

**MASON MOTORSPORTS**  
**PLANNING APPLICATION No. 2021-37**

Industrial Design Review No. 2021-06  
Zone Change No. 2021-03

**CALIFORNIA ENVIRONMENTAL QUALITY ACT**  
**(DRAFT) ADDENDUM TO EIR SCH #2005121019**

Prepared By:

**CITY OF LAKE ELSINORE**

130 South Main Street  
Lake Elsinore, CA 92530

Applicant:

**AYLI, LP**

1000 Pioneer Way  
El Cajon, CA 92020

Project Location:

**Collier Avenue & Chaney Street**

APN:

**377-430-016**

## TABLE OF CONTENTS

Table of Contents.....	2
1.0 Introduction .....	3
1.1 Purpose .....	3
1.2 California Environmental Quality Act Overview.....	3
1.3 Intended Use .....	2
1.4 Scope of Environmental Analysis.....	5
2.0 Project Description .....	5
2.1 Location and Setting.....	5
2.2 Proposed Activities .....	9
3.0 Environmental Checklist .....	9
3.1 Background .....	9
3.2 Environmental Factors Potentially Affected.....	9
4.0 Environmental Analysis.....	10
4.1 Aesthetics.....	10
4.2 Agricultural and Forestry Resources .....	13
4.3 Air Quality.....	14
4.4 Biological Resources.....	18
4.5 Cultural and Tribal Cultural Resources .....	24
4.6 Energy .....	27
4.7 Geology and Soils .....	29
4.8 Greenhouse Gas Emissions.....	33
4.9 Hazards and Hazardous Materials .....	35
4.10 Hydrology and Water Quality .....	39
4.11 Land Use Planning .....	42
4.12 Mineral Resources .....	43
4.13 Noise .....	44
4.14 Population and Housing .....	47
4.15 Public Services.....	49
4.16 Recreation .....	51
4.17 Transportation .....	53
4.18 Utilities and Service Systems .....	56
4.19 Wildfire .....	60
5.0 References.....	61

## **1.0 Introduction**

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### **1.1 Purpose**

This document is an Addendum to the certified General Plan Environmental Impact Report, State Clearinghouse No. 2005121019 (GP EIR) and has been prepared to evaluate the potential environmental effects resulting from the proposed rezoning and development associated with the Mason Motorsports Warehouse in the City of Lake Elsinore (City). The warehouse would involve the rezoning of the warehouse site from C-M (Commercial Manufacturing) to M-1 (Limited Manufacturing) in conjunction with a private development proposal to construct a two-story, 25,449 sq. ft. industrial building, a parking area with 51 spaces and two loading spaces, and 16,803 sq. ft. of landscaping on a vacant 1.5-acre parcel in the City's Business District (hereinafter, collectively the "Activity."). A complete description of the Activity is provided in Section 2.0 of this document. The Activity requires City approvals including a Zone Change and Industrial Design Review. The City is the lead agency. (See CEQA Guidelines §15164(a).)

The proposed rezoning is consistent with the current General Plan designation of the proposed development site and will not increase the overall development intensity permitted on the lot. The environmental effects resulting from the original land use designation of the Activity site and adoption of applicable general plan goals and policies applying to future physical development of the City and its surrounding areas were analyzed in the GP EIR certified by the City in December 2011. The GP EIR was prepared as a programmatic-level document to evaluate the potential impacts of implementation of the 2011 Comprehensive Update to the City's General Plan.

This Addendum has been prepared to evaluate the environmental effects of the Activity in relation to the impacts previously identified and disclosed in the GP EIR.

### **1.2 California Environmental Quality Act Overview**

The California Environmental Quality Act (CEQA) is a state environmental law contained in Public Resources Code §§ 21000-21177 that applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The basic purposes of CEQA are (1) to inform governmental decision makers and the public about potential significant environmental effects of proposed activities, (2) identify ways that environmental damage can be avoided or significantly reduced, (3) require changes in projects through use of alternatives or mitigation measures when found to be feasible, and (4) disclose to the public the reasons why a government agency approved the project in the manner the agency chose if significant environmental effects are involved. (CEQA Guidelines §15002(a)).

Regulations and directives concerning implementation of CEQA are provided in Chapter 3 of Division 6 of the Title 14 of the California Code of Regulations (CEQA Guidelines). The CEQA Guidelines are binding on all public agencies in California including the City of Lake Elsinore. CEQA generally applies to governmental actions including activities directly undertaken by a governmental agency, activities financed in whole or in part by a governmental agency, or private activities which require approval from a government agency. At the heart of CEQA is the EIR, which is a public document that government agencies use to analyze the significant environmental effects and fulfill the basic purposes of CEQA. EIRs must be prepared for all projects (as defined CEQA) unless the project is exempt based on substantial evidence, or a Negative Declaration (ND) is adopted finding that there is no substantial evidence that a project may have a significant effect on the environment. (CEQA Guidelines §15002(b) to §15002(f)).

CEQA Guidelines §15006 provides several references to ways in which public agencies can use to reduce

delay and paperwork when performing CEQA review. Streamlining methods include eliminating repetitive discussions of the same issues by using EIR on programs, policies, or plans and tiering from reports of broad scope to those of narrow scope (§15152) and using incorporation by reference (§15150). “Tiering” refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and NDs on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project. (CEQA Guidelines §15152(a)).

Accordingly, lead agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including general plans, zoning changes, and development projects. (CEQA Guidelines §15152(b)). Pursuant to CEQA Guidelines §15162, when an EIR has been certified or an ND has been adopted for a project, no subsequent EIR is required unless a lead agency determines, on the basis of substantial evidence in 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 environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - d. 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.

In the event that any of the conditions described in Section 15162 would require the preparation of a subsequent EIR but only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation, a supplement to the EIR may be prepared. (CEQA Guidelines §15163.)

If none of the conditions described in CEQA Guidelines §15162 have occurred public agencies are authorized under CEQA Guidelines §15164 to consider and prepare an addendum to the previously certified EIR in order to comply with CEQA.

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### 1.3 Intended Use

This Addendum is an informational document that is intended to be used by City decision-makers, other responsible or interested agencies, and the general public of potential environmental effects of the Activity. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse environmental impacts.

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### 1.4 Scope of Environmental Analysis

In accordance with CEQA Guidelines §15168(c)(4), the City has prepared an Environmental Checklist to determine if any of the conditions set forth in CEQA Guidelines §15162 are met and whether the Activity would require a subsequent EIR or whether the Activity would result in new significant impacts or an increase in the severity of significant impacts not examined in the GP EIR. The Environmental Checklist provided in Section 4.0 includes an explanation and discussion of each given answer on the form. There are three possible responses to each of the environmental issues included in the checklist:

1. Items checked “*New Significant Impact*” indicate that substantial changes are proposed or substantial changes have occurred with respect to the circumstances under which the Activity is undertaken which will require major revisions to the GP EIR due to involvement of new significant environmental effects.
2. Items checked “*Increase in Severity of Previously Identified Significant Impact*” indicate that substantial changes are proposed in the Activity or substantial changes have occurred with respect to the circumstances under which the Activity is undertaken which will require major revisions to the GP EIR due to involvement of a substantial increase in the severity of significant effects previously identified in the GP EIR
3. Items checked “*New Information of Substantial Importance*” indicate that new information of substantial importance not known at certification of the GP EIR suggest that the Activity would cause new impacts or an increase in the severity of significant effects previously identified in the GP EIR that cannot feasibly be mitigated to less-than-significant levels

The Environmental Checklist and accompanying explanations of checklist answers (see Section 4.0) provide the information and analysis necessary to assess the environmental impacts of the Activity in relation to the impacts addressed in the GP EIR and determine if any additional environmental review for the Activity is warranted.

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## 2.0 Project Description

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### 2.1 Location and Setting

The Activity site consists entirely of one 1.56-acre parcel located on the westerly corner of the intersection of Collier Avenue and Chaney Street in the City of Lake Elsinore. The Activity site is located in a developed and urban setting and is surrounded by existing commercial and industrial development. A summary of the environmental setting is shown in Table 1 (APN: 377-430-016), and Figures 1 and 2 depict the location of the Activity site.

	EXISTING LAND USE	ZONING	GENERAL PLAN
Activity Site	Vacant	C-M (Commercial Manufacturing)	Business Professional
North	Commercial/Industrial	C-M (Commercial Manufacturing)	Business Professional
South	Industrial	M-1 (Limited Manufacturing)	Business Professional
East	Commercial	C-2 (General Commercial)	General Commercial
West	Vacant	C-M (Commercial Manufacturing)	Business Professional

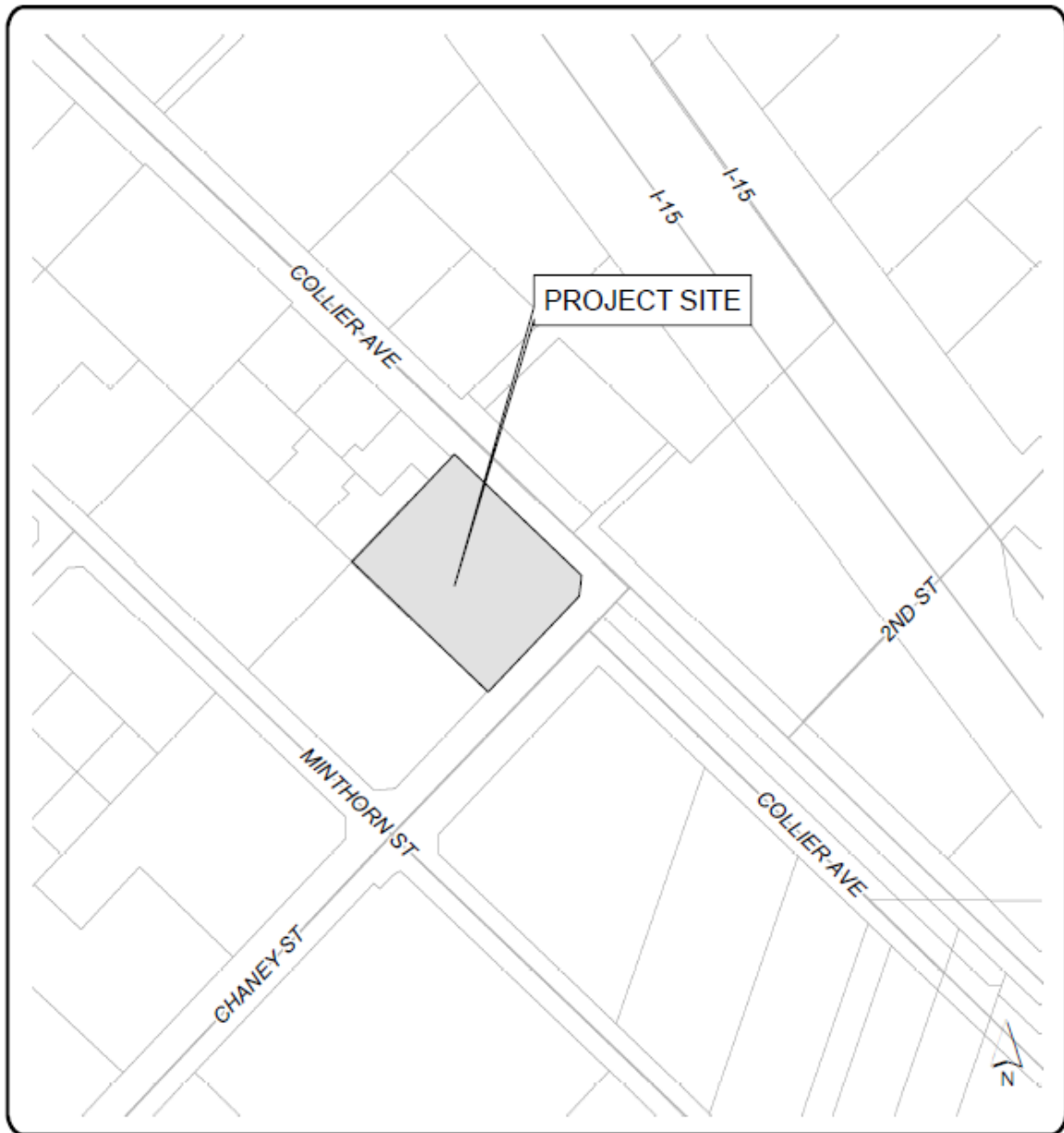
*Table 1 - Project Setting*

Planning Application No. 2021-37  
APN: 377-430-016  
AERIAL MAP



*Figure 1 - Aerial Map*

Planning Application No. 2021-37  
APN: 377-430-016  
VICINITY MAP



*Figure 2 - Vicinity Map*



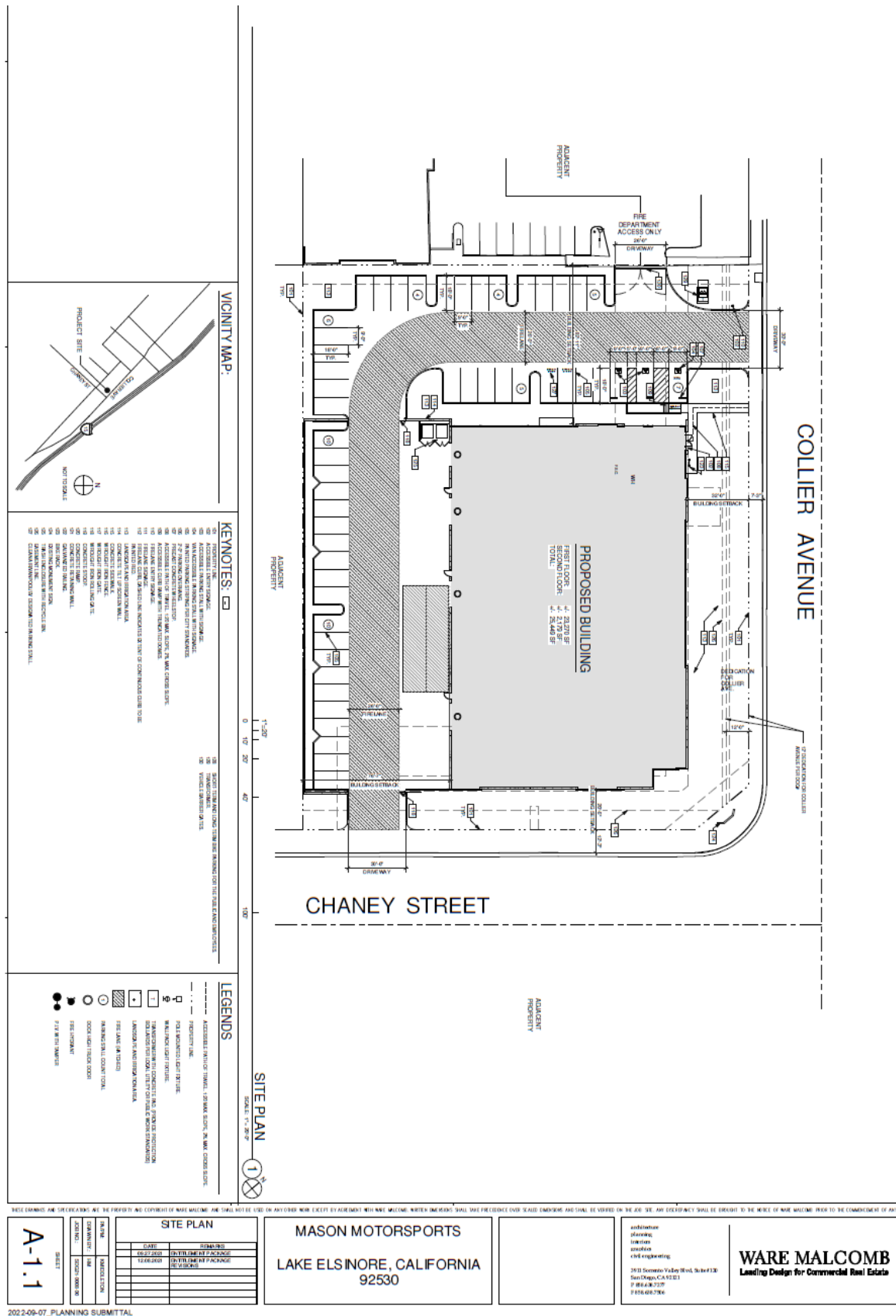


Figure 3 - Activity Site Plan

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## 2.2. Activities

The Activity involves Planning Application No. 2021-37 consisting of requests for approval of a Zone Change (ZC No. 2021-03) to rezone the Activity parcel from C-M (Commercial Manufacturing) to M-1 (Limited Manufacturing), and Industrial Design Review (IDR No. 2021-06) to construct one two-story, 25,449 square-foot industrial building with a 51-space parking area including two loading spaces and 16,803 sq. ft. of landscaped area. Construction would also involve associated off-site improvements including public right-of-way improvements abutting the Activity site and minor utility extensions required to serve the new development. Access to the new development would be provided by one full-width driveway along Collier Avenue and an emergency access driveway along Chaney Street. The Activity site plan is shown in Figure 3.

The purpose of the rezoning application is to allow the new building to be used as an off-road vehicle manufacturing facility, a type of use which is not permitted in the C-M district but is permitted in the M-1 district. The current General Plan land use designation of the parcel is Business Professional. The M-1 district is compatible with the Business Professional designation as specified in General Plan Appendix B. In the Business Professional designation, the Floor Area Ratio (FAR) shall not exceed 0.45. Hence, the proposed rezoning does not necessitate an amendment to the General Plan nor does it change the overall development intensity allowed on the Activity site.

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## 3.0 Environmental Checklist

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### 3.1 Background

**Title:** Mason Motorsports

**Lead Agency Name and Address:** City of Lake Elsinore, 130 S. Main Street, Lake Elsinore, CA 92530

**Contact Person and Phone Number:** Kevin Beery, Associate Planner; (951) 674-3124 ext. 805

**Sponsor:** AYLI, LP

**General Plan Designation:** Business Professional

**Current Zoning:** C-M (Commercial Manufacturing)

**Proposed Zoning:** M-1 (Limited Manufacturing)

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### 3.2 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this Activity, involving at least one impact that is a potentially significant impact as indicated by the checklist and environmental analysis provided in Section 4.

- |   |  |
|---|--|
| <input type="checkbox"/> Aesthetics                             | <input type="checkbox"/> Land Use and Planning         |
| <input type="checkbox"/> Agriculture and Forestry Resources     | <input type="checkbox"/> Mineral Resources             |
| <input type="checkbox"/> Air Quality                            | <input type="checkbox"/> Noise                         |
| <input type="checkbox"/> Biological Resources                   | <input type="checkbox"/> Population and Housing        |
| <input type="checkbox"/> Cultural and Tribal Cultural Resources | <input type="checkbox"/> Public Services               |
| <input type="checkbox"/> Energy                                 | <input type="checkbox"/> Recreation                    |
| <input type="checkbox"/> Geology/Soils                          | <input type="checkbox"/> Transportation                |
| <input type="checkbox"/> Greenhouse Gas Emissions               | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Hazards and Hazardous Materials        | <input type="checkbox"/> Wildfire                      |
| <input type="checkbox"/> Hydrology and Water Quality            |  |

## 4.0 Environmental Analysis

### 4.1 Aesthetics

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the Activity:				
a) Have a substantial adverse effect on a scenic vista?	pp. 3.3-27 to 3.3-40	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	pp. 3.3-40 to 3.3-41	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with applicable zoning and other regulations governing scenic quality?	pp. 3.3-41 to 3.3-45	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	pp. 3.3-45 to 3.3-49	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### (a) Have a substantial adverse effect on a scenic vista?

##### *GP EIR Analysis:*

The GP EIR identifies various scenic vistas including views of Lake Elsinore, hillsides and mountains, and public vantage points including I-15, SR-74, lakeside recreation areas, and Diamond Stadium. The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to scenic vistas upon adherence to MM Aesthetics 1, which requires future development projects to prepare visual simulations demonstrating compliance with the applicable GPU goals and policies.

##### *Activity-Specific Analysis:*

The proposed development site is located on the westerly corner of the intersection of Collier Avenue and Chaney Street within a flat area primarily surrounded by existing industrial and commercial development. The height of the proposed building is 38'-0" above finished grade, which is less than the maximum building height permitted by regulations of the existing and surrounding zoning districts. Furthermore, the proposed rezoning from C-M to M-1 would modify the existing zoning regulations applying to the parcel by decreasing the maximum allowed overall building height allowed from 45'-0" to 40'-0". The Activity would therefore decrease potential building height on the Activity site and thus reduce the potential for on-site development to obstruct viewsheds.

The proposed development would not obscure view of scenic resources from scenic vistas as identified in the GP EIR. The nearest identified scenic vista is the I-15 right-of-way approximately 0.12 miles to the northeast.

However, the Activity site is not visible from the I-15 due to the presence of earthen berms which directly obstruct view of the Activity site and its vicinity from the I-15. The nearest hillside areas are located approximately 0.5 miles to the southwest in the County Club Heights district. Furthermore, the GP EIR assumes that implementation of the Business District Plan would enhance visual quality of the area. In satisfaction of MM Aesthetics 1, the applicant has submitted visual renderings showing that the new building would feature a high-quality architectural design and blend in with surrounding development.

For the reasons described above, the Activity would have no new impacts on scenic vistas. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

**(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to natural and historic scenic resources upon adherence to the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) and General Plan Open Space and Resource Protection and Preservation Policies, and that no mitigation measures are required. In addition, there are no highways in Lake Elsinore officially designated in the State Scenic Highway System, although SR-74 is eligible for listing.

*Activity-Specific Analysis*

The Activity site is located approximately 0.44 miles from SR-74 at its intersection with Collier Avenue and Central Avenue. The Activity site is vacant and consists entirely of previously disturbed land. Furthermore, the Activity site is void of any scenic resources including trees, rock outcroppings and historic buildings.

For the reasons described above, the Activity would have no new impacts on scenic resources. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

**(c) Conflict with applicable zoning and other regulations governing scenic quality?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to the existing visual character of the City upon adherence to General Plan Resource Protection and Preservation Policies, and that no mitigation measures are required.

*Activity-Specific Analysis:*

The Activity plans comply with applicable zoning regulations including size, height and bulk of structures as well as General Plan policies governing scenic quality. The Activity will provide water-efficient and drought-resistant landscaping in street-facing yards and on-site parking areas. Furthermore, Activity landscaping will be required to comply with Municipal Code Chapter 19.08 and the City's Landscaping Guidelines. All off-site improvements including landscaping and streetscape elements will be required comply with City standards. Standard permit conditions have been added requiring the Activity to comply with City landscaping standards and review procedures in addition to City standards.

For the reasons described above, the Activity would have no new impacts on the visual character of the project

site and surroundings. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

**(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

*GP EIR Analysis*

The GP EIR identifies that new development has the potential to create new sources of light and glare such as buildings and automobiles. Accordingly, new development has the potential to increase the amount of light and glare which could adversely affect daytime or nighttime views in the area. The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts upon adherence to General Plan Policy 12.2 and City Municipal Code Section 17.148.110, and that no mitigation measures are required.

*Activity-Specific Impacts*

The Activity involves a proposal to develop a vacant parcel with a new building consisting of potentially reflective surfaces such as glass windows and metallic components. New sources of glare resulting from the Activity would include these reflective building surfaces as well as automobiles parked on the Activity site. However, the proposed building surfaces consist primarily of non-reflective surfaces including concrete walls, concrete roof, pavement, and landscaped area. Furthermore, the parking area and landscaped areas are designed to be planted with shade trees to help promote absorption of sunlight and minimize reflection. The Activity is not expected to produce a substantial amount of glare that would adversely affect the surrounding area. There are no unique or hazardous design aspects that would warrant additional environmental review. Therefore, the Activity would result in less-than-significant glare impacts.

Additionally, new sources of lighting resulting from the Activity include interior and exterior building lighting and use of on-site lighting in the parking area. However, the GP EIR holds that adverse lighting impacts would be avoided through compliance with General Plan Policy 12.2 and City Municipal Code Section 17.148.110, which requires lighting of non-residential developments to be minimized and downcast to avoid spill-over effects, avoid unnecessary light pollution, and minimize impacts to dark skies particularly for the purpose of preserving nighttime views for the Mt. Palomar Observatory. Standard mitigation measures have been added requiring the Activity to comply with GP policies and City Municipal Code provisions.

For the reasons described above, the Activity would have less-than-significant impacts on the visual character of the Activity site and surroundings. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

## 4.2 Agriculture and Forestry Resources

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the Activity:				
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?	pp. 3.1-41 to 3.1-42	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	pp. 3.1-41 to 3.1-42	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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))?	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	pp. 3.1-41 to 3.1-42	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The GP EIR determined that impacts to agricultural resources would be less-than-significant primarily due to minimal amount of agricultural land occurring within the City and its planned conversion to urban use. The GP EIR scope did not include forestry resources since they are not present in the City or its sphere of influence. Furthermore, the Activity site is void of agricultural or forestry resources and is zoned for urban uses.

For the reasons described above, the Activity would have no impacts on agricultural or forestry resources. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

## 4.3 Air Quality

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the Activity:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	pp. 3.6-24 to 3.6-34	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Activity region is non-attainment under an applicable federal or state ambient air quality standard?	pp. 3.6-24 to 3.6-34	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	pp. 3.6-34 to 3.6-35	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	p. 3.6-35	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following review of potential air quality impacts is based on the Air Quality Conformity Assessment prepared for the Activity by Investigative Science and Engineering dated October 12, 2022 (included as Appendix A). The purpose of the Air Quality Conformity Assessment is to assess the potential of air quality impacts resulting from construction and operation and to evaluate compliance with applicable criteria pollutant thresholds set by the South Coast Air Quality Management District (SCAQMD). A summary of the Air Quality Conformity Assessment is provided below:

- Activity construction sources of air pollutants include construction vehicle emissions, fugitive dust emissions, and emissions from architectural coatings
- Activity operational sources of air pollutants include vehicular traffic generation, small gasoline engine emission sources, and natural gas emissions
- The Activity would not exceed SCAQMD air quality regional or localized significance thresholds for construction and operation activities, toxic air contaminants, or ambient air quality standards for criteria pollutants

### 3(a) Conflict with or obstruct implementation of the applicable air quality plan?

**OR**

### 3(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Activity region is non-attainment under an applicable federal or state ambient air quality standard?

#### *GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan construction activities would result in less-than-significant air quality impacts due to conflicts with an air quality plan or by cumulatively increasing emissions of criteria pollutants upon adherence to MM Air Quality 1, which requires that individual projects demonstrate avoidance of significant impacts from construction activities through implementation of regulatory requirements and provisions of the General Plan. However, the GP EIR concludes that implementation of the

General Plan operational activities would result in significant and unavoidable air quality impacts. The GP EIR identifies MM Air Quality 2 which requires individual projects to demonstrate a reduction in impacts on air quality from operational emissions through implementation of General Plan and regulatory requirements to the greatest extent practicable.

**Activity-Specific Analysis:**

In satisfaction of MM1 and MM2, the Air Quality Conformity Assessment was prepared to assess whether construction or operational activities would violate applicable air quality standards or result in a cumulatively considerable net increase of criteria pollutants for which the region is in non-attainment.

The Activity site is located in the South Coast Air Basin (SCAB) and is subject to the jurisdiction of SCAQMD. Pursuant to the Lewis-Presley Air Quality Management Act, SCAQMD is responsible for adopting regional air quality management plans, which are regional blueprints for achieving air quality standards. The current adopted version is the Final 2016 Air Quality Management Plan (AQMP). The purpose of the AQMP is to implement emission reduction strategies that will bring the SCAB into attainment with National Ambient Air Quality Standards (NAAQS) and State of California ambient air quality standards (CAAQS). The AQMP is developed in collaboration with the United States Environmental Protection Agency (EPA), the California Air Resources Board (CARB), and the Southern California Association of Governments (SCAG) and is based in part on the assumptions in the SCAG 2045 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) which relies on growth and build-out projections that are specified in local general plans. In general, individual projects that are consistent with the land use policies and assumptions of the General Plan may be presumed to substantially conform to the AQMP. Accordingly, since the Activity will not change the development density permitted on the parcel according to general plan, the Activity will not conflict with or obstruct the AQMP. Therefore, the Activity will cause no new impacts with regards to implementation of the AQMP.

Sources of potential emissions during Activity construction include use of construction vehicles and fugitive dust caused by disturbance of soil by equipment. Sources of potential emissions during Activity operation include vehicular traffic generation, on-site use of small gasoline engines (e.g., landscaping equipment), and natural gas utilization. In accordance with the findings of the Air Quality Conformity Assessment, Table 2 below shows that Activity construction and operational emissions would fall substantially below applicable standards.

Activity	Criteria Pollutant Emissions (lbs/day)					
	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	ROG
<b>Construction Grading (lbs/day)</b>						
Grading Vehicle Emissions	24.3	2.7	8.2	0.0	0.0	1.3
Surface Grading Dust	-	-	-	0.5	0.1	-
Powered Haulage Emission	0.0	0.3	0.0	1.8	0.4	0.0
<b>Total</b>	<b>24.3</b>	<b>3.0</b>	<b>8.2</b>	<b>2.3</b>	<b>0.5</b>	<b>1.3</b>
<b>Construction Building (lbs/day)</b>						
Architectural Coating Application	-	-	-	-	-	71.2
Unmitigated Total	-	-	-	-	-	71.2
<b>With Low VOC Paint Application</b>	-	-	-	-	-	<b>25.6</b>
<b>SCAQMD CONSTRUCTION THRESHOLD</b>	<b>550</b>	<b>100</b>	<b>150</b>	<b>150</b>	<b>55</b>	<b>75</b>
<b>Daily Activity Activity (lbs/day)</b>						
Vehicular Traffic Generation	7.6	1.5	0.0	0.0	0.0	0.1
Small Engine Utilization	0.3	0.0	0.0	0.0	-	0.0
Natural Gas Utilization	0.1	0.2	-	0.0	-	0.0
<b>Total</b>	<b>8.0</b>	<b>1.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.2</b>
<b>SCAQMD OPERATIONAL THRESHOLD</b>	<b>550</b>	<b>55</b>	<b>150</b>	<b>150</b>	<b>55</b>	<b>55</b>

*Table 2 – Air Pollutant Emissions Calculations*



Furthermore, according to the Air Quality Conformity Assessment, the Activity would not exceed applicable air quality standards including regional or localized significance thresholds set by SCAQMD. Any air pollutant emissions resulting from the Activity would be considered *de minimis* under applicable state or federal standards. Therefore, air quality effects would be negligible and less-than-significant.

For the reasons described above, the Activity would have less-than-significant impacts on the air quality impacts due to either potential air quality plan conflicts or violations with applicable standards. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

**(c) Expose sensitive receptors to substantial pollutant concentrations?**

**OR**

**(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in significant and unavoidable impacts due to exposing sensitive receptors to substantial pollutant concentrations, even with mitigation applied. The GP EIR identified MM Air Quality 5 which requires individual projects to demonstrate avoidance of significant impacts on air quality emissions associated with sensitive land uses. Furthermore, the GP EIR concludes that implementation of the General Plan would result in less-than-significant air quality impacts due to other emissions including those leading to odors upon adherence to SCAQMD Rule 402, which requires active control of potentially objectionable odors, and MM Air Quality 6, which requires that individual projects to be evaluated to determine their potential for creating potentially objectionable odors.

*Project-Specific Analysis:*

In satisfaction of MM Air Quality 5, the Air Quality Conformity Assessment was prepared to determine the significance of Activity air quality impacts resulting from exposing sensitive receptors to substantial pollutant concentrations or toxic substances. According to the Air Quality Conformity Assessment, the Activity would not have the potential to expose any receiving land use with pollutant concentrations exceeding the CAAQS set forth by CARB for sensitive receptors. Furthermore, there is no potential for significant carcinogenic impacts resulting from Activity construction. In accordance with the findings of the Air Quality Conformity Assessment, Table 3 shows calculations of the expected concentration of Activity emissions.

Criteria Pollutant	Pollutant Concentration (g/m <sup>3</sup> )	Pollutant Concentration (ppm)	Pollutant Risk Probability (percent risk per person for 70-year exposure)	Significant?
CO	87.57	0.0761	n/a	No
NO <sub>x</sub>	10.81	0.0058	n/a	No
SO <sub>x</sub>	29.62	0.0113	n/a	No
PM <sub>10</sub>	0.07	-	0.002%	No
PM <sub>2.5</sub>	0.07	-	n/a	No
ROG	4.59	-	n/a	No

*Table 3 – Pollutant Concentrations Calculations*

The nearest known sensitive receptor to the Activity site is a church ("Familia Nuevo Nacimiento") located at 575 Chaney Street, approximately 360 feet southwest of the Activity site. The maximum pollutant concentration is estimated to occur at a distance of approximately 413 feet away from the Activity site; however, the Activity will not result in a pollutant concentration in excess of thresholds at any distance from the Activity site. Therefore, the Activity will not expose sensitive receptors in the vicinity to substantial pollutant concentrations. Although not required to mitigate a significant effect, permit conditions have been added requiring the Activity to (a) comply with SCAQMD Rule 403 thereby requiring implementation of measures to minimize or avoid fugitive dust during construction, and (b) to utilize CARB compliant equipment during construction to minimize pollutant emissions.

Furthermore, the Activity does not involve special construction activities or unique operational features (such as an operation requiring ventilation) that would cause other emissions including those leading to odor. Although not required to mitigate a significant effect, permit conditions have been added requiring the Activity to comply with SCAQMD Rule 402 to ensure that the Activity will not cause excessive odors.

For the reasons described above, the Activity would have less-than-significant impacts on the air quality impacts due to exposing sensitive receptors or other emissions such as those leading to odor. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

## 4.4 Biological Resources

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the Activity:				
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?	pp. 3.8-46 to 3.8-48	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	pp. 3.8-48 to 3.8-50	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	pp. 3.8-48 to 3.8-50	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	pp. 3.8-51 to 3.8-52	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	pp. 3.8-52 to 3.8-53	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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?	pp. 3.8-53 to 3.8-55	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The following assessment of potential impacts to biological resources is based on the Biological Resources Letter Report prepared by RECON dated August 25, 2022 and the Burrowing Owl Focused Survey Results prepared by RECON dated April 8, 2022 (included as Appendix B) for the Activity. The purposes of the Biological Resources Letter Report and Burrowing Owl Focused Survey Results are to assess the potential effects of the Activity on biological resources and to ascertain the presence of burrowing owl individuals or activity in the Activity vicinity. A summary of the Biological Resources Letter Report and Burrowing Owl Focused Survey Results is provided below:

- The Activity site consists entirely of land disturbed by previous grading and discing.
- Based on a biological field survey conducted in January 2022, no sensitive plant or wildlife species were identified within the Activity boundary.
- Two wildlife species, burrowing owl and California horned lark, were determined to have a high potential to occur at the Activity site
- The Activity is not located inside or adjacent to any Criteria Area, Criteria Cell, or Conservation Area identified for conservation potential by the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP); however, portions of the Activity site are located within the MSHCP special survey area for burrowing owls. In accordance with the MSHCP, focused burrowing owl surveys were conducted in March and April 2022. No burrowing owl individuals or activity were detected during the surveys.
- The Activity complies with all applicable requirements of the MSHCP.
- No potential jurisdictional waters, including wetlands or non-wetland waters, were observed within or adjacent to the Activity boundary.

**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?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to candidate, sensitive or special status species upon adherence to MM Biological Resources 1 which requires that a project-specific analysis of plant and wildlife impacts and habitat impacts are completed in accordance with the MSHCP to determine the significant of impacts and identify mitigation measures if necessary.

*Activity-Specific Analysis:*

The Activity site has no value as habitat for endangered, rare or threatened vegetation communities except that there is a high potential for burrowing owls and California horned lark to occur within the Activity area. No candidate, sensitive, or special status vegetation or wildlife species were identified during surveys of the Activity site conducted by qualified biologists. Focused surveys were also conducted for burrowing owls in accordance with MSHCP survey area requirements, and no signs of burrowing owl individuals or activity were identified. Therefore, Activity construction would result in less-than-significant impacts to candidate, sensitive or special status species either directly or through habitat modifications. Although not required to mitigate significant impacts under CEQA, the Activity will be

required to comply with the following permit condition to ensure compliance with the MSHCP and avoid or minimize the potential for impacts to affected species in accordance with the recommendations provided in the Biological Resources Letter Report:

1. To remain in compliance with the Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code (CFGF), no direct impacts shall occur to any nesting birds, their eggs, chicks, or nests. If vegetation removal activities were to occur during the bird breeding season of February 1 to September 15, a qualified biologist will conduct pre-construction surveys no more than three days prior to the commencement of project activities to identify locations of nests. If nests or breeding activities are located on the project site, a qualified biologist shall establish a clearly marked appropriate exclusionary buffer or other avoidance and minimization measures around the nest. Avoidance and minimization measures shall be maintained until the young have fledged and no further nesting is detected. If no nesting birds are detected during the pre-construction survey, no further measures are required. A preconstruction survey report shall be submitted to the Community Development Department for review and approval prior to issuance of a grading or building permit.

For the reasons described above, the Activity would have less-than-significant impacts on candidate, sensitive, or special status species. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

**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?**

**OR**

**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?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to riparian habitat or protected wetlands upon adherence to MM Biological Resources 3 which requires that individual environmental review to be conducted for future development projects in order to identify any impacts on riparian areas and wetlands and imposition of adequate mitigation.

*Activity-Specific Analysis:*

According to the Biological Resources Letter Report, the Activity site is void of riparian/riverine areas, vernal pools, or jurisdictional waters based on observation and literature review. Therefore, the Activity would not result in impacts to riparian habitats or protected wetlands.

For the reasons described above, the Activity would have less-than-significant impacts on candidate, sensitive, or special status species. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

**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?**

#### *GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts upon adherence to MM Biological Resources 4, which requires pre-construction surveys to avoid impacts to avian resources during nesting season, and MM Biological Resources 5, which requires construction activities to be delayed if active nests are identified in the construction site vicinity.

#### *Activity-Specific Analysis*

Development of the Activity site would not interfere with the movement of any native resident or migratory fish or wildlife species. Furthermore, development of the Activity site would not interfere with any established native resident or migratory wildlife corridor or impede the use of native wildlife nursery sites. None of these resources occur within the Activity vicinity.

According to the Biological Resource Letter Report, direct impacts to nesting and migratory birds, including California horned lark, could potentially result if vegetation removal or grading within the Activity disturbance footprint activities are undertaken during the general avian breeding season (February 1 to September 15). These species are protected by California Fish and Game Code Section 3503.5, and direct impacts to nesting individuals would need to be avoided. In order to implement MM Biological Resources 4 and 5, the following permit conditions have been added to mitigate potential significant impacts to less-than-significant levels:

1. Not more than thirty days prior to construction activities that occur between February 1 and August 15 of any year, surveys for nesting bird species shall be conducted by a qualified biologist selected by the developer and approved by the City. If no active avian nests are identified on or within 250 feet of the limits of the construction area, up to the limits of the project site, no further mitigation is necessary. Alternatively, to avoid impacts, the City may allow individual projects the option of beginning construction after the previous breeding season for bird species has ended (after August 15) and before the next breeding season begins (before February 15).
2. If active nests for avian species are found within the construction footprint of any future project, construction activities shall be delayed within a minimum 250- foot buffer zone surrounding nests of other special-status avian species until the young have fledged. This buffer zone shall not extend beyond the project site. No action other than avoidance shall be taken without CDFW consultation.

For the reasons described above, the Activity would have less-than-significant impacts movement of native resident or migratory wildlife species. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

#### **e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

#### *GP EIR Analysis:*

The GP EIR identifies various local policies and ordinances protecting biological resources including the palm tree preservation program. However, there are no other local ordinances protecting biological resources, such as native oak trees, in areas outside of MSHCP jurisdiction. The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts upon adherence to the palm tree preservation program provided under City Municipal Code Chapter 5.116.

#### *Activity-Specific Analysis:*

According to the Biological Resources Letter Report, the Activity site is void of biological resources including palm trees or native oak trees based on observation and literature review. Therefore, the Activity would not

result in impacts to biological resources that are protected by local policy or ordinance.

For the reasons described above, the Activity would have less-than-significant impacts on biological resources such as trees protected by local policy or ordinance. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

**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?**

*GP EIR Analysis:*

As a signatory to the MSHCP, the City of Lake Elsinore is required to review all development projects having potential impacts on identified sensitive biological resources to ensure and maintain compliance with applicable provisions of the MSHCP. Furthermore, pursuant to City Municipal Code Chapter 19.04, the City implements the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) which requires the payment of an impact and mitigation fee. The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts on the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan, and that no mitigation measures are required.

*Activity Specific Analysis:*

The Activity site boundaries are not located in or adjacent to any Criteria Area, Criteria Cell, or Conservation Area identified for conservation potential under the MSHCP. Therefore, no area on the Activity site is required to be set-aside for conservation and special coordination with the Western Riverside Regional Conservation Authority (RCA) is not required. However, private development projects outside Criteria Areas are still subject to consistency with MSHCP policies including such as policies related to Riparian and Riverine Areas and Vernal Pools, Narrow Endemic Plant Species, Additional Survey Needs and Procedures, and Funding/Fee Issues.

The Activity site is consistent with the policies related to Riparian Riverine Areas and Vernal Pools, Narrow Endemic Plant Species, and Urban/Wildland Interface since these resources do not occur on or apply to the Activity site. The Activity site is located within the MSHCP survey area for burrowing owl. Therefore, focused burrowing owl protocol surveys were conducted by qualified biologists in accordance with RCA guidelines. Results of these focused surveys are detailed in the Burrowing Owl Focused Survey Results. No signs of burrowing owl individuals or activity were identified on-site or within the vicinity during the surveys. To avoid the take of burrowing owl surveys, a permit condition has been added to require pre-construction surveys for burrowing owls to ensure compliance with the MSHCP thereby avoiding potential impacts.

A standard permit condition will be added requiring payment of mitigation and impact fees in accordance with the SKR HCP made prior to issuance of construction permits for the Activity.

For the reasons described above, the Activity would have less-than-significant impacts on compliance with the provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

## 4.5 Cultural and Tribal Cultural Resources

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the Activity:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	pp. 3.2-36 to 3.2-41	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	pp. 3.2-41 to 3.2-48	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	pp. 3.2-49 to 3.2-50	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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 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 § 5024.1.	pp. 3.2-41 to 3.2-48	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following assessment of potential impacts to cultural and tribal cultural resources is based on the Phase 1 Cultural Resources Survey Report prepared by RECON dated August 30, 2022 (included as Appendix C) for the project. The purpose of the Phase 1 Cultural Resources Survey Report is to identify and record cultural resources within the project area based on a literature review and a field survey conducted by a qualified archaeologist. A summary of the Phase 1 Cultural Resources Survey Report is provided below:

- Based on a records search results from the Eastern Information Center, no cultural resources have been recorded within the project area
- Based on a field survey conducted by a professional archaeologist and a Pechanga tribe representative in August 2022, no significant or potentially significant prehistoric or historic cultural resources were observed



**a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?**

**OR**

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?**

**OR**

**d) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to historic or archaeological resources upon adherence to MM Cultural/Paleontological 1 through 8, which require tribal and archaeological monitoring, reporting, and preservation measures to be implemented for individual development projects to prevent impacts to unknown resources in case they are discovered during Activity construction.

*Activity-Specific Analysis:*

According to the Phase 1 Cultural Resource Survey Report, no prehistoric or historic cultural material was observed during a field survey of the Activity site. The Activity area has been disturbed by past agricultural ground disturbing activities, grading, and recent discing. Given past disturbances, the possibility of buried intact significant prehistoric or historic cultural resources being present within the Activity area is low. Furthermore, the Activity is consistent with all applicable General Plan Policies pertaining to Land Use, Cultural and Paleontological Resources, and Historic Preservation Policies. Therefore, the Activity would not result in impacts to known historical resources. MM Cultural/Paleontological Resources 1 through 8 will be added as permit conditions to mitigate the potential impacts to unknown historical, cultural or tribal cultural resources that may be discovered during Activity construction to less-than-significant levels.

For the reasons described above, the Activity would have less-than-significant impacts on historical, cultural or tribal cultural resources. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

**c) Disturb any human remains, including those interred outside of dedicated cemeteries?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to historic or archaeological resources upon adherence to MM Cultural/Paleontological 10 which requires that if human remains are encountered, certain procedures and notifications are to be implemented including notifying the Riverside County Coroner in case remains are discovered, ceasing disturbance activities until the origins of the remains have been identified, investigating whether the remains are Native American, and notifying the Native American Heritage Commission if necessary.

*Activity-Specific Analysis:*

According to the Phase 1 Cultural Resource Survey Report, there is no evidence that human remains are present in the Activity area. The Activity area has been disturbed by past agricultural ground disturbing activities, grading, and recent discing. Given past disturbances, the possibility of buried intact significant prehistoric or historic cultural resources being present within the Activity area is low. Furthermore, the Activity is consistent with all applicable General Plan Policies pertaining to Land Use, Cultural and Paleontological Resources, and Historic Preservation Policies. Therefore, the Activity would not result in impacts to known historical resources. MM Cultural/Paleontological Resources 10 will be added as a permit condition to mitigate any potential impacts to disturbance of human remains.

For the reasons described above, the Activity would have less-than-significant impacts on historical, cultural or tribal cultural resources. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

## 4.6 Energy

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**OR**

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

### *GP EIR Analysis:*

The GP EIR did not identify significant impacts specifically related to energy resources resulting from implementation of the General Plan, although discussion of energy usage was incorporated into the analysis of greenhouse gas impacts.

### *Activity-Specific Analysis:*

The Activity site is located in an existing developed, urban area that is currently served by utility electric and gas infrastructure (Southern California Edison and Southern California Gas Company). Construction of minor utility extensions would be necessary to serve the new development with off-site electric and gas utility lines. Given the relatively small scale of the proposed in-fill development, no new energy generation or distribution infrastructure would be necessary to serve the new development.

### Construction

During Activity construction, energy could be consumed in three general forms:

1. Petroleum-based fuels to power construction-related equipment including heavy machinery and vehicles used to transport crews and equipment to and from the building site
2. Electricity to provide temporary power for on-site work associated with building activities, and indirect use of electricity to power associated equipment such as water pumps for dust control
3. Energy to produce building materials including concrete, steel, glass and plastics

Activity construction is not expected to result in relatively wasteful, inefficient, or unnecessary consumption of energy resources and is expected to be comparable to similar construction projects with respect to size, duration, and type. Construction would not involve unusual or increased need for energy that would be wasteful, inefficient, or unnecessary. Therefore, Activity construction would result in less-than-significant impacts to energy consumption. In order to reduce the potential of wasteful and unnecessary consumption of

energy during Activity construction, a permit condition will be added requiring the Activity to comply with California Air Resources Board (CARB) Rule 2485 regulating idling of diesel-fueled equipment.

### Operation

During Activity operation, energy would be consumed in various forms including use of electricity, natural gas, and gasoline or diesel for motor vehicle trips. Operational energy use would include air conditioning, lighting, and running of machining equipment to produce manufactured goods including off-road vehicle components and parts. Given the relatively small scale of the facility, expected energy outputs for manufacturing processes would be typical. No new energy infrastructure would be required in order to operate the Activity. The energy used by vehicle trips generated by the new development would be negligible based on the proposed size, use, and its location within a developed, urban setting. Standard permit conditions have been added requiring the Activity to demonstrate compliance with Title 24 ("CalGreen") energy efficiency standards to ensure that the Activity will not exceed regulatory thresholds concerning energy consumption in newly constructed buildings.

Furthermore, the Activity is consistent with the City's Climate Action Plan (CAP) which provides mandatory measures to be implemented in individual projects to ensure compliance with the provisions of California AB 32 aimed at reducing greenhouse gas emissions. The Activity is consistent with the growth assumptions provided in the General Plan and therefore may be deemed consistent with the Climate Action Plan. Therefore, the Activity would not conflict with any plan adopted for renewable energy or energy efficiency purposes. Standard permit conditions have been added requiring the Activity to incorporate measures identified in the CAP.

For the reasons described above, the project would have less-than-significant energy impacts. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

## 4.7 Geology and Soils

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
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? ii) Strong seismic ground shaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides?	pp. 3.11-26 to 3.11-32	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	pp. 3.11-32 to 3.11-33	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	pp. 3.11-26 to 3.11-32	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	p. 3.11-33	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	p. 3.11-34	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	pp. 3.2-41 to 3.2-48	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following assessment of potential geologic and soils impacts is based on the Preliminary Geotechnical Investigation prepared by Construction Testing & Engineering dated August 3, 2021 (included as Appendix D) for the project. The purpose of the Preliminary Geotechnical Investigation is to perform a geotechnical engineering analysis of data collected from review of geologic and geotechnical literature as well as laboratory testing on soil samples taken from the proposed building site in order to evaluate potential geologic hazards

and provide preliminary design recommendations for the proposed construction. A summary of the Preliminary Geotechnical Investigation is provided below:

- The proposed construction is feasible from a geotechnical standpoint provided the preliminary recommendations in the report are incorporated into the design and construction of the Activity
- The site is not located within a State-designated Earthquake Fault Zone, no known active or potentially active fault traces underline or project toward the site. Thus, the potential for ground surface rupture occurring at the site is very low.
- The soils investigation revealed that the potential for deep liquefaction or seismic induced settlement is low but the potential for near-surface soils is potentially susceptible. Therefore, site preparation treatment measures are recommended to avoid or minimize potential for liquefaction impacts to the new building
- The topography of the site and its surroundings have a low susceptibility to landslides
- The on-site soils have a very low potential for expansion

**a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction or landslides?**

**OR**

**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?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts due to geology or soil conditions upon adherence to MM Geology and Soils 1, which requires individual projects to be consistent with public safety and welfare goals and policies relating to seismic activity, and MM Geology and Soils 2, which requires new construction to comply with the seismic design provisions for Seismic Zone 4 of the California Building Code (CBC).

*Activity-Specific Analysis:*

According to the Preliminary Geotechnical Report, the Activity would not expose people or structures to potential substantial adverse effects involving earthquake fault ruptures or landslides. The report identified that the near-surface alluvial soils create the potential for liquefaction if feasible preliminary design site preparation recommendations, including over excavating and compacting of the building pad, are not implemented. However, with project-level compliance with the Municipal Code and the CBC, the Activity would result in less-than-significant impacts. Standard permit conditions have been added requiring the Activity to comply with the applicable version of the CBC. Code compliance will be enforced through plan review and field inspections by the City Building Official and City Engineer.

For the reasons described above, the Activity would have less-than-significant impacts resulting from geology or soil conditions. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

**b) Result in substantial soil erosion or the loss of topsoil?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to soil erosion or loss of topsoil upon adherence to regulatory requirements of the National Pollutant Discharge Elimination System (NPDES) Permit, Storm Water Pollution Prevention Plan (SWPPP) and construction Best Management Practices (BMP), and that no mitigation measures are required.

*Activity-Specific Analysis:*

Since the Activity area to be disturbed is greater than one acre, the Activity will be required to obtain coverage under the State General Construction Permit through the Santa Ana Regional Water Quality Control Board. The State General Construction Permit is a statewide NPDES Permit that regulates stormwater discharge from construction sites. The Construction General Permit requires the development of a SWPPP by a certified preparer such as a licensed professional engineer. Standard permit conditions have been added requiring the Activity to obtain coverage under the General Construction Permit as well as develop and implement a SWPPP and BMPs during construction. The Activity would result in less-than-significant erosion impacts upon compliance with permit conditions and applicable regulations.

For the reasons described above, the project would have less-than-significant impacts due to geology or soil conditions. Therefore, the project is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

**d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts due to expansive soil conditions upon adherence to MM Geology and Soils 3 which requires individual projects to demonstrate avoidance of significant impacts through implementation of Public Safety and Welfare policies, and that no mitigation measures are required.

*Activity-Specific Analysis:*

According to the Preliminary Geotechnical Report, the on-site soils have a very low potential for expansion and that the Activity does not pose a substantial risk to life or property. Furthermore, standard permit conditions have been added requiring the Activity to comply with provisions of the CBC and that compliance will be enforced by the City Building Official through the City building permit review and inspection program.

For the reasons described above, the project would have less-than-significant impacts to life or property due to expansive soil conditions. Therefore, the project is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

**e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts caused by soils incapable of supporting use of septic tanks or alternate wastewater systems upon adherence

to compliance with City Municipal Code Chapters 16.24, 16.34, and 16.56 governing the installation of these facilities, and that no mitigation measures are required.

*Activity-Specific Analysis:*

The proposed development would connect to existing sewer lines maintained by Elsinore Valley Municipal Water District (EVMWD) and would not use septic tanks or alternate water systems. Therefore, the Activity will not result in impacts caused by use of septic tanks or alternative waste water systems.

For the reasons described above, the project would have less-than-significant impacts due to installation of septic tanks or alternative waste water systems. Therefore, the project is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

**f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

*GP EIR Analysis:*

The GP EIR did not specifically identify significant impacts related to paleontological resources resulting from implementation of the General Plan.

*Activity-Specific Analysis:*

According to the Cultural Resource Survey prepared for the Activity, the Activity site is void of any known unique paleontological resource, site or geologic features. MM Cultural/Paleontological Resources 1 through 8 will be added as permit conditions to mitigate potential impacts to unknown significant paleontological resources or geologic features that may be discovered during Activity construction to less-than-significant levels.

For the reasons described above, the project would have less-than-significant impacts due to destruction of unique paleontological resources or geologic features. Therefore, the project is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.



## 4.8 Greenhouse Gas Emissions

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	pp. 3.7-26 to 3.7-32	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	pp. 3.7-32 to 3.7-34	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following review of greenhouse gas impacts is based on the Greenhouse Gas Emissions Assessment prepared for the Activity by Investigative Science and Engineering dated October 12, 2022 (included as Appendix E). The purpose of the Greenhouse Gas Emissions Assessment is to assess the potential of greenhouse gas impacts resulting from Activity construction and operation and to evaluate project emissions against applicable greenhouse gas emission significance thresholds set by the South Coast Air Quality Management District (SCAQMD). A summary of the Air Quality Conformity Assessment is provided below:

- Aggregate emissions generated by the Activity would equate 600.8 metric tons (MT) of CO<sub>2e</sub> (i.e., carbon dioxide equivalent) per year, less than the conservative proposed significance threshold of 3,000 MT/year set by SCAQMD (current threshold is 10,000 MT/year for industrial facilities)
- The Activity conforms to AB 32 and may be presumed to have a less-than-significant greenhouse gas impact

**a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**OR**

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

### *GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant greenhouse gas impacts upon adherence to various City greenhouse gas reduction measures including those set forth in the City's Climate Action Plan (CAP), and that no mitigation measures are required.

### *Activity-Specific Analysis:*

According to the Greenhouse Gas Emissions Assessment, it was found that the Activity would generate a total of 600.8 MT of CO<sub>2e</sub> per year which is less than the proposed significance threshold of 3,000 MT/year pursuant to SCAQMD guidelines. Total calculated emissions include the sum of all individual source contributions including traffic generation, onsite uses, energy consumption, waste generation, water usage, and construction-related emissions. Therefore, it can be determined that the Activity falls within the assumptions of the General Plan and is consistent with the CAP.

For the reasons described above, the Activity would have less-than-significant greenhouse gas impacts. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

## 4.9 Hazards and Hazardous Materials

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	pp. 3.10-20 to 3.10-23	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	pp. 3.10-20 to 3.10-23	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	pp. 3.10-20 to 3.10-23	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	pp. 3.10-23 to 3.10-24	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	pp. 3.10-24 to 3.10-25	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	pp. 3.10-25 to 3.10-26	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	pp. 3.10-26 to 3.10-27	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following assessment of potential hazard and hazardous materials impact is based on the Phase 1

Environmental Site Assessment Report prepared by Partner Engineering and Science dated January 13, 2022 (included as Appendix F) for the Activity. The purpose of the Environmental Site Assessment Report is to assess environmental conditions at the Activity site and to determine whether the site possesses contaminants based on historical data and previous uses of the site. The Environmental Site Assessment Report concludes that there is no evidence suggesting hazardous environmental conditions or issues existing at the Activity site.

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

**OR**

**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?**

**OR**

**c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

*GP EIR Analysis:*

The GP EIR Analysis concludes that implementation of the General Plan would result in less-than-significant impacts caused by hazardous material logistics, accidental spill or release of hazardous materials, or emissions of hazardous materials affecting sensitive receptors upon adherence to MM Hazards 1 and MM Hazards 2, which require individual development projects to demonstrate avoidance of significant impacts associated with the use, storage and disposal of hazardous materials and exposure control of hazardous materials through implementation of General Plan policies concerning public safety and hazards.

*Activity-Specific Analysis:*

The Activity does not involve routine transport, use, or disposal of substantial amounts of hazardous materials and therefore would not create significant hazards to the public. Furthermore, the Activity is not expected to use or store substantial quantities of hazardous materials that would require special review or permitting by the Fire Department or regulatory agencies. Permit conditions have been added requiring the Activity to comply with all Fire Department requirements, including those requiring compliance with storage regulations for hazardous materials if material quantity thresholds will be exceeded. The Activity site is not located within one-quarter mile of an existing or proposed school and thus the Activity would not result in impacts to school receptors resulting from accidental emissions or release of hazardous materials, substances, or waste. Lastly, there are no unique or special operating characteristics (such as ventilation requirements) that would warrant detailed environmental review.

For the reasons described above, the Activity would have no new impacts due to hazardous materials logistics, use or accidental release. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

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

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts

associated with development of a site included on a list compiled pursuant to Government Code § 65962.5 (“Cortese List”) upon adherence to individual environmental review of development projects, and that no mitigation measures are required.

*Activity-Specific Analysis:*

According to Appendix C of the Environmental Site Assessment Report, the Activity site is not located on a site included on the Cortese List or any other regulatory database. Therefore, the Activity would not result in any new impacts due to associations with any site included in a regulatory database.

For the reasons described above, the Activity would have no new impacts due to involving a Cortese List site. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified within the GP EIR.

**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?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts caused by exposing people to excessive noise levels near airports upon adherence to MM Hazards 4 which requires project-specific analysis to be conducted for individual development projects within the Skylark Airport Influence Area as shown on Figure 2.7 of the General Plan.

*Activity-Specific Analysis:*

The Activity is not within the vicinity of any airfield. The nearest airfield is the privately owned and operated Skylark Airport located approximately 3.50 miles to the southeast of the Activity site. Therefore, there is no potential for the Activity to introduce new airport-related hazards exposing people residing or working in the area to excessive noise levels.

For the reasons described above, the Activity would have less-than-significant impacts to receptors due to airport-related safety hazards or excessive noise levels. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

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

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in no impacts caused by impairing implementation or physically interfering with an adopted emergency response or evacuation plan upon adherence to compliance of individual projects with fire code provisions and site-specific review, and that no mitigation is required.

*Activity-Specific Analysis:*

The Activity involves a proposal to rezone and develop an off-road vehicle manufacturing facility on an in-fill site within a developed, urban setting. The Activity does not involve substantial reconfigurations or divisions to parcel boundaries which could potentially affect emergency access. The Activity does not conflict with the

City's Emergency Preparedness Plan or the Riverside County Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan. The Activity will provide and maintain adequate roadway connections and emergency access points for emergency equipment and personnel. The Riverside County Fire Department has reviewed the Activity development plans and did not identify any potential impacts to emergency-related access or response levels of service resulting from the Activity.

For the reasons described above, the Activity would have less-than-significant impacts due to impairing implementation of or physically interfere with adopted emergency response or evacuation plans. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

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

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant wildfire hazard impacts upon adherence to MM Hazards 5 which requires individual projects implemented pursuant to the Land Use Plan in each District to demonstrate avoidance of significant impacts associated with wildfire hazards through implementation of the policies under the Wildfire Hazards section of the Public Safety and Welfare chapter of the General Plan.

*Activity-Specific Analysis:*

The Activity site is located in a Moderate Fire Hazard Severity Zone according to Figure 3.1 of the General Plan. General Plan policies require projects in susceptible fire areas to implement measures including on-going brush clearance and low fuel landscaping practices, the creation of fuel modification zones within high hazard areas, and incorporation of fire-resistant building techniques such as non-combustible wall surfacing materials and fire sprinklers. Standard permit conditions have been added requiring the Activity to comply with the California Fire Code, Riverside County Fire Department, and CalFire requirements in effect at the time of construction.

For the reasons described above, the Activity would have less-than-significant wildfire hazard impacts. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

## 4.10 Hydrology and Water Quality

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	pp. 3.9-18 to 3.9-33	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	pp. 3.9-18 to 3.9-33	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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; or iv) impede or redirect flood flows?	pp. 3.9-33 to 3.9-34	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	pp. 3.9-35 to 3.9-37	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	pp. 3.9-18 to 3.9-33	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following review of potential hydrology and water quality impacts is based on the project-specific Preliminary Water Quality Management Plan (PWQMP) prepared by Ware Malcomb dated September 27, 2021 (included as Appendix G) and the project-specific Hydrology/Hydraulics Study prepared by Ware Malcomb dated September 24, 2021 (included as Appendix H). The purpose of the Hydrology/Hydraulics Study is to determine onsite and offsite peak flow volumes for pre-development and post-development conditions, confirm that post-development peak flows do not exceed pre-development peak flows, appropriately size drainage structures, and ensure that the development does not adversely affect surrounding and downstream properties through runoff flows or flooding. The purpose of the PWQMP is to outline and describe project implementation measures to manage the quality and quantity of runoff that flows from the

Activity site after construction is completed.

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

**OR**

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

**OR**

**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, and cause erosion, increase runoff rates, or overflow drainage systems?**

**OR**

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

**OR**

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

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to water quality or hydrology upon adherence to MM Hydrology 1 which requires individual projects to implement General Plan policies pertaining to flooding and floodplains (Policies 5.1-5.2), water resources (Policies 4.1-4.4), and biological resources (Policies 1.1-1.8 and 2.1-2.2). The GP EIR identifies federal, state and local requirements governing water resources including the Clean Water Act, the Porter-Cologne Water Quality Control Act, and Executive Order 11988 (Floodplain Management) in addition to other applicable state laws and regulations.

*Activity-Specific Analysis:*

According to the Hydrology/Hydraulics Report, the Activity site is currently vacant and undeveloped. The site slopes generally from east to west to an existing drainage swale at about one to ten percent grade. The site currently receives runoff flows from the lot to the north and street runoff from Collier Avenue. The proposed development includes construction of an industrial building, paved parking areas, and pervious landscaping. Runoff will be conveyed through pipe and drain to three drywells and permeable concrete in the onsite parking area. The drywell and permeable concrete will serve as water quality facilities to treat runoff before final conveyance offsite at the western site boundary. The Activity will maintain drainage patterns similar to existing conditions and the post-development peak flows will be less than pre-development peak flows. Furthermore, the Activity site is not located in any flood-prone area, such as a Special Flood Hazard Area designated by the Federal Emergency Management Administration (FEMA), tsunami or seiche zone that would warrant special review and analysis. Therefore, the Activity will not cause significant erosion or flooding effects.

Construction

Activity construction activities would include grading, excavation, installation of subsurface infrastructure, and other earthmoving activities which could potentially cause erosion that could degrade surface or ground water



quality and/or violate water quality standards. Moreover, the use of heavy construction equipment could result in the accidental release of hazardous materials (e.g., oils, fuels, and other water quality pollutants) that could potentially affect surface and/or ground water quality. As required by the Clean Water Act, the Activity must comply with the Santa Ana Municipal Separate Storm Sewer (MS4) NPDES Permit. The NPDES MS4 Permit Program, which is administered in the project area by Riverside County and is issued by the SARWQCB, regulates storm water and urban runoff discharges from developments to natural and constructed storm drain systems in the City. Because the project would disturb one or more acres of soil, construction activities would be subject to the Construction General Permit (NPDES General Permit No. CAS000002, Waste Discharge Requirements, Order No. 2009-0009-DWQ, adopted September 2, 2009 and effective as of July 2, 2010) issued by the State Water Resources Control Board. The Construction General Permit requires implementation of a Storm Water Pollution Prevention Plan (SWPPP) for site clearing, grading, and disturbances such as stockpiling or excavation. The SWPPP would generally contain a site map showing the construction perimeter, proposed buildings, storm water collection and discharge points, general pre- and post-construction topography, drainage patterns across the site, and adjacent roadways. Standard permit conditions have been added requiring the Activity to prepare and implement a SWPPP to minimize construction-related water quality or hydrology impacts.

#### Operation

The Activity site is located within the Lake Elsinore sub-watershed of the Santa Ana Watershed region of Riverside County. The Santa Ana Regional Water Quality Control Board (SARWQCB) sets water quality standards for ground and surface waters within the region. Water quality standards are defined under the Clean Water Act to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those uses (i.e., water quality objectives). The PWQMP identifies appropriate Best Management Practices (BMPs) and site design measures to avoid downstream water quality impacts. Specifically, in its developed condition, site runoff will be conveyed through pipe and drain to three drywells and permeable concrete in the onsite parking area. The drywell and permeable concrete will serve as water quality facilities to treat runoff before final conveyance offsite at the western site boundary. Infiltration BMPs are not necessary because the Activity qualifies for the 'Highest and Best Use' exemption for stormwater runoff since site flows discharge toward Lake Elsinore. Standard permit conditions have been added requiring the Activity to prepare and implement a final project-specific water quality management plan to ensure that water quality impacts are avoided or minimized, and the Activity will meet regulatory thresholds.

For the reasons described above, the Activity would have less-than-significant water quality or hydrological impacts. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

## 4.11 Land Use and Planning

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the project:				
a) Physically divide an established community?	pp. 3.1-14 to 3.1-42	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	pp. 3.1-14 to 3.1-42	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### a) Physically divide an established community?

**OR**

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

#### *GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts based on conflicts with adopted land use plans, policies, or regulations, and that no mitigation measures are required.

#### *Activity-Specific Analysis:*

The Activity involves a rezoning of a vacant in-fill parcel from C-M to M-1 and a proposal to construct and operate an approximately 25,000 square-foot off-road vehicle manufacturing facility. The M-1 zoning designation is compatible with the Activity parcel's current General Plan land use designation of Business Professional. The proposed change in zoning would expand the set of permitted activities allowed on the site to include limited industrial activities including manufacturing, machine shops, storage, and other industrial uses. In the M-1 zone, all uses must be conducted entirely within a completely enclosed building, and maintain an exterior environment free from odor, dust, smoke, gas, noise, vibration, electromagnetic disturbance, and the storage of hazardous waste. Surrounding uses include various kinds of existing commercial and industrial businesses. Therefore, the Activity will comply with the General Plan Land Use Element and applicable development policies and is not expected to cause any significant environmental impacts resulting from land use conflicts.

Furthermore, the proposed development does not involve any changes to right-of-way alignments or reconfiguration of existing lot boundaries. The Activity site is located in a developed, urban area. Therefore, the Activity does not have the potential to physically divide an established community.

For the reasons described above, the Activity would have less-than-significant impacts due to conflicts with adopted land use plans, policies or regulations. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP

EIR.

## 4.12 Mineral Resources

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
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?	pp. 3.12-10 to 3.12-11	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	pp. 3.12-10 to 3.12-11	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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?**

**OR**

**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?**

### *GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to Mineral Resources upon adherence to compliance with the California Surface Mining and Reclamation Act of 1975, and that no mitigation measures are required.

### *Activity-Specific Analysis:*

According to General Plan Figure 3.12-1, most of the City including the Activity site is located in Mineral Resource Zone 3 (MRZ-3) by the State Mining and Geology Board. MRZ-3 represents areas which contain known mineral deposits that may qualify as mineral resources and are considered to have moderate potential for discovery of economic mineral deposits. However, the Activity is an in-fill development which does not involve mining or extraction activities, and the Activity site is not zoned for mining or extraction purposes. Therefore, there is no potential of the Activity resulting in the loss of availability of locally important or economically significant mineral resources.

For the reasons described above, the Activity would have no impacts on mineral resources. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

## 4.13 Noise

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	pp. 3.5-25 to pp. 3.5-51	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	pp. 3.5-25 to pp. 3.5-51	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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, would the project expose people residing or working in the project area to excessive noise levels?	p. 3.5-51	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following review of potential noise impacts is based on the Acoustical Site Assessment prepared by Investigate Science and Engineering, Inc. dated August 24, 2022 (included in Appendix I) for the Activity. The purpose of the Acoustical Site Assessment is to assess the potential noise impacts resulting from both Activity construction and operation, and also to evaluate whether the project would expose people to excessive noise levels by exceeding City noise regulations.

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

**OR**

**b) Generation of excessive groundborne vibration or groundborne noise levels?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would:

- Result in significant and unavoidable noise impacts caused by an increase in the number of vehicles on local street networks and by placing new receptors near roadways. MM Noise 1, which requires future developments to analyze the impacts of new increased traffic volume on noise conditions along affected roadways.
- Result in less-than-significant noise impacts caused by new industrial uses upon adherence to MM Noise 5, which requires future developments to demonstrate compliance with City noise standards.

*Activity-Specific Analysis:*

In satisfaction of MM Noise 1 and MM Noise 5, the Acoustical Site Assessment was prepared to analyze Activity noise impacts and assess compliance of the Activity with City noise standards. Existing ambient noise at the proposed building site was identified and measured, and it was determined that sources of ambient noise are primarily generated by traffic on surrounding roadways and surrounding land uses. No excessive or unusual noise levels were identified. The construction and operation of the Activity is not expected to substantially increase the number of vehicles on local street networks that would substantially increase ambient noise levels to a significant degree (i.e., discernable to human hearing). Therefore, the Activity would not cause significant cumulative noise effects caused by substantially increasing ambient noise levels.

The Activity will create temporary noise impacts during construction primarily due to use of mobile construction sources. City noise standards for construction activities are provided by City Municipal Code Section 17.176.080 which generally limits construction noise between 7:00 am and 7:00 pm Monday through Friday with potential exceptions. According to the Acoustical Site Assessment, the noise generated by Activity construction equipment would not violate the applicable noise ordinance standards. Therefore, noise impacts would be less-than-significant. Although not required to mitigate any significant effect, standard permit conditions requiring equipment to be located the maximum distance feasible from the Activity boundaries will be added to ensure compliance with the noise ordinance and to minimize potential noise impacts. Furthermore, the Activity will not involve equipment that could cause significant vibrations and is expected to use heavy machinery with grousers or rubber tires.

The Activity will create noise impacts during operation due to exterior, roof-mounted air conditioning compressors. However, noise generated from HVAC equipment will not exceed City noise standards. Furthermore, the operation of the facility would not create any noise impacts since activities in the M-1 zoning district must be conducted indoors. Therefore, any potential noise impacts from Activity operation would be less-than-significant.

For the reasons described above, the Activity would have less-than-significant noise impacts due to generation of excessive noise or vibration impacts. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

**c) 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, would the project expose people residing or working in the project area to excessive noise levels?**

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts caused by exposing people to excessive noise levels near airports upon adherence to MM Noise 10 which requires project-specific analysis to be conducted for individual development projects near airfields.

*Activity-Specific Analysis:*

The Activity is not within the vicinity of any airfield. The nearest airfield is Skylark airport which is privately owned and operated and located approximately 3.50 miles to the southeast of the Activity site. Therefore, there is no potential for the Activity to expose people residing or working in the area to excessive noise levels.

For the reasons described above, the Activity would have less-than-significant noise impacts to receptors due

to airport-related noise levels. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

## 4.14 Population and Housing

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	pp. 3.13-20 to 3.13-22	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	pp. 3.13-22 to 3.13-23	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

### *GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than significant impacts to population and housing caused by inducing unplanned population growth, and that no mitigation measures are required. Implementation of the General Plan and build-out of the General Plan area in accordance with the General Plan is assumed to be manageable for the City and would avoid significant physical impacts to the environment.

### *Activity-Specific Analysis:*

The Activity is an in-fill non-residential development proposal which is consistent with the General Plan, and the GP EIR fully accounted for potential environmental impacts resulting from development of the site occurring in accordance with the General Plan. Thus, the Activity does not have the potential to cause significant physical effects to the environment. Furthermore, the Activity does not propose to construct new infrastructure that could induce new physical growth or development. Therefore, the Activity would not induce unplanned population growth.

For the reasons described above, the Activity would have less-than-significant population or housing impacts due to inducing substantial unplanned population growth. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

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

### *GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to



population and housing due to displacing substantial numbers of existing people or housing, and that no mitigation measures are required.

*Activity-Specific Analysis:*

The Activity does not involve the displacement of existing people or housing. The Activity is a proposal to rezone and develop a vacant parcel that is not currently planned for residential uses. Therefore, the Activity would not result in any new population or housing impacts.

For the reasons described above, the Activity would have less-than-significant population or housing impacts due to housing or resident displacement. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

## 4.15 Public Services

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision 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 any public services?	pp. 3.14-15 to 3.14-22	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) Result in substantial adverse physical impacts associated with the provision 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 any public services?**

### *GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to public services upon adherence to MM Public Service 1, which requires individual projects to demonstrate avoidance of significant impacts to public services relating police services, fire protection, schools, libraries and animal control.

### *Activity-Specific Analysis:*

A discussion of impacts to public services organized by service type is provided below.

**Police Protection:** Chapter 16.74 of the LEMC establishes a program for the adoption and administration of development impact fees by the City for the purpose of defraying the costs of public expenditures for capital improvements (and operational services to the extent allowed by law) which would benefit such new development. The project would participate in this development impact fee program to mitigate potential impacts to police protection resources. Additionally, the project would be required to comply with applicable law enforcement requirements and standards to ensure adequate law enforcement protection is available to serve the proposed development. Potential impacts would be considered incremental and can be offset through the payment of the development impact fee and compliance with regulatory requirements. The project would not result in substantial adverse physical impacts related to police protection. Therefore, the project would not significantly impact police protection resources or services.

**Fire Protection:** The project would be subject to City policies and ordinances relating to hazard mitigation and fire prevention. The project would be required to comply with applicable fire code requirements for construction and access to the site and as such, will be reviewed by the City Fire Department to determine the specific fire requirements applicable to ensure compliance with these requirements. Chapter 16.74 of the LEMC

establishes a program for the adoption and administration of development impact fees by the City whereby as a condition to the issuance of a building permit or certificate of occupancy by the City, the property owner or land developer is required to pay development impact fees or provide other consideration to the City for the purpose of defraying the costs of public expenditures for capital improvements (and operational services to the extent allowed by law) which will benefit such new development. Section 16.74.049 includes a “fire facilities fee” to mitigate the additional burdens created by new development for City fire facilities. The project would incrementally increase demands for fire protection services associated with service calls, inspections, etc. The increase in demand for fire protection services is not anticipated to require the construction of new facilities or infrastructure. Therefore, any impacts related to fire protection resulting from the project would be less-than-significant.

**Schools:** The proposed development is located within the Lake Elsinore Unified School District (LEUSD). The project would be required to pay school impact fees as levied by the LEUSD, which would provide funding for school facilities. The project does not propose new housing and therefore no increase in demand for LEUSD facilities and services would be created. Therefore, any potential impacts would be considered incremental and would be offset through the payment of the appropriate development impact fees for schools. Based on the above, the proposed project will not result in substantial adverse physical impacts related to schools. Any impacts would be less-than-significant.

**Other Public Facilities:** The City is a part of the Riverside County Library System. Section 16.34.060 of the LEMC requires that prior to the issuance of a building permit, the property owner or developer must pay fees for the purposes set forth in that section. Section 16.34.060.B establishes the City’s Library Mitigation Fee program and provides that an in-lieu fee for future construction of library improvements shall be paid to the City to ensure that the necessary library facilities are provided to the community. Since the project would not include new housing, potential impacts to library services would be less-than-significant.

Chapter 16.74 of the LEMC establishes a program for the adoption and administration of development impact fees by the City for the purpose of defraying the costs of public expenditures for capital improvements (and operational services to the extent allowed by law) which would benefit such new development. Section 16.74.048 includes an “Animal shelter facilities fee” to mitigate the additional burdens created by new development for animal facilities. In addition, the property owner would be required to pay City Hall & Public Works fees, Community Center Fees, and Marina Facilities Fees prior to the issuance of building permits. Therefore, potential impacts associated with other public services and facilities would be less-than-significant.

For the reasons described above, the Activity would have less-than-significant impacts to public services. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

## 4.16 Recreation

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the project:				
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?	pp. 3.15-18 to 3.15-23	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	pp. 3.15-18 to 3.15-23	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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?**

**OR**

**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?**

### *GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts upon adherence to General Plan Parks and Recreation Goals 8 and 9, which establish parkland and trail system targets, and General Plan Land Use Policies 1.1 and 2.1, which promote and encourage the preservation of open space with recreational opportunities as well as the establishment of both passive and active recreational uses.

### *Activity-Specific Analysis:*

The Activity involves a development proposal to construct an industrial facility and therefore would not induce population growth that would require provision of additional recreation facilities or parklands. The project does not propose residential uses so it would not introduce additional residents who would need park facilities or services. Therefore, a direct increase in park usage is not expected because of the project. New commercial development may cause incremental indirect impacts to park facilities from the occasional use of a park by employees. Section 16.34.060 of the LEMC requires that prior to the issuance of a building permit, the property owner or developer must pay fees for the purposes set forth in that section. Section 16.34.060.D describes the City's Park Capital Improvement Fund and describes that the City Council has the option to request dedication for park purposes or in lieu thereof, request that the property owner or developer pay a fee for the purpose of purchasing the land and developing and maintaining the City park system. The Activity would be required to pay park fees to the City for the purpose of establishing, improving, and maintaining park land within the City. Because the Activity does not propose new housing, any potential impacts would be considered incremental

and would be offset through the payment of the appropriate park fees. Based on the above, the project would not result in substantial adverse physical impacts related to parks. Any impacts would be less-than-significant.

Standard permit conditions have been added requiring payment of development fees to off set any financial or environmental impacts resulting from the Activity.

For the reasons described above, the Activity would have no new impacts to recreation. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

## 4.17 Transportation

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	pp. 3.4-64 to 3.4-109 pp 3.4-111 to 3.4-121	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	pp. 3.4-109 to 3.4-110	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	p. 3.4-110	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following review of potential traffic impacts is based on the Vehicle Miles Traveled (VMT) Assessment prepared by Linscott, Law and Greenspan, Engineers dated July 27, 2022 (included as Appendix J) for the Activity. The purpose of the VMT Assessment is to assess the potential effects of the project on the transportation system by estimating changes to VMT per capita. The VMT Assessment found that the incremental change to VMT per capita caused by the project is presumed to be less-than-significant because the project meets the City-adopted impact screening criteria. The City's Traffic Impact Analysis guidelines provides that local serving uses with a floor area less than 50,000 square feet can be presumed to have a less-than-significant. Therefore, the VMT Assessment concludes that the Activity would not cause a significant impact to VMT per capita.

### **a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

#### *GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan could result in significant and unavoidable impacts, and the GP EIR identified, among other measures, MM Transportation 2 which requires individual projects implemented pursuant to the GP Land Use Plan to demonstrate avoidance of significant impacts through implementation of the ultimate roadway and intersection classifications and improvements shown on the Capital Improvement Program as well as the goals and policies set forth by the policies to minimize the significance of transportation impacts.

#### *Activity-Specific Analysis:*

The City of Lake Elsinore has concluded that the Activity is exempt from the requirement to prepare a traffic impact analysis due to low potential of the Activity generating substantial traffic volumes. Therefore, the Activity may be presumed to have a less-than-significant impact on the capacity for the Activity to adversely impact the surrounding road network in conflict with existing circulation policies and plans of the General Plan. Standard permit conditions have been added requiring the Activity to dedicate portions of the Activity site to the public

right-of-way along Collier Avenue to meet its ultimate width as shown on the General Plan. Moreover, the Activity is required to construct half-width improvements in the public right-of-way abutting the Activity site along both site frontages on Chaney Street and Collier Avenue in conformance with City standards. Therefore, there is no potential for the Activity to conflict with circulation programs, plans, ordinances, or policies.

For the reasons described above, the Activity would have no impacts on the circulation system. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

**b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) and cause vehicle miles impacts?**

*GP EIR Analysis:*

The GP EIR did not identify significant impacts specifically related to vehicle miles traveled resulting from implementation of the General Plan.

*Activity-Specific Analysis:*

According to the VMT Assessment which was reviewed and accepted by the City's Engineering Division, it was found that the incremental change to VMT per capita caused by the project may be presumed to be less-than-significant because the project meets the City-adopted impact screening criteria. The City's Traffic Impact Analysis guidelines provide that local serving uses with a floor area less than 50,000 square feet can be presumed to have a less-than-significant. Therefore, the VMT Assessment concludes that the Activity would not cause a significant impact to VMT per capita.

For the reasons described above, the Activity would have less-than-significant to VMT per capita. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

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

*GP EIR Analysis:*

The GP EIR concludes that the Activity would result in less-than-significant transportation impacts caused by a substantial increase in hazards due to proposed design features or incompatible uses, and that no mitigation measures are required.

*Activity-Specific Analysis:*

Standard permit conditions have been added requiring the Activity to dedicate property along Collier Avenue and construct half-width improvements to Collier Avenue and Chaney Street in accordance with City standards and the General Plan Circulation Element. The Activity does not propose any geometric design features or incompatible uses that would cause hazards to vehicles, pedestrians, or other users of the surrounding network.

For the reasons described above, the Activity would have no transportation impacts caused by an increase in hazards due to design features or land use conflicts. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified

significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

**d) Result in inadequate emergency access?**

*GP EIR Analysis:*

The GP EIR concludes that the Activity would result in less-than-significant transportation impacts caused by inadequate emergency access and that no mitigation measures are required. The GP EIR also states that individual projects would require review by the City Fire Department to determine applicable requirements and ensure that adequate emergency access would be provided.

*Activity-Specific Analysis:*

The proposed development has been reviewed by the City's Fire Department and it was determined that the Activity would provide adequate emergency access. The Activity site would be accessible via two full-width driveways on each frontage. The driveway on Collier Avenue would be non-restricted to vehicle traffic whereas the driveway on Chaney Street would be restricted to access by emergency equipment and personnel. Standard permit conditions have been added requiring the Activity to comply with any applicable Fire Department requirements concerning access such as the provision of Knox box facilities and visible building address signage.

For the reasons described above, the Activity would have no impacts on mineral resources. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.



## 4.18 Utilities and Service Systems

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
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?	pp. 3.16-18 to 3.16-28 pp. 3.16-33 to 3.16-34	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	pp. 3.16-18 to 3.16-28	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	pp. 3.16-18 to 3.16-28	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	pp. 3.16-29 to 3.16-33	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	pp. 3.16-29 to 3.16-33	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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?**

**OR**

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

**OR**

**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?**

Water Supplies and Wastewater Systems

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to water and wastewater services upon adherence Elsinore Valley Municipal Water District (EVMWD) requirements including compliance with the EVMWD Wastewater Master Plan, Urban Water Management Plan, payment of established EVMWD utility rates and connection fees, water-efficient landscaping ordinance requirements of City Municipal Code Chapter 19.08, and construction of water supply and wastewater infrastructure in accordance with the requirements of City Municipal Code Chapter 16.

*Activity-Specific Analysis:*

The proposed development site is located within the sewer service boundary of EVMWD. The proposed development would connect with the EVMWD wastewater system. Connections to local sewer mains will involve temporary and less-than-significant construction impacts that will occur in conjunction with other on-site improvements. In addition, the Activity will be required to pay sewer connection fees. Implementation of the Activity will not require, or result in, the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Any impacts would be less-than-significant.

The proposed development site is located within the water service boundary of the Elsinore Valley Municipal Water District (EVMWD). The proposed development would connect to the EVMWD water supply system. Connections to local water mains will involve temporary and less-than-significant construction impacts that will occur in conjunction with other on-site improvements. In addition, the Activity will be required to pay water connection fees and comply with City water-efficient landscaping requirements. Activity implementation will not require, or result in, the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Given the minor scale of the proposed in-fill development, potential impacts are considered nominally incremental and would be less-than-significant.

Standard permit conditions have been added requiring the Activity to comply with EVMWD requirements, standards, and procedures concerning the provision and connection to water supply and wastewater systems.

For the reasons described above, the Activity would have less-than-significant impacts on water supply resources or wastewater system capacity. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

Electricity, Natural Gas and Telecommunications

*GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to utilities and service systems due to servicing the development with electrical, natural gas, and telecommunication services, and that no mitigation measures are required.

*Activity-Specific Analysis*

The proposed development is in a developed, urban setting within the service areas of Southern California

Edison and the Southern California Gas Company. There are no anticipated significant service or system upgrades required to serve the proposed development. Furthermore, the Activity does not involve unique design features or operational characteristics that would require special analysis or load forecasting. Any increase in the demand for public utilities by the project would be less-than-significant. Standard permit conditions have been added requiring the Activity to coordinate and comply with utility requirements and standards concerning the provision and connection to electricity, natural gas, and telecommunication connections.

For the reasons described above, the Activity would have less-than-significant impacts on electricity, natural gas, and telecommunication systems. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

### Stormwater Facilities

#### *GP EIR Analysis:*

The GP EIR did not specifically analyze potential impacts resulting from relocation of local or regional stormwater facilities.

#### *Activity-Specific Analysis:*

On-site grading and drainage improvements proposed in conjunction with the proposed site work would be required to comply with provisions of the National Pollutant Discharge Elimination System (NPDES) program, including Waste Discharge Requirements (WDR), and the 2010 Santa Ana Municipal Separate Sewer Permit (MS4) Permit, as enforced by the Santa Ana Regional Water Quality Board (SARWQCB). Pursuant to the City's Municipal Code, all construction projects shall implement Best Management Practices (BMPs) to be specified in a submitted Stormwater Pollution Prevention Plan (SWPPP). The project was required to submit a project-specific preliminary Water Quality Management Plan (PWQMP) in identifying post-construction BMPs that include drainage controls such as infiltration pits, detention ponds, bioswales, berms, rain gardens, and pervious pavement. Upon adherence to the PWQMP, the Activity will not substantially alter the existing drainage pattern of the site or area, nor will it require new or expanded off-site storm drain facilities the construction or relocation of which could cause significant environmental effects. Any impacts would be less-than-significant.

For the reasons described above, the Activity would have less-than-significant impacts on stormwater facilities. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

### **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?**

#### **OR**

### **e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

#### *GP EIR Analysis:*

The GP EIR concludes that implementation of the General Plan would result in less-than-significant impacts to solid waste generation or statutory and regulatory compliance issues upon adherence to individual project

review and implementation of general recycling and source reduction programs in addition to conformance with long-term solid waste management plans.

*Activity-Specific Analysis:*

All development within the City of Lake Elsinore is required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), AB 939 (CalRecycle), and other local, state, and federal solid waste disposal standards including City Municipal Code Chapter 14.12. The California Integrated Waste Management Act of 1989 (AB 939) requires every city and county in the state to prepare a Source Reduction and Recycling Element (SRRE) to its Solid Waste Management Plan, that identifies how each jurisdiction will meet the mandatory state diversion goal of 50% by and after the year 2000. The purpose of AB 939 is to “reduce, recycle, and re-use solid waste generated in the state to the maximum extent feasible.” The Activity is required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), AB 939, and other applicable local, state, and federal solid waste disposal standards as a matter of regulatory policy as standard condition of approval, thereby ensuring that the solid waste stream to the waste disposal facilities is reduced in accordance with existing regulations. The Activity is served by regional landfills with sufficient remaining combined capacity to accommodate buildout of the City in accordance with the General Plan. Any impacts would be less-than-significant.

For the reasons described above, the Activity would have less-than-significant impacts on solid waste generation and management. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

## 4.19 Wildfire

Issues	Where impact was analyzed in GP EIR	New Significant Impact	Increase in Severity of Previously Identified Significant Impact	New Information of Substantial Importance
Would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	pp. 3.10-26 to 3.10-27	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**OR**

**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?**

**OR**

**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?**

**OR**

**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?**

#### *GP EIR Analysis:*

The GP EIR did not identify significant impacts specifically related to wildfire resulting from implementation of the General Plan. However, wildfire effects were analyzed as part of the GP EIR assessment in the hazard impact analysis section under Section 3.10. The GP EIR concludes that implementation of the General Plan would result in less-than-significant wildfire hazard impacts upon adherence to MM Hazards 5 which requires individual projects implemented pursuant to the Land Use Plan in each District to demonstrate avoidance of significant impacts associated with wildfire hazards through implementation of the policies under the Wildfire Hazards section of the Public Safety and Welfare chapter of the General Plan.

#### *Activity-Specific Analysis:*

The Activity site is located in a Moderate Fire Hazard Severity Zone according to Figure 3.1 of the General Plan. General Plan policies require projects in susceptible fire areas to implement measures including on-going brush clearance and low fuel landscaping practices, the creation of fuel modification zones within high hazard areas, and incorporation of fire-resistant building techniques such as non-combustible wall surfacing materials and fire sprinklers. Standard permit conditions have been added requiring the Activity to comply with the requirements of the California Fire Code, Riverside County Fire Department, and CalFire in effect at the time of construction. Furthermore, the Activity site is located in a relatively flat area within a developed, urban setting and does not interface with steep topography or prevailing wind patterns that could cause or exacerbate unmanageable wildfire behavior. Furthermore, the Activity will not require the installation of any facilities that would result in significant wildfire impacts; all on-site utilities are required to be installed underground as required by Chapter 16 of the Lake Elsinore Municipal Code.

For the reasons described above, the Activity would have less-than-significant wildfire hazard impacts. Therefore, the Activity is consistent with the analysis of the GP EIR because it would not create new significant impacts, increase the severity of previously identified significant impacts, and there is no new information of substantial importance than that identified in the GP EIR.

## **5.0 References**

The following documents were used as information sources during preparation of this document. They are available for public review at the City of Lake Elsinore, Community Development Department, 130 South Main Street, Lake Elsinore, CA 92530, ph. (951) 674-3124.

- A. Interactive Science and Engineering. (2022). *Air Quality Assessment Mason Motorsports Development Project*.
- B. RECON. (2022). *Biological Resources Letter Report for the Mason Motorsports Project and Burrowing Owl Focused Survey Results for the Mason Motorsports Project*.
- C. RECON. (2022). *Phase 1 Cultural Resources Survey Report for the Mason Motorsports Project*
- D. Construction Testing & Engineering, Inc. (2021). *Preliminary Geotechnical Investigation Proposed Commercial Development NWC Collier Avenue & Chaney Street*.
- E. Interactive Science and Engineering. (2022). *Greenhouse Gas Emissions Assessment Mason Motorsports Development Project*.
- F. Partner Engineering and Science, Inc. (2022). *Phase I Environmental Site Assessment Report*.
- G. Ware Malcomb. (2022). *Project Specific Preliminary Water Quality Management Plan*.
- H. Ware Malcomb. (2022). *Hydrology/Hydraulics Study*.
- I. Interactive Science and Engineering. (2022). *Acoustical Site Assessment Mason Motorsports Development Project*.
- J. Linscott, Law and Greenspan, Engineers. (2022). *Vehicles Miles Traveled (VMT) Assessment for the Proposed Mason Motorsports Project, Lake Elsinore*.