysis and
Litigation Support for the Environment

1640 5th St., Suite 204 Santa
Santa Monica, California 90401
Tel: (949) 887-9013
Email: mhagemann@swape.com

Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Industrial Stormwater Compliance
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 – 2003);

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2. Response to Comments

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 100 environmental impact reports since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, Valley Fever, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

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With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

2. Response to Comments

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

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2. Response to Comments

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

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At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

2. Response to Comments

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nationwide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

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Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

2. Response to Comments

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

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Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

2. Response to Comments

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

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Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

2. Response to Comments

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukunaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

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2. Response to Comments

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

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Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.

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2. Response to Comments

EXHIBIT D

2. Response to Comments



June 3, 2021

Mr. Mitchell Tsai
Mitchell M. Tsai, Attorney at Law, PC
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: Oaks Springs Ranch Phase 2 Project SEIR Air Quality and GHG Impact Review, City of Wildomar

Dear Mr. Tsai:

Introduction

RK ENGINEERING GROUP, INC. (RK) is pleased to provide this review of the air quality and greenhouse gas (GHG) impacts from the Oaks Springs Ranch Phase 2 Project (hereinafter referred to as project), located in the City of Wildomar, California. This review is based on the information provided in the Oaks Springs Ranch Phase 2 Project: Revised Plot Plan Supplemental Environmental Impact Report, April 2021 (hereinafter referred to as SEIR).

According to the SEIR, the project includes a plot plan to develop 288 multifamily dwelling units in nine buildings and one amenity building on 12.89 acres.

C-29

The purpose of this letter is to review the SEIR from an air quality and GHG impact standpoint and provide comments to help ensure that all potential impacts from the project are adequately identified and the effects mitigated to the maximum extent feasible.

RK specializes in preparing air quality and GHG impact studies for public agencies and the private sector community throughout California, and we are very familiar with the requirements and complexities for assessing air quality and GHG impacts under CEQA.

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Air Quality Comments

The following comments pertain to Section 5.2 Air Quality and Appendix 5.2-1 Air Quality and Greenhouse Gas Emissions Assumptions and Modeling in the SEIR.

1. Page 5.2-26. Additional Mitigation Measures for the Modified Project. The SEIR indicates that the project will require more soil hauling during the grading and construction process than the original project. The quantity of soil hauling should be clearly identified as part of the modified project description, as it has a direct impact on air quality emissions. According to the assumptions shown in Appendix 5.2-1, the modified project will require the total import of approximately 11,100 cubic yards of material. C-29
CONT'D
2. Page 5.2-26. Additional Mitigation Measures for the Modified Project. Mitigation Measure AQ-1 is inaccurate and makes contradictory statements about the daily truck hauling restrictions for the project. As shown in Appendix 5.2-1, Page 145 out of 519, the total two-way trips estimated for rough grading soil haul is 1,350 HHDT truck trips, and the total phase duration is 10 days. This indicates that the emissions model is only accounting for a maximum of 67.5 one-way truckloads per day in the analysis. Therefore, in order to ensure the project does not exceed the assumptions of the air quality analysis, mitigation measure AQ-1 should be revised to indicate the following:
 - The construction contractor(s) shall limit the hauling of soil generated from grading/excavation activities to a maximum of 67 truckloads per day. C-30
C-31Additional, it is recommended that the following parenthetical statement at the end of the first sentence of AQ-1 be removed, as it is misleading and inaccurate.
 - ~~(1,350 one way soil haul trips per day if 16 cubic yard trucks are used; or 675 one way soil haul trips if double haul trucks with a 30 cubic yard capacity is used; and assuming a one way haul distance of 65 miles).~~ C-32
3. Page 5.2-29. Construction Health Risk. The SEIR does not provide a quantified Health Risk Assessment from the exposure of diesel particulate matter (DPM) during construction to nearby sensitive receptors. Given the proximity to adjacent sensitive receptors (less than 25 meters away) and the lack of a quantified assessment of the

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SCAQMD Toxic Air Contaminant Incremental Risk Thresholds, the project should presume the impact may be potentially significant and implement mitigation measures to reduce DPM emissions to the maximum extent feasible. This would include, but is not limited to, requiring all diesel off-road equipment be fitted with Tier 4 engines, limiting the amount of diesel equipment that can operate simultaneously, staging diesel equipment as far away from the adjacent homes as feasible, and suspending diesel equipment operations during days when the Air Quality Index reaches "Unhealthy" levels.

C-32
CONT'D

4. Appendix 5.2-1. Assumptions Worksheets. Numerous adjustments to the default emissions model have been made that lack substantial evidence and enforceable control measures to justify the changes. Many of these adjustments result in lower emissions than what would typically occur when using the default modeling assumptions and require further explanation and disclosure to support the changes. The following list summarizes the main areas of concern:

C-33

- The amount of diesel off-road equipment has been reduced based on "info from applicant". Given the difficulty of monitoring and enforcing equipment usage during construction, the SEIR should include a mitigation measure that clearly identifies and limits the maximum daily equipment allowances based on the non-default assumptions used in the air quality analysis.
- Tier 4 engines have been assumed for the majority of diesel off-road equipment. This should be clearly identified as a mitigation measure to ensure adequate enforcement and compliance. Furthermore, considering the project did not provide a diesel Health Risk Assessment and is significant for NOx, it is recommended that ALL diesel off-road equipment include Tier 4 engines to reduce the potentially significant impact to the maximum extent feasible.
- Construction Worker and Vendor trips have been substantially reduced below default estimates "based on data provided by applicant". RK was not able to locate this data in the SEIR. Based on our experience, adjustments to construction worker and vendor trips are not commonly made in CalEEMod, and would require substantial evidence to support such changes, such as a detailed trip generation study. Modifying the worker and vendor trips assumptions is inappropriate and may result in under reporting of emissions.

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- No gas fireplaces have been modeled as part of the analysis. In order to ensure the project complies with this assumption and does not install gas fireplaces, a specific mitigation measure or project design feature should be provided that ensures the condition will be satisfied. This includes no outdoor gas fireplaces shall be allowed in the common areas.

C-36

5. Appendix 5.2-1. General Comment. The CalEEMod worksheets provided in Appendix 5.2-1 appear to have been altered from the original model output reports. It is recommended that the complete un-altered CalEEMod reports be provided to help ensure full transparency. If necessary, pages or tables in the emissions report sheets that are not applicable to the analysis can be indicated with callouts or notes to avoid any confusion.

C-37

Greenhouse Gas Comments

The following comments pertain to Section 5.3 Greenhouse Gas Emissions and Energy and Appendix 5.2-1 Air Quality and Greenhouse Gas Emissions Assumptions and Modeling in the SEIR.

6. Page 5.3-22. Area Sources. The SEIR indicates that Area source emissions are based on CalEEMod default values. However, as previously stated, the model defaults have been adjusted to show that no gas fireplaces will be provided. This change to the model needs to be clearly identified and a condition of approval will need to be placed on the project to ensure it is enforced.

C-38

7. Page 5.3-23. Water/Wastewater. The SEIR utilizes water and wastewater estimates from "information provided by the applicant", instead of the CalEEMod default assumptions. However, RK was not able to find any additional information to support these changes. Substantial evidence should be provided, such as a detailed water demand assessment, in order to support the model adjustments. As a result of this change, the SEIR may underestimate the GHG emissions associated with water supply and wastewater treatment.

C-39

8. Page 5.3-28. Electricity Energy. The analysis of project energy impacts should be modified to include discussion of the 2019 California Building Energy Efficiency Standards, which requires newly constructed low-rise multifamily residential

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buildings to have photovoltaic systems with annual electrical output equal to or greater than the dwelling's annual electrical usage. A condition that the project include solar panels should be clearly identified to ensure full compliance.

Conclusions

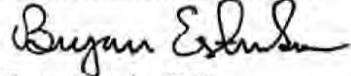
Based upon this review, the Oaks Springs Ranch Phase 2 Project SEIR has not analyzed and disclosed all potential air quality and greenhouse gas impacts from the construction and operation of the project. Additional analysis and mitigation measures should be provided to ensure the project does not exceed the applicable regional and local thresholds of significance.

C-40

CONT'D

RK Engineering Group, Inc appreciates this opportunity to work with Mitchell Tsai, Attorney at Law. If you have any questions regarding our review, or need additional analysis, please contact me at (949) 474-0809 or be@rkengineer.com.

Respectfully submitted,
RK ENGINEERING GROUP, INC.



Bryan Estrada, AICP
Principal

rk16667.doc
JN:2828-2021-01

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EXHIBIT E

2. Response to Comments



Bryan Estrada, AICP, PTP

Principal

Areas of Expertise

Transportation and Environmental Planning
Transportation Demand Management
Traffic Impact Studies
Parking Studies
Air Quality Analysis
Greenhouse Gas/Global Climate Change Analysis
Environmental Acoustics/Noise Analysis
CEQA Compliance
Synchro Traffic Analysis Software
California Emissions Estimator Model (CalEEMod)
FHWA Noise Modeling
SoundPLAN Software
AutoCAD

Education and Training

University of California, Irvine, B.A., Urban Studies
California Air Resources Board, Air Quality Training Program
Geo Instruments Vibration Monitoring Short Course

Professional History

RK Engineering Group, Inc.
Principal
2007 - Present

Certificates and Affiliations

American Institute of Certified Planners (AICP)
Professional Transportation Planner (PTP)
American Planning Association
Association of Environmental Professionals

Representative Experience

Mr. Bryan Estrada is a native of Southern California and also stayed in the area by attending the University of California, Irvine, School of Planning, Policy and Design where he received a Bachelor of Arts degree in Urban Studies. Mr. Estrada's multidisciplinary background is concentrated around current transportation challenges and their environmental impacts within urban areas. Mr. Estrada is committed to sustainable development practices, transportation demand management, and global climate change awareness.

Since 2007, Mr. Estrada has gained experience in the many aspects of Transportation and Environmental Planning while working with RK Engineering Group. He is an active member of the American Planning Association (APA) and the Association of Environmental Professionals (AEP), and stays up to date on the latest trends and topics concerning CEQA policy. He is frequently engaged with local government agencies, community groups, and developers to help to craft innovative solutions to mitigate traffic, noise and air quality impacts throughout the community.

Mr. Estrada's experience includes traffic/transportation planning, air quality and greenhouse gas analysis, and environmental acoustics/noise analysis. He has also contributed to the design and construction of traffic signal plans, signing and striping plans and traffic control plans. He is regularly out in the field performing assessments and inventories of project sites and meeting with community stakeholders.

Mr. Estrada works on transportation and environmental planning projects that range from focused site-specific technical studies to regional and General Plan level analyses. His recent work includes Mixed Use Development projects in Downtown Huntington Beach, the City of Aliso Viejo General Plan Update and Aliso Viejo Town Center Vision Plan, Eleanor Roosevelt High School eSTEM Academy Traffic Impact Study and On-Site Circulation Plan (Eastvale, CA), Great Wolf Lodge Resort (Garden Grove, CA), Starbucks Coffee Shops (multiple locations through Southern California), Paradise Knolls Specific Plan (Jurupa Valley, CA), Vista Del Agua Specific Plan (Coachella, CA), and Monterey Park Hotel Mixed Use Development Project (Monterey Park, CA).

Mr. Estrada has obtained the American Institute of Certified Planners (AICP) certification granted by the American Planning Association and the Professional Transportation Planner (PTP) certification granted by the Transportation Professional Certification Board.

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2. Response to Comments

C. Response to Comments from Mitchel M. Tsai (on behalf of Southwest Regional Council of Carpenters), dated June 4, 2021.

C-1 The commenter states that the Southwest Regional Council of Carpenters (SWRCC) reserve the right to supplement these comments at or prior to hearings for the Modified Project, and requests that the City provide notice for all notices referring or related to the Modified Project.

The comment does not describe any inadequacies in the CEQA analysis or challenge any conclusions in the Draft SEIR, therefore no changes to the Draft SEIR are necessary. The commenter has been added to the distribution list for the Modified Project and will be informed of all notices regarding the Modified Project.

C-2 The commenter states that the City should require the applicant to provide additional community benefits such as local hire and use of skilled and trained workforce who have graduated from a Joint Labor Management apprenticeship training program to build the Modified Project.

The comment does not describe any inadequacies in the CEQA analysis or challenge any conclusions in the Draft SEIR, therefore no changes to the Draft SEIR are necessary.

C-3 The commenter states that local hire and skilled and trained workforce requirements can reduce environmental impacts and improve the positive economic impact of the Modified Project such as reduced greenhouse gas emissions and length of vendor trips, as well as providing localized economic benefits.

With implementation of mitigation, the Modified Project would not result in any significant impacts with respect to air quality or greenhouse gas emissions during construction. Therefore, no additional mitigation, including the mitigation suggested by the commenter, is warranted. CEQA only requires consideration of mitigation measures for significant environmental effects. (Public Resources Code §21100(b)(3); 14 Cal Code Regs §15126.4(a)(3); see *San Franciscans for Reasonable Growth v. City & County of San Francisco* (1989) 209 Cal.3d 1502.)

C-4 The commenter states that skilled and trained workforce requirements promote the development of skilled trades that yield sustainable development and are key to delivering emissions reductions and moving California closer to its climate targets.

See response to Comment C-3.

C-5 The commenter states that local skilled and trained workforce requirements and policies have significant environmental benefits since they improve an area's jobs-housing balance, and decrease the amount and length of job commutes and their associated greenhouse gas emissions. The commenter states that the South Coast Air Quality Management

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District stated that local state-certified apprenticeship programs with a local hire component can result in air pollutant reductions.

See response to Comment C-3. The commenter states that local skilled and trained workforce requirements could provide environmental benefits by improving an area's jobs-housing balance and reducing amount and length of job commutes.

The comment does not describe any inadequacies in the CEQA analysis or conclusion in the Draft SEIR, therefore no changes to the Draft SEIR are necessary.

C-6 The commenter states that locating jobs closer to residential areas can reduce vehicle miles traveled (VMT) and vehicle hours traveled. The commenter states that simply placing jobs near housing is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.

The comment does not describe any inadequacies in the CEQA analysis or challenge any conclusions in the Draft SEIR, therefore no changes to the Draft SEIR are necessary.

C-7 The commenter states that the City should require the Modified Project to be built to standards exceeding the current 2019 California Green Building Code to mitigate the Modified Project's environmental impacts and to advance progress towards California's environmental goals.

There is no legal requirement to exceed the current 2019 California Green Building Code. The proposed mitigation measures in the Draft SEIR reduce impacts to a less-than-significant-level without exceeding the 2019 California Green Building Code.

C-8 The commenter summarizes the work experience of Bryan Estrada, AICP, PTP, a transportation planner whose comments are included in this comment letter.

The comment does not describe any inadequacies in the CEQA analysis or challenge any conclusions in the Draft SEIR, therefore no changes to the Draft SEIR are necessary.

C-9 The commenter states that CEQA has two basic purposes; the first is that CEQA is designed to inform decision makers and the public about potentially significant environmental impacts of a project and the second is that CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. The commenter states that courts reviewing an EIR should not rely on every study presented by a project proponent, and states that the EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences.

The comment does not describe any inadequacies in the CEQA analysis or challenge any conclusions in the Draft SEIR, therefore no changes to the Draft SEIR are necessary.

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C-10 The commenter states the Draft SEIR should be revised and recirculated to provide the public adequate opportunity to review and comment on the Modified Project's actual air quality, greenhouse gas, and noise effects.

This comment does not specifically address which portions of the air quality, greenhouse gas, and noise analyses need to be revised. Responses to specific air quality, greenhouse gas, and noise issues raised by the commenter are below.

C-11 The commenter notes that since the certification of the 2007 EIR, mitigation measures previously found not to be feasible would be feasible and would substantially reduce air quality emissions of the Modified Project. The commenter alleges that with mitigation measures, the Modified Project's nitrogen oxide emissions would be less than significant. The commenter states that the air quality analysis is undermined by incomplete and unsubstantiated calculations and inaccurate and inadequate mitigation measures, based on an air quality analysis provided by the commenter's consultant.

All emissions modeling assumptions in the Draft SEIR's air quality model are supported by substantial evidence. By contrast, an opinion by the commenter's consultant that different modeling assumptions should have been incorporated into the model does not constitute substantial evidence.

The mitigation measure text is revised as follows to correct a typographical error and is now consistent with the mitigated construction model (see also Final EIR, Chapter 3, *Rewrites to the Draft EIR*):

AQ-1 During construction activities, the construction contractor(s) shall limit the hauling of soil generated from grading/excavation activities to a maximum of ~~140 trucks per day 134 one-way soil haul trips per day (1,350 one-way soil haul trips per day assuming~~ 16 cubic yard trucks are used; or 675 one-way soil haul trips if double haul trucks with a 30 cubic yard capacity is used; and assuming a one-way haul distance of 65 miles). The developer is required to find an export site within a 65-mile radius, and if one cannot be located, then the truck trips per day will need to be reduced to ensure impacts remain less than significant. Haul trucks with engines that are 2010 or newer shall be used for soil hauling activities. These requirements shall be noted on all construction management plans and verified by the City of Wildomar Building & Safety Department prior to issuance of any construction permits and during the soil-disturbing phases.

As identified on PDF pages 14 through 19 of Appendix 5.2-1, by applying Mitigation Measure AQ-1 to limit hauling of soil generated from grading/excavation activities to a maximum of 134 trip ends per day, the maximum daily NO_x emissions would be 94 lb/day, which would not exceed the South Coast AQMD NO_x threshold of 100 lb/day.

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C-12 The commenter alleges that Exhibit D to the comment letter describes how the Draft SEIR fails to disclose all potential air quality impacts and sufficiently analyze measures to mitigate those impacts. The commenter alleges that numerous adjustments to the air emission modeling software (CalEEMod) default assumptions were made that resulted in lower emission estimates than what would typically occur when using the default modeling assumptions, and that these changes are not supported by substantial evidence.

Changes to the CalEEMod default information and justification may be found in the Assumptions worksheet in Appendix 5.2-1, PDF pages 109 through 114 for Modified Project construction, page 155 through 156 for Modified Project mitigated construction, pages 264 through 309 for Modified Project operations, and pages 426 through 474 for Original Project operations. Furthermore, clarification on the inputs may be seen in the Assumptions Worksheet section in Appendix 5.2-1, PDF pages 23 through 29 for Modified Project construction, page 24 for Modified Project mitigated construction, pages 30 through 32 for Original Project operations, and pages 33 through 35 for Modified Project operations. The Modified Project input assumptions are based on data provided by the applicant. The input assumptions also incorporate the mitigation measures outlined in the Original Project with the exception of the engine tier ratings to represent onsite conditions while providing conservative estimates on emissions from use of construction equipment. As identified in the CalEEMod User's Guide, "The user may override the defaults to input more accurate, project-specific information as appropriate."

C-13 The commenter states that Mitigation Measure AQ-1 is inaccurate and self-contradicting, as it would allow for more than double the daily soil haul trips than were assumed during air emissions modeling, potentially allowing for significantly more emissions than modeled and the exceedance of emission thresholds.

See response to Comment C-11.

C-14 The commenter states that the Draft SEIR fails to quantitatively evaluate the Modified Project's potential to pose health risks to sensitive receptors located less than 25 meters from the construction area, and that the Modified Project should be presumed to cause significant health impacts. The commenter states that the Draft SEIR must be revised and recirculated with an accurate and complete air quality analysis.

As seen on pages 5.2-28 and 5.2-29, the construction-phase LST analysis considers the impact to sensitive receptors within 82 feet (25 meters) of the construction site, which is the closest receptor distance on the mass rate LST look-up tables. As stated in the South Coast AQMD Final Localized Significance Threshold Methodology, projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters. Therefore, no changes to the model methodology is required.

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As shown in Table 5.2-11, the construction of the Modified Project would not generate construction-related on-site emissions that would exceed the screening-level LSTs. Therefore, no additional mitigation measures are required.

C-15 The commenter alleges that similar to the air quality analysis, the greenhouse gas emissions analysis is undermined by unsubstantiated emission modeling inputs and the failure to consider relevant information. The commenter claims that the GHG emission modeling default assumption were adjusted without explanation or sufficient justification and the Draft SEIR failed to include a discussion of the 2019 California Green Building Code.

The inputs assumptions are based on data provided by the applicant and incorporates the mitigation measures outlined in the Original Project. As identified in the CalEEMod User's Guide, "The user may override the defaults to input more accurate, project-specific information as appropriate." As seen on PDF page 31, the operational model included the energy savings based on the NORESCO study, "2019 Update to the California Energy Efficiency Standards for Residential and Non-Residential Buildings". This input is consistent with the 2019 California Green Building Code.

C-16 The commenter states that the Draft SEIR fails to entirely disclose, analyze, or mitigate the Modified Project's construction and operational noise impacts on the existing occupants of the 312 multifamily dwelling units constructed as part of the Original Project. The commenter states that Figure 1-2 of the Draft SEIR shows the proximity of the currently-occupied units and the proposed units.

CEQA only requires an analysis of a project's impact on the environment and not the environment's impact on a project. (*Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768.) In this case, buildup of the project includes Phase I and Phase II. The effect of construction noise from construction of Phase II on Phase I is not an impact of the project on the environment but rather, an impact of the project on itself, which does not constitute an environmental impact pursuant to CEQA. Therefore, the Phase I residents are not considered sensitive receptors for purposes of this analysis.

C-17 The commenter opines that the Draft SEIR's omission of information concerning the noise impacts to the existing residents and measures to mitigate those impacts is intentional. The commenter states that the exclusion of the Phase I residents as sensitive receptors is legally incorrect, and that the Draft SEIR avoids acknowledging that the Modified Project would result in a significant noise impact to those residents.

See response to Comment C-16.

C-18 The commenter states that the 2007 EIR evaluated the Original Project's potential noise impacts and determined that the closest receptor was a residence 367 feet from the northern boundary, and that impacts to these residents would be less than significant with mitigation incorporated. The commenter states that rather than acknowledging the

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residents of Planning Area 1 as sensitive receptors approximately 100 feet from Planning Area 2, the Draft SEIR references sensitive receptors 830 feet north of the project site. The commenter states that if mitigation measures were needed for the Original Project, then the Modified Project would cause significant noise impacts to residents less than 100 feet away, and that these impacts should be evaluated in detail in the Draft SEIR.

See response to Comment C-16.

C-19 The commenter states that the Draft SEIR hides behind the Original Project's description and timeline across more than a decade and many changed circumstances to avoid fully addressing Phase 2's effects on Phase's residents. The commenter states that the Draft SEIR does not apply the same approach throughout the analysis; the air quality analysis expresses impacts on Phase 1 residents.

See response to Comment C-16. As seen on Appendix 5.2-1, PDF page 26, the Phase 2 project construction schedule would occur between April 2022 through April 2024, over a period of 24 months. In addition, as seen in response to comment C-14, the LST analysis in Section 5.2, *Air Quality*, considers the Phase 1 residences to be the nearest receptors and uses the closest possible distance of 82 feet (25 meters) to discuss impacts to these residences. Therefore, the modeling is conservative. Contrary to the commenter's assertion, CEQA does not require the approach on various impact analyses to be identical. It is entirely proper under CEQA to make conservative assumptions in the analysis of one or more issue areas. (*San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 25.)

C-20 The commenter states that contrary to the Draft SEIR's justification for ignoring impacts to the Original Project's residents currently residing in Planning Area 1, it is appropriate and often necessary to consider effects to project residents and users.

See response to Comment C-16.

C-21 The commenter states that the City is obligated by state law to ensure any zoning action it takes to approve the construction of Phase 2 is consistent with the City's General Plan and associated programs, as state law requires all zoning ordinances and other land use decisions be consistent with the general plan. The commenter states that the City is obligated to evaluate whether granting a General Plan Amendment, Specific Plan Amendment, Zoning Ordinance Amendment, and other discretionary land use decisions would be consistent with the City's General Plan Noise Element goals, including Policy N-12.1 and Policy N-12.2.

As discussed in the SEIR under Impact 5.4-2, with approval of the requested General Plan Amendment, which is part of the requested Project entitlements, the Modified Project will be consistent with the City's General Plan. The Modified Project would comply with Policy N-12.1 and 12.2, as noted in the Noise section of the SEIR.

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C-22 The commenter states SWRCC recommends that the Lead Agency adopt additional CEQA mitigation measures to mitigate public health risks related to COVID-19 during construction activities such as construction site design, testing procedures, and planning. The state of California has lifted COVID-19 restrictions therefore no changes to the Draft SEIR are necessary. See also response to comment C-16 as COVID-19 is part of the environment and CEQA is not required to evaluate the impact of the environment on a project. There is no basis for the City to adopt additional mitigation measures.

C-23 The commenter states that the City should revise and recirculate the Modified Project's EIR to address the aforementioned concerns. This comment has been addressed through responses to previous comments (see Response to Comment C-1 through C-22). As discussed, there is no basis for the City to revise or recirculate the Modified Project's EIR.

C-24 The commenter states that CalEEMod is a computer model used to quantify criteria pollutant and greenhouse gas emissions associated with construction and operations from a variety of land use projects. The commenter states that the number, length, and vehicle class of worker trips are utilized to calculate emissions during project construction, and that the number and length of vehicle trips are utilized to estimate the vehicle miles traveled (VMT) associated with construction. The commenter states there is a direct link between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. The comment does not describe any inadequacies in the CEQA analysis or challenge any conclusions in the Draft SEIR, therefore no response is necessary.

C-25 The commenter states that it is important to consider the CalEEMod default worker trip parameters in order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations. The commenter states that if more project information is known, the CalEEMod user can change the default values and input project-specific values, but CEQA requires such changes to be justified by substantial evidence. The commenter states that default trip length is based on the location and urbanization level selected by the CalEEMod user when modeling emissions. The Modified Project's CalEEMod modeling assumptions were based on Project-specific data provided by the applicant, which constitutes substantial evidence.

C-26 The commenter states that default urban worker trip lengths tend to be shorter in length than default rural trip lengths, and therefore it can be assumed that the efficacy of a local hire requirement is dependent upon the urbanization of the project site, as well as the project location.

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The comment does not raise any issues related to the Modified Project's impact on the physical environment under CEQA. See response to Comment C-3 regarding the request for a local hire requirement.

C-27 The commenter provides an example of the potential impact of a local hire provision on construction-related GHG emissions, which shows that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with the project construction in the example would decrease by approximately 17 percent. The commenter states that any local hire requirements that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions. The commenter states that this serves as an example of the potential impacts of local hire requirements, though it does not indicate that local hire requirements would result in reduced construction-related GHG emissions for all projects as it depends on the worker trip length, default worker trip length for the project's urbanization level, and location.

See response to Comment C-3 regarding the request for a local hire requirement.

C-28 The commenter provides the educational and professional experiences of Paul Rosenfeld, Ph.D and Matthew F. Hagemann, P.G, C.Hg, QSD, QSP.

The comment does not describe any inadequacies in the CEQA analysis or challenge any conclusions in the Draft SEIR, therefore no changes to the Draft SEIR are necessary.

C-29 The commenter states that the SEIR indicates that the Modified Project would require more soil hauling during grading and construction process than the Original Project.

As seen on Appendix 5.2-1, PDF page 24, the Modified Project Phase 2 rough grading soil haul would require 10,800 cubic yards of soil import while the fine grading soil haul would require 3,000 cubic yards of soil import. Chapter 5.2, *Air Quality*, evaluates the environmental impacts of the additional haul required for the Modified Project.

C-30 The commenter states that Mitigation Measure AQ-1 is inaccurate and makes contradictory statements about the daily truck hauling restrictions for the Modified Project.

See response to Comment C-11.

C-31 The commenter states that Mitigation Measure AQ-1 should be revised to indicate that the construction contract(s) shall limit the hauling of soil generated from grading/excavation to a maximum of 67 truckloads per day, and that the parenthetical statement at the end of Mitigation Measure AQ-1 be removed.

See response to Comment C-11. There is no basis for the commenter's suggestion to limit soil hauling to 67 truckloads per day. The mitigated model run accounts for a maximum

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of 134 one-way truck trips per day. As discussed in response to Comment C-11, the original mitigation text has been revised in Final EIR Chapter 3, *Revisions to the Draft EIR*, to correctly reflect the NO_x mitigation applied.

C-32 The commenter states that the Draft SEIR does not provide a quantified Health Risk Assessment from the exposure of diesel particulate matter during construction to nearby sensitive receptors, and that the Modified Project should presume the impact may be potentially significant and implement mitigation measures.

See response to Comment C-14. The LST analysis considers the Phase 1 residences to be the nearest receptors and uses the closest possible distance of 82 feet (25 meters) to discuss impacts to these residences. Based on the annual *Air Quality and CalEEMod Update* workshop hosted by the Association of Environmental Professionals (AEP) and conducted by Mike Krause and Barbara Radlien at the South Coast AQMD in 2017 through 2019, a construction health risk assessment is not warranted if emissions do not exceed the screening-level LSTs. Based on the construction model outputs, all construction phases would not exceed their respective NO_x, CO, PM₁₀, and PM_{2.5} LSTs (see Table 5.2-11). Based on the short-term nature of the Modified Project's construction activities, the fact that the Modified Project's emissions would not exceed screening-level LSTs, and the guidance provided by South Coast AQMD, the City determined that a health risk assessment was not warranted and that construction equipment exhaust generated by the proposed project would not result in new impact or a substantial increase in impacts compared to that identified in the Certified EIR (see Section 5.2, *Air Quality*).

Furthermore, as noted in response to Comment C-34, the applicant has identified that the construction contractor would utilize US Environmental Protection Agency Tier 4-rated engines for large construction equipment onsite. Therefore, Tier 4-rated engines were assumed in CalEEMod for large construction equipment. A mitigation measure requiring Tier 4 construction equipment is not warranted under CEQA. Nonetheless, the commenter's request to require Tier 4 construction equipment will be forwarded to the decision-makers for their consideration.

Mitigation Measure 5.2-2A, included in the Certified EIR, would also be applicable to the proposed project and restricts construction on days when wind gusts exceed 25 miles per hour. At the request of the Commenter, the request to suspend construction during days when the Air Quality Index (AQI) reaches unhealthy levels (i.e., corresponds to an AQI of 150 or higher), will be forwarded to the decision-makers for their consideration, although it is not warranted to be incorporated into the EIR pursuant to CEQA.

The commenter's request to stage diesel equipment as far from adjacent homes as feasible will be forwarded to the decision-makers for their consideration, although it is not warranted under CEQA.

2. Response to Comments

C-33 The commenter states that numerous adjustments to the default emissions model have been made without substantial evidence and enforceable control measures, and states that the amount of diesel off-road equipment has been reduced based on “info from applicant.” The commenter states that given the difficulty of monitoring and enforcing equipment, a mitigation measure should be included to identify and limit the maximum daily equipment allowances.

Clarification on the inputs used for the CalEEMod models may be seen in the Assumptions Worksheet section in Appendix 5.2-1, PDF pages 23 through 29 for Modified Project construction. The construction model uses the equipment mix provided by the applicant to accurately represent onsite conditions during construction. As identified in the CalEEMod User’s Guide, “The user may override the defaults to input more accurate, project-specific information as appropriate.” A mitigation measure limiting construction equipment onsite is not warranted as the Modified Project would not result in a new impact or a substantial increase in magnitude of impacts identified in the Certified EIR.

C-34 The commenter states that Tier 4 engines have been assumed for the majority of diesel off-road equipment and states that this should be identified as a mitigation measure. The commenter states that the SEIR did not provide a diesel Health Risk Assessment and is significant for NO_x, it is recommended that all diesel off-road equipment include Tier 4 engines.

Based on the equipment mix information provided by the applicant, where relevant, Tier 4 engines were noted in the CalEEMod inputs file. However, as seen in the construction model on PDF pages 109 through 114 of Appendix 5.2-1, the engine tier ratings were not accounted for in the model for the most conservative results. Contrary to the commenter’s assertion, CEQA does not require components of a project, or project design features, to be incorporated into an EIR as mitigation measures. Therefore, a mitigation measure requiring Tier 4 engines is not warranted.

C-35 The commenter states that construction worker and vendor trips have been substantially reduced below default estimates “based on data provided by applicant,” and states that this data was not found in the SEIR. The commenter states that adjustments to construction worker trips and vendor trips are not commonly made in CalEEMod and would require substantial evidence to support these changes.

See response to Comment C-33. The construction model uses the worker and vendor trips provided by the applicant to provide an accurate representation of onsite conditions during construction.

C-36 The commenter states that no gas fireplaces have been modeled as part of the analysis, and states that in order to ensure the project complies with this assumption, a mitigation

2. Response to Comments

measure or project design feature should be provided that ensures the condition will be satisfied, and this should also include no outdoor gas fireplaces in common areas.

Based on information from the applicant, gas fireplaces are not a part of the project description or site plans. As identified in Section 5.2, *Air Quality*, and Section 5.3, *Greenhouse Gas Emissions*, the Modified Project would not generate new significant impacts not previously identified in the Certified EIR. Therefore, a mitigation measure prohibiting gas fireplaces is not warranted.

C-37 The commenter states that the CalEEMod worksheets provided in Appendix 5.2-1 appear to have been altered from the original model output reports and it is recommended that the complete unaltered CalEEMod reports be provided for full transparency, and that pages or tables not applicable to the analysis can be indicated with callouts or notes to avoid confusion.

Because construction and operation were modeled separately, the operational outputs from the construction model and construction outputs from the operational model were hidden to avoid confusion, since they are not utilized in the EIR. All relevant model outputs are included in Appendix 5.2-1.

C-38 The commenter states that the SEIR indicates that area source emissions are based on CalEEMod default values, however, the model defaults have been adjusted to show that no gas fireplaces will be provided, and states this change to the model needs to be clearly identified as a condition of approval to ensure it is enforced.

Based on information from the applicant, gas fireplaces are not a part of the project description or site plans. Therefore, gas fireplaces were not included as part of the model. The Modified Project would not generate new significant impacts not previously identified in the Certified EIR.

C-39 The commenter states that the SEIR utilizes water and wastewater estimates from “information provided by the applicant” instead of the CalEEMod default assumptions, however there is no additional information to support these changes.

The operational model uses the water/wastewater numbers provided by the Fuscoe (see Appendix 1 of this FEIR), which were determined using EVMWD’s planning criteria, to provide an accurate representation of onsite conditions during operations of the Modified Project.

C-40 The commenter states that the analysis of project energy impacts should be modified to include a discussion of the 2019 California Building Energy Efficiency Standards, which requires newly constructed low-rise multifamily residential buildings to have photovoltaic systems with annual electrical output equal to or greater than the dwelling’s annual

2. Response to Comments

electrical usage, and that a condition that the project include solar panels should be identified.

As the Modified Project would begin construction in 2022, it would be subject to the 2019 Building Energy Efficiency Standards. As such, the Modified Project's operational model reflects the 2019 Title 24 energy intensity, which is a 2 percent electricity reduction and 5 percent natural gas reduction from the 2016 energy intensity based on the NORESCO study (see PDF page 31 of Appendix 5.2-1). The Modified Project's operations would not exceed the GHG emissions threshold of 3,000 MTCO₂e. The operational model for the Modified Project did not include energy savings from installation of a PV system. Therefore, the modeling is conservative.

The Draft SEIR adequately analyzes the air quality and GHG emissions impacts of the Modified Project. As summarized in response to Comments C-29 through C-39 above, the Modified Project would not result in a substantial increase in impacts or new impacts compared to those identified in the Certified EIR.

C-41 The commenter includes the resume for Bryan Estrada, AICP, PTP.

The comment does not describe any inadequacies in the CEQA analysis or challenge any conclusions in the Draft SEIR, therefore no changes to the Draft SEIR are necessary. The commenter has been added to the distribution list for the Modified Project and will be informed of all notices regarding the Modified Project.

3. Revisions to the Draft SEIR

3.1 INTRODUCTION

This section contains revisions to the Draft SEIR based upon a typographical error. Changes made to the Draft SEIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

3.2 DRAFT SEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

Mitigation Measure AQ-1 of Chapter 5.2, *Air Quality*, has been revised as follows:

AQ-1 During construction activities, the construction contractor(s) shall limit the hauling of soil generated from grading/excavation activities to a maximum of ~~440 trucks per day~~ 134 one-way soil haul trips per day (~~1,350 one-way soil haul trips per day~~ assuming 16 cubic yard trucks are used; or 675 one-way soil haul trips if double haul trucks with a 30 cubic yard capacity is used; and assuming a one-way haul distance of 65 miles). The developer is required to find an export site within a 65-mile radius, and if one cannot be located, then the truck trips per day will need to be reduced to ensure impacts remain less than significant. Haul trucks with engines that are 2010 or newer shall be used for soil hauling activities. These requirements shall be noted on all construction management plans and verified by the City of Wildomar Building & Safety Department prior to issuance of any construction permits and during the soil-disturbing phases.

3. Revisions to the Draft SEIR

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Irvine
San Diego
Ontario
Los Angeles

TO: JESSICA CASSOLATO - TRAMMEL CROW RESIDENTIAL
FROM: STEVEN L. ELLIS, P.E.
SUBJECT: OAK SPRINGS RANCH - SEWER AND WATER FLOW RATES
DATE: 2/4/21
CC:

Per EVMWD's planning criteria, the following is the flow that can be assumed to be generated/consumed by the proposed project:

Sewer: 1090 GPD/AC x 12.89 AC = 14,050 GPD

Water: 3500 GPD/AC x 12.89 AC = 45,115 GPD

full circle thinking®

July 2021 | Mitigation Monitoring and Reporting Program
State Clearinghouse No. 2004071076

OAK SPRINGS RANCH PHASE 2 PROJECT: REVISED PLOT PLAN SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (PA 20-0048)

City of Wildomar

Prepared for:

City of Wildomar

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1. Introduction

1.1 PURPOSE OF MITIGATION MONITORING PROGRAM

This Mitigation Monitoring Program has been developed to provide a vehicle by which to monitor mitigation measures and conditions of approval outlined in the Draft Supplemental Environmental Impact Report (DSEIR), State Clearinghouse No. 2004071076. The Mitigation Monitoring Program has been prepared in conformance with Section 21081.6 of the Public Resources Code and the City of Wildomar Monitoring Requirements. Section 21081.6 states:

- (a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:
 - (1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.
 - (2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

1.2 EIR SUMMARY

1.2.1 PROJECT LOCATION

The project site is within the City of Wildomar in western Riverside County. The entire Oak Springs Ranch Specific Plan site (Assessor's Parcel Numbers [APN] 380250035, 380250038, 380250036) is approximately 48.15 acres and is bound by Clinton Keith Road to the north, Inland Valley Drive to the east, Inland Valley Medical Center and Interstate 15 (I-15) to the south, and Oak Springs Road to the west. The project site (APN 380250038) is currently vacant; the portion of the Specific Plan area located to the north of the project site has been developed with the 312 multifamily dwelling units. The proposed 288 multifamily dwelling units and amenity building would be in the central portion of the site.

1. Introduction

1.2.2 PROJECT SUMMARY

The 2007 Oak Springs Ranch Specific Plan Project (Original Project) EIR (2007 EIR) was certified by the Riverside County in 2007 (Clearinghouse [SCH] No. 2004071076). The approved Original Project allows for the development of 312 multifamily dwelling units in Planning Area 1 and 103 single-family units in Planning Area 2 (for a total of 415 dwelling units) on a 48.15-acre site (“Specific Plan area”), and allows for approximately 14 acres to remain as undeveloped open space in Planning Area 3, with approximately 34 acres developed for residential uses. In 2014, the 312 multifamily dwelling units were constructed.

The Modified Project would eliminate the approved 103 single-family dwelling units designated in Planning Area 2 (PA2) of the Specific Plan area to instead construct 288 multifamily dwelling units. The following project actions are requested of the City by the applicant and reviewed in this SEIR.

1.3 ENVIRONMENTAL IMPACTS

The 2007 EIR included mitigation measures for topical sections that were deemed potentially significant in an effort to reduce impacts. The Modified Project impacts would not result in new significant environmental effects or a substantial increase in the severity of the Original Project’s previously identified significant effects, and the Modified Project would not result in new or more significant impacts.

1.3.1 Impacts Considered Less Than Significant

The DSEIR identified various thresholds from the CEQA Guidelines among a number of environmental categories that would not be significantly impacted by the Modified Project. Impacts to the following were found to be less than significant:

- Agriculture and Forestry Resources
- Biological Resources
- Hydrology and Water Quality
- Mineral Resources
- Recreation
- Utilities and Service Systems
- Wildfire

1.3.2 Potentially Significant Adverse Impacts That Can Be Mitigated, Avoided, or Substantially Lessened

The DSEIR identified various thresholds from the CEQA Guidelines among a number of environmental categories that could be reduced, avoided, or substantially lessened through the implementation of the 2007 EIR mitigation measures, as shown in Chapter 8, *Impacts Found Not to be Significant*, of this DSEIR.

- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Tribal Cultural Resources

1. Introduction

1.3.3 Unavoidable Significant Adverse Impacts

The 2007 EIR identified the following impacts as significant and unavoidable for the Original Project (numbering is from the 2007 EIR). No new significant and unavoidable impacts were identified for the Modified Project. The Modified Project would not result in any new or substantially more severe significant impacts. In fact, with mitigation, all of the impacts below would be reduced to a less than significant level.

Air Quality

- **Impact 5.2-2:** Implementation of the Oak Springs Ranch Specific Plan would violate air quality standards and contribute substantially to an existing or projected air quality violation.
- **Impact 5.2-3:** The Oak Springs Ranch Specific Plan project would result in a cumulatively considerable net increase of criteria pollutants for which the SoCAB is in nonattainment.
- **Impact 5.2-4:** Construction of the Oak Springs Ranch Specific Plan would expose sensitive receptors project to substantial concentrations of PM₁₀ during grading operations.
- **Impact 5.2-6:** The Oak Springs Ranch Specific Plan project would expose sensitive receptors within 500 feet of Interstate 15 to substantial pollutant concentrations.

Noise

- **Impact 5.9-1:** The project would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Traffic and Circulation

- **Impact 5.12-1:** The proposed project would cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system exceeding, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.

2. Mitigation Monitoring Process

2.1 MITIGATION MONITORING PROGRAM ORGANIZATION

Overall Mitigation Monitoring and Reporting Program (MMRP) management is the responsibility of the City of Wildomar. The City's technical consultants (CEQA consultant, etc.) may perform related monitoring tasks under the direction of the environmental monitor if they are contracted by the City.

2.2 CITY OF WILDOMAR

As the lead agency, the City is responsible for the review of all monitoring reports, enforcement actions and document disposition. The City will rely on information provided by individual monitors (e.g., CEQA consultant, etc.) as accurate and up to date, and will field check mitigation measure status, as required.

2.3 MITIGATION MONITORING TEAM

The mitigation monitoring team, consisting of the designated Project Manager and Technical Consultants (CEQA consultant, etc.) are responsible for monitoring implementation and compliance with all adopted mitigation measures and conditions of approval. A major portion of the team's work is in-field monitoring and compliance report preparation. Implementation disputes are brought to the Project Manager/City Planning Director.

2.3.1 Monitoring Team

The following summarizes key positions in the MMRP and their respective functions:

- **Project Manager:** Responsible for coordination of mitigation monitoring team, technical consultants, report preparation, and overall program administration and document/report clearinghouse.
- **Construction Contractor:** Responsible for coordination of mitigation monitoring team; technical consultants; report preparation; and implementation the monitoring program, including overall program administration, document/report clearinghouse, and first phase of dispute resolution.
- **Technical Consultants:** Responsible for monitoring in respective areas of expertise (CEQA consultant, project engineer, noise analyst/specialist). Report directly to the Project Manager.

2.3.2 Recognized Experts

The use of recognized experts on the monitoring team is required to ensure compliance with scientific and engineering mitigation measures. The mitigation monitoring team's recognized experts assess compliance with required mitigation measures, and recognized experts from responsible agencies consult with the Project Manager regarding disputes.

2. Mitigation Monitoring Process

2.4 ARBITRATION RESOLUTION

If the mitigation monitor determines that a mitigation measure, in the opinion of the monitor, has not been implemented or has not been implemented correctly, the problem will be brought before the Project Manager for resolution. The decision of the Project Manager is final unless appealed to the City's Planning Director. The Project Manager will have the authority to issue stop-work order until the dispute is resolved.

2.5 ENFORCEMENT

Public agencies may enforce conditions of approval through their existing police power, using stop-work orders, fines, infraction citations, or in some cases, notice of violation for tax purposes.

2. Mitigation Monitoring Process

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3. Mitigation Monitoring Requirements

3.1 PRE-MITIGATION MEETING

A pre-monitoring meeting will be scheduled to review mitigation measures, implementation requirements, schedule conformance, and mitigation monitoring committee responsibilities. Committee rules are established, the entire mitigation monitoring program is presented, and any misunderstandings are resolved.

3.2 CATEGORIZED MITIGATION MEASURES/MATRIX

Project-specific mitigation measures have been categorized in matrix format, as shown in Table 3-1, *Mitigation Monitoring Requirements*. The matrix identifies the environmental factor, specific mitigation measures, schedule, and responsible monitor. The mitigation matrix will serve as the basis for scheduling the implementation of, and compliance with, all mitigation measures. Mitigation measures from the Original Project, as well as mitigation measures from the Original Project that have been updated for the Modified Project, are highlighted in blue.

3.3 IN-FIELD MONITORING

Project monitors and technical subconsultants shall exercise caution and professional practices at all times when monitoring implementation of mitigation measures. Protective wear (e.g. hard hat, glasses) shall be worn at all times in construction areas. Injuries shall be immediately reported to the mitigation monitoring committee.

3.4 DATA BASE MANAGEMENT

All mitigation monitoring reports, letters, and memos shall be prepared utilizing Microsoft Word software on IBM-compatible PCs.

3.5 COORDINATION WITH CONTRACTORS

The construction manager is responsible for coordination of contractors and for contractor completion of required mitigation measures.

3.6 LONG-TERM MONITORING

Long-term monitoring related to several mitigation measures will be required, including fire safety inspections. Post-construction fire inspections are conducted on a routine basis by the City of Wildomar Fire Department.

3. Mitigation Monitoring Requirements

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3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
5.1 AESTHETICS				
Mitigation Measure 5.1-3A New lights would be situated and arranged so that no direct beam would leave the project site and no lighting would be directed to Planning Area 3, the conservation area. Luminaries shall be provided with filtering louvers and hoods. During installation, the luminaries shall be aimed and corrected by a field crew to aim the lights away from viewers. Light fixtures installed shall be designed and constructed so that 90 percent of light rays emitted by the fixture are projected below the horizontal plane passing through the lowest point of the shield.	Construction Contractor, Project Applicant	During Construction and Operational Activities	City of Wildomar Planning Department	
Mitigation Measure 5.1-3B Onsite buildings shall use low-reflective glass and building materials to keep daytime glare to a minimum.	Construction Contractor	During Construction Activities	City of Wildomar Planning Department	
Mitigation Measure 5.1-3C All exterior lights shall be shielded where feasible and focused to minimize spill light into the night sky or adjacent properties in accordance with <i>Wildomar Municipal Code Chapter 8.64</i> County Ordinance No. 655, Zone B, restrictions on onsite lighting.	Construction Contractor, Project Applicant	During Construction and Operational Activities	City of Wildomar Planning Department	
Mitigation Measure 5.1-3D New exterior lighting used for security purposes in the evening would be limited to low wattage, energy-conserving night lighting.	Construction Contractor, Project Applicant	During Construction and Operational Activities	City of Wildomar Planning Department	
Mitigation Measure 5.1-3E Outdoor lighting that conforms <i>with Wildomar Municipal Code Chapter 8.64</i> to Ordinance No. 655 shall be shown on electrical plans submitted prior to the issuance of building permit and shall be reviewed and approved by the Building and Safety Department. Prior to final building inspection, outdoor lighting shall be inspected by the Building and Safety Department to ensure compliance with the approved lighting plan.	Construction Contractor	Prior to Issuance of Building Permit	City of Wildomar Planning Department	
Mitigation Measure 5.1-3F Landscaping shall be installed per the approved plan and inspected by the Planning Department prior to Final Building Inspection.	Construction Contractor	Prior to Final Building Permit	City of Wildomar Planning Department	

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
5.2 AIR QUALITY				
Mitigation Measure 5.2-2A The property owner/developer shall implement standard mitigation measures in accordance with South Coast AQMD Rules 402 and 403 to control fugitive dust emissions and ensure that nuisance dust conditions do not occur during construction. In addition to the standard measures, the property owner/developer shall implement supplemental measures as feasible to reduce fugitive dust emissions to the extent feasible during construction operations, in addition to mitigation measures to reduce construction-related emissions of NO _x , PM ₁₀ , and VOCs. To assure compliance, the County shall verify compliance with these measures during normal construction site inspections. The measures to be implemented are listed below: <ul style="list-style-type: none"> ○ Apply soil stabilizers to inactive areas ○ Replace ground cover in disturbed areas quickly ○ Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph ○ Water the haul route and exposed surfaces three times per day ○ Use of construction equipment with low emission factors and high energy efficiency where possible 	Construction Contractor, Project Applicant	During Construction Activities	City of Wildomar Planning Department	

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<ul style="list-style-type: none"> ○ Perform regulatory scheduled engine maintenance (off-site) to minimize equipment emissions ○ Use of electric- or diesel-powered equipment rather than gasoline powered engines where feasible 				
Mitigation Measure 5.2-2B The developer shall use zero Volatile Organic Compounds (VOC) content architectural coatings during the construction of the project to the maximum extent feasible. Use of Zero-VOC paints assumes no more than 100 gram/liter of VOC.	Project Applicant, Construction Contractor	During Construction Activities	City of Wildomar Planning Department	
AQ-1 During construction activities, the construction contractor(s) shall limit the hauling of soil generated from grading/excavation activities to a maximum of 134 one-way soil haul trips per day assuming 16 cubic yard trucks are used; or 675 one-way soil haul trips if double haul trucks with a 30 cubic yard capacity is used; and assuming a one-way haul distance of 65 miles). The developer is required to find an export site within a 65-mile radius, and if one cannot be located, then the truck trips per day will need to be reduced to ensure impacts remain less than significant. Haul trucks with engines that are 2010 or newer shall be used for soil hauling activities. These requirements shall be noted on all construction management plans and verified by the City of Wildomar Building & Safety Department prior to issuance of any construction permits and during the soil-disturbing phases.	Construction Contractor	During Construction Activities	City of Wildomar Planning Department	
8.3 CULTURAL RESOURCES				
Mitigation Measure 5.4.2A Prior to the issuance of any grading permit, the project applicant shall provide written evidence to the County of Riverside that the applicant has retained a qualified archaeologist, who meets the Secretary of the Interior's Standards for archaeologists, to monitor construction activities in all cases that disturb the ground surface. A Registered	Project Applicant, Registered Professional Archaeologist	Prior to Issuance of Grading Permit	City of Wildomar Planning Department	

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
Professional Archaeologist (RPA) should, at minimum, supervise any monitoring activities. Special care/observation should be given during excavation activities within the immediate vicinity of the four structural remains. Should any subsurface cultural resources be encountered, the archaeological monitor shall have the authority to halt grading activities until uncovered resources are evaluated and a determination of significance is made. If prehistoric resources are encountered, the Pechanga Tribe, the project applicant and the County of Riverside shall evaluate the significance of the resources and if appropriate, shall determine appropriate treatment and mitigation of the resources. If historic artifacts are recovered, any eligibility testing and/or determination of additional mitigation should be done in consultation with the Pechanga Tribe.				
Mitigation Measure 5.4.2B The applicant must retain a monitor from the Pechanga Tribe. Tribal monitors from the Pechanga Band of Luiseno Indians shall be allowed to monitor all grading, excavation and ground-breaking activities, including further surveys, to be compensated by the project applicant/developer. The Pechanga Tribe monitors will have the authority to temporarily stop and redirect grading activities to evaluate the significance of any archeological resources discovered on the property, in conjunction with the project archeologist and the County of Riverside.	Project Applicant, Pechanga Tribal Monitor(s)	During Ground-Disturbing Activities	City of Wildomar Planning Department	
8.4 GEOLOGY AND SOILS				
Mitigation Measure 5.5-2A The project shall include a 5- to 10-foot-thick zone of compacted fill below the slab and footings. This mitigation measure shall be identified in the grading plan and then verified in the field as each stage of construction occurs. Implementation of the proposed mitigation will not cause any additional area to be disturbed on the	Construction Contractor	During Grading Activities	City of Wildomar Planning Department	

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
site or any additional environmental impacts, other than additional equipment excavation and compaction to achieve high densities of compacted material.				
Mitigation Measure 5.5-2B The project shall remove and replace all upper fills/disturbed soils with properly compacted fills.	Construction Contractor	During Construction Activities	City of Wildomar Planning Department	
Mitigation Measure 5.5-2C Any vegetation shall be removed and hauled from proposed grading areas prior to the start of grading operations. Existing vegetation shall not be mixed into the soils. Any removed soils may be reutilized as compacted fill, once deleterious and oversized (greater than eight inches) materials have been removed.	Construction Contractor	Prior to Grading Activities	City of Wildomar Planning Department	
Mitigation Measure 5.4-4A Prior to the issuance of a grading permit, a qualified paleontologist will be retained to supervise construction monitoring. Should any paleontological resources be uncovered, the paleontologist shall have the authority to temporarily divert grading away from exposed fossils in order to professionally and efficiently recover the fossil specimens and collect associated data. If paleontological resources are uncovered, the paleontological monitor shall file a report with the Planning Department documenting any paleontological resources that are found during the course of site grading activities. If paleontological resources are recovered they should be sent to the San Bernardino County Museum for curation.	Qualified Paleontologist	Prior to Issuance of Grading Permit	City of Wildomar Planning Department	
8.5 HAZARDS AND HAZARDOUS MATERIALS				
Mitigation Measure 5.6-1A Prior to commencement of grading activities, subsurface assessment in the form of trenching would be required in two areas identified as "suspected fill" near the north/central and central portions of the project site for the presence of hazardous materials. If hazardous materials are unearthed during trenching activities,	Construction Contractor	Prior to Grading Activities	City of Wildomar Planning Department	

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
hazardous materials shall be disposed of in accordance with local, state, and federal regulations.				
Mitigation Measure 5.6-1B All spills or leakage of petroleum products during construction activities shall immediately be contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations regarding the cleanup and disposal of the contaminant released. The contaminated waste shall be collected and disposed of at an appropriately licensed disposal or treatment facility.	Construction Contractor	During Construction Activities	City of Wildomar Planning Department	
8.9 TRIBAL CULTURAL RESOURCES				
TRI-1: Inadvertent Archaeological Find If during ground disturbance activities, unique cultural resources are discovered that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to project approval, the following procedures shall be followed. Unique cultural resources are defined, for this condition only, as being multiple artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance as determined in consultation with the Native American Tribe(s). a. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the archaeologist, the tribal representative(s) and the Planning Director to discuss the significance of the find. b. At the meeting, the significance of the discoveries shall be discussed and after consultation with the tribal representative(s) and the archaeologist, a decision shall be made, with the concurrence of the Planning Director, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.	Project Applicant, Registered Professional Archaeologist, Tribal Representative(s)	During Ground Disturbing Activities	City of Wildomar Planning Department	

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>c. Grading of further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal monitors if needed.</p> <p>d. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition.</p> <p>e. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the project archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.</p> <p>f. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the Planning Director for decision. The City's Planning Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources,</p>				

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe. Notwithstanding any other rights available under the law, the decision of the City Planning Director shall be appealable to the City Planning Commission and/or City Council.				
<p>TRI-2: Cultural Resources Disposition</p> <p>In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:</p> <p>a. One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Wildomar Planning Department:</p> <p>i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.</p> <p>ii. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods and</p>	Project Applicant, Registered Professional Archaeologist, Tribal Representative(s)	During Grading Activities	City of Wildomar Planning Department	

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the City under a confidential cover and not subject to Public Records Request.</p> <p>iii. If preservation in place or reburial is not feasible then the resources shall be curated in a culturally appropriate manner at 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 City. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human</p>				

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV monitoring report.</p>				
<p>TRI-3: Archaeologist Retained</p> <p>Prior to issuance of a grading permit the project applicant shall retain a Riverside County qualified Registered Professional Archaeologist (RPA), to monitor all ground disturbing activities in an effort to identify any unknown archaeological resources.</p> <p>The Registered Professional Archaeologist and the Tribal monitor(s) shall manage and oversee monitoring for all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition and etc. The Registered Professional Archaeologist and the Tribal monitor(s), shall independently have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with any required special interest or tribal monitors.</p> <p>The developer/permit holder shall submit a fully executed copy of the contract to the Planning Department to ensure compliance with this condition of approval. Upon verification, the Planning Department shall clear this condition.</p> <p>In addition, the Registered Professional Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a Cultural Resources Management Plan (CRMP) in consultation pursuant to the definition in AB 52 to address the</p>	Registered Professional Archaeologist	Prior to Issuance of a Grading Permit	City of Wildomar Planning Department	

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting tribe is defined as a tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB 52 consultation process, and has completed AB 52 consultation with the City as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include:</p> <ul style="list-style-type: none"> a. Project grading and development scheduling; b. The Project archaeologist and the Consulting Tribes(s) shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new construction personnel that will conduct earthwork or grading activities that begin work on the Project following the initial Training must take the Cultural Sensitivity Training prior to beginning work and the Project archaeologist and Consulting Tribe(s) shall make themselves available to provide the training on an as-needed basis; 				

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
c. The protocols and stipulations that the contractor, City, Consulting Tribe(s) and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.				
TRI-4: Native American Monitoring (Pechanga)	Tribal monitor(s) shall be required on-site during all ground-disturbing activities, including grading, stockpiling of materials, engineered fill, rock crushing, etc. The land divider/permit holder shall retain a qualified tribal monitor(s) from the Pechanga Band of Luiseno Indians. Prior to issuance of a grading permit, the developer shall submit a copy of a signed contract between the above-mentioned Tribe and the land divider/permit holder for the monitoring of the project to the Planning Department and to the Engineering Department. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist.	Pechanga Tribal Monitor(s)	During Ground-Disturbing Activities	City of Wildomar Planning Department
TRI-5: Native American Monitoring (Soboba)	Tribal monitor(s) shall be required on-site during all ground-disturbing activities, including grading, stockpiling of materials, engineered fill, rock crushing, etc. The land divider/permit holder shall retain a qualified tribal monitor(s) from the Soboba Band of Luiseno Indians. Prior to issuance of a grading permit, the developer shall submit a copy of a signed contract between the above-mentioned Tribe and the land divider/permit holder for the monitoring of the project to the Planning Department and to the Engineering Department. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist.	Soboba Tribal Monitor(s)	During Ground-Disturbing Activities	City of Wildomar Planning Department
TRI-6: Archaeology	Prior to final inspection, the developer/permit holder shall prompt the Project Archeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV	Registered Professional Archaeologist	Prior to Final Inspection	City of Wildomar Planning Department

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
Report - Phase III and IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Planning Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the Eastern Information Center (EIC) at the University of California Riverside (UCR) and one (1) copy shall be submitted to the Consulting Tribe(s) Cultural Resources Department(s).				
TRI-7: No-Build Easement or Similar Instrument In the event that Native American artifacts are found and buried within the project vicinity, a no-build easement, or similar legal instrument, shall be used to preclude future development from taking place on the reburial site(s).	Construction Contractor, Project Applicant	During Construction Activities	City of Wildomar Planning Department	

4. Mitigation Monitoring Reports

Mitigation monitoring reports are required to document compliance with the Mitigation Monitoring Program and to dispute arbitration enforcement resolution. Specific reports include:

- Field Check Report
- Implementation Compliance Report
- Arbitration/Enforcement Report

4.1 FIELD CHECK REPORT

Field check reports are required to record in-field compliance and conditions.

4.2 IMPLEMENTATION COMPLIANCE REPORT

The Implementation Compliance Report (ICR) is prepared to document the implementation of mitigation measures on a phased basis, based on the information in Table 3-1. The report summarizes implementation compliance, including mitigation measures, date completed, and monitor's signature.

4.3 ARBITRATION/ENFORCEMENT REPORT

The Arbitration/Enforcement Report (AER) is prepared to document the outcome of arbitration committee review and becomes a portion of the ICR.

4. Mitigation Monitoring Reports

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5. Community Involvement

Monitoring reports are public documents and are available for review by the general public. Discrepancies in monitoring reports can be taken to the arbitration committee by the general public.

5. Community Involvement

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6. Report Preparation

6.1 LIST OF PREPARERS

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6. Report Preparation

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