



EXEMPTION JUSTIFICATION

Vantage Auctions Project

Lead Agency:

City of Lake Elsinore
Planning Division
130 South Main Street
Lake Elsinore, CA 92530

Project Applicant:

Vantage Auctions, Inc.
521 Silver Street
Lake Elsinore, CA 92530

CEQA Consultant:

ENVIRONMENT | PLANNING | DEVELOPMENT SOLUTIONS, INC.

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February 2022

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1 INTRODUCTION

Vantage Auctions, Inc. (Applicant) is seeking approval from the City of Lake Elsinore to continue operation of the existing heavy equipment auction facility located at 521 Silver Street, Lake Elsinore, CA 92530. The Project proposes to add additional office space, infrastructure and street improvements, paving, and landscaping to the existing facility. The City of Lake Elsinore is the Lead Agency for the proposed Project. The Lead Agency will utilize this document as evidence that the proposed Project qualifies for two Exemptions pursuant to the California Environmental Quality Act (CEQA) Class 1 Existing Facility Exemption (CEQA Guidelines Sections 15301 and 15300.2) and Common Sense Exemption (CEQA Guidelines Section 15061(b)(3)), which is further described below.

1.1 PURPOSE

Article 19 of the CEQA Guidelines includes, as required by Public Resources Code Section 21084, a list of classes of projects which have been determined not to have a significant effect on the environment. This document demonstrates that the proposed Project qualifies for a CEQA Exemption as an Existing Facility (Class 1 Exemption), consistent with the provisions of CEQA Guidelines Sections 15301 and 15300.2 and provides information for City decisionmakers to find that the proposed Project is exempt under CEQA.

Pursuant to CEQA Guidelines Section 15301, a Class 1 Existing Facilities Exemption consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of "existing facilities" itemized in the CEQA Guidelines are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use.

Furthermore, pursuant to CEQA Guidelines Section 15061(b)(3), a project is exempt from CEQA if the activity is covered by the Common Sense Exemption where there is no possibility that the project "may have a significant effect on the environment".

1.2 CEQA FINDINGS RELATED TO CLASS 1 EXEMPTION

The City of Lake Elsinore determined, following a preliminary evaluation of the proposed Project, that the proposed Project would not result in any significant effects on the environment. This finding is supported by the analysis provided in the remainder of this document and in the appendices. The City of Lake Elsinore makes the following findings in support of the Existing Facilities Exemption (refer to CEQA Guidelines §15301):

Pursuant to CEQA Guidelines Section 15301, the Project qualifies for a Class 1 Exemption as it consists of minor alteration to an existing facility and does not constitute an expansion of use. The Project site is partially graded with temporary trailers, serving as office space, and a parking area serving the auction site. The existing office trailers are currently served by all needed public services.

The Project proposes the addition of an office trailer and various onsite and offsite infrastructure improvements to improve the functionality of the existing site. The Project would continue the existing use of the site which is utilized for heavy construction equipment auctions held six times per year. Modifications to the site would include street improvements, landscaping, the addition of water and sewer lines, and the repair of existing infiltration basins.

The sale of heavy equipment is a conditionally allowed use within the existing Limited Manufacturing (M1) zoning classification for the site.

The Project proposes the addition of one office trailer, which would be used by existing auction staff. As demonstrated by this document, the addition of one trailer and other improvements to the site would not increase traffic, air quality emissions, or greenhouse gas emissions over existing conditions, as discussed in Section 4.1. As such, although the addition of an office trailer increases the building square footage, the modifications would be considered negligible and not an expansion of existing uses because the proposed Project results in the same overall impacts compared to the existing use.

Based on the information above and analysis that follows, the Project qualifies for the Class 1 Exemption.

1.3 CEQA FINDINGS RELATED TO COMMON SENSE EXEMPTION

Based on the analysis that follows within this document, it is evident that the Project does not result in any significant environmental impacts. The proposed Project would not result in an expansion of uses onsite and would continue to operate auctions six times per year, in line with current site conditions and uses, thereby, not contributing to significant construction impacts and resulting in negligible environmental effects from operation of the proposed Project. Based on the information presented in this document, the Project qualifies for the Common Sense Exemption.

1.4 DOCUMENT ORGANIZATION

This Exemption Checklist includes the following sections:

Section 1. Introduction

Provides information about CEQA, its requirements for environmental review, and explains the Categorical Exemption that evaluates the potential impacts of the proposed Project to the physical environment.

Section 2. Environmental Setting

Provides information about the proposed Project's location, the Project site, and background.

Section 3. Project Description

Includes a description of the proposed Project's physical features and construction and operational characteristics.

Section 4. Environmental Analysis

Includes the environmental analysis which evaluates the proposed Project's potential to result in significant adverse effects related to air quality, greenhouse gas emissions, or transportation.

Section 5. Exceptions to Exemptions

Section 6. Document Preparers and Contributors

Section 7. References

2 ENVIRONMENTAL SETTING

2.1 PROJECT LOCATION

The proposed Project is located at 251 Silver Street, Lake Elsinore, CA 92530 and is in the central portion of the City of Lake Elsinore within the County of Riverside. The site is located roughly 0.25 miles southwest of Interstate Route 15 (I-15) and 0.6 miles northeast of Lake Elsinore. Regional access to the Project site is provided by I-15, located northeast of the Project site, and State Route 74 (SR-74) to the northwest. Local Access to the site is from Silver Street and Flint Street. The site is identified by Assessor's Parcel Number 377-160-018, -023, -026, 377-180-030, -054, -057, and 374-033-029, -031. The Project site and surrounding area is shown in Figure 2-1, *Regional Location*, and Figure 2-2, *Local Vicinity*.

2.2 EXISTING PROJECT SITE

The Project site consists of eight parcels encompassing approximately 25.84 acres. Three parcels are situated west of Silver Street and five parcels are situated to the east. The site is partially graded and has upward sloping on the east and south sides of the site. While the majority of the site is disturbed and developed with no natural vegetation, other portions of the site that are not used for auctions contain coastal sage scrub habitat and ornamental trees.

The Project site is currently used for a heavy construction equipment auction six times each year. Approximately 17 acres of the Project site is developed and utilized for heavy construction equipment auctioning and includes a parking area, auction area, auction tent, two trailers serving as offices, five shipping containers serving as storage areas, fencing, two infiltration basins, and other related onsite improvements. There are no permanent structures located on the site. The Project site's existing conditions are shown in Figure 2-3, *Aerial*, and Figure 2-4, *Site Photos*.

2.3 EXISTING LAND USES AND ZONING DESIGNATION OF THE PROJECT SITE

The Project site has a Lake Elsinore General Plan land use designation of Limited Industrial, as shown on Figure 2-5, *General Plan Designation*, and a zoning designation of Limited Manufacturing (M1), as shown on Figure 2-6, *Existing Zoning*. The zoning designation allows for the development of light industrial uses that are relatively free of nuisance or hazardous characteristics and is intended to play a major role in establishing the perceived identity of the City's industrial districts. The sale of heavy equipment is a conditionally permitted use in the M1 zone.

2.4 SURROUNDING GENERAL PLAN AND ZONING DESIGNATIONS

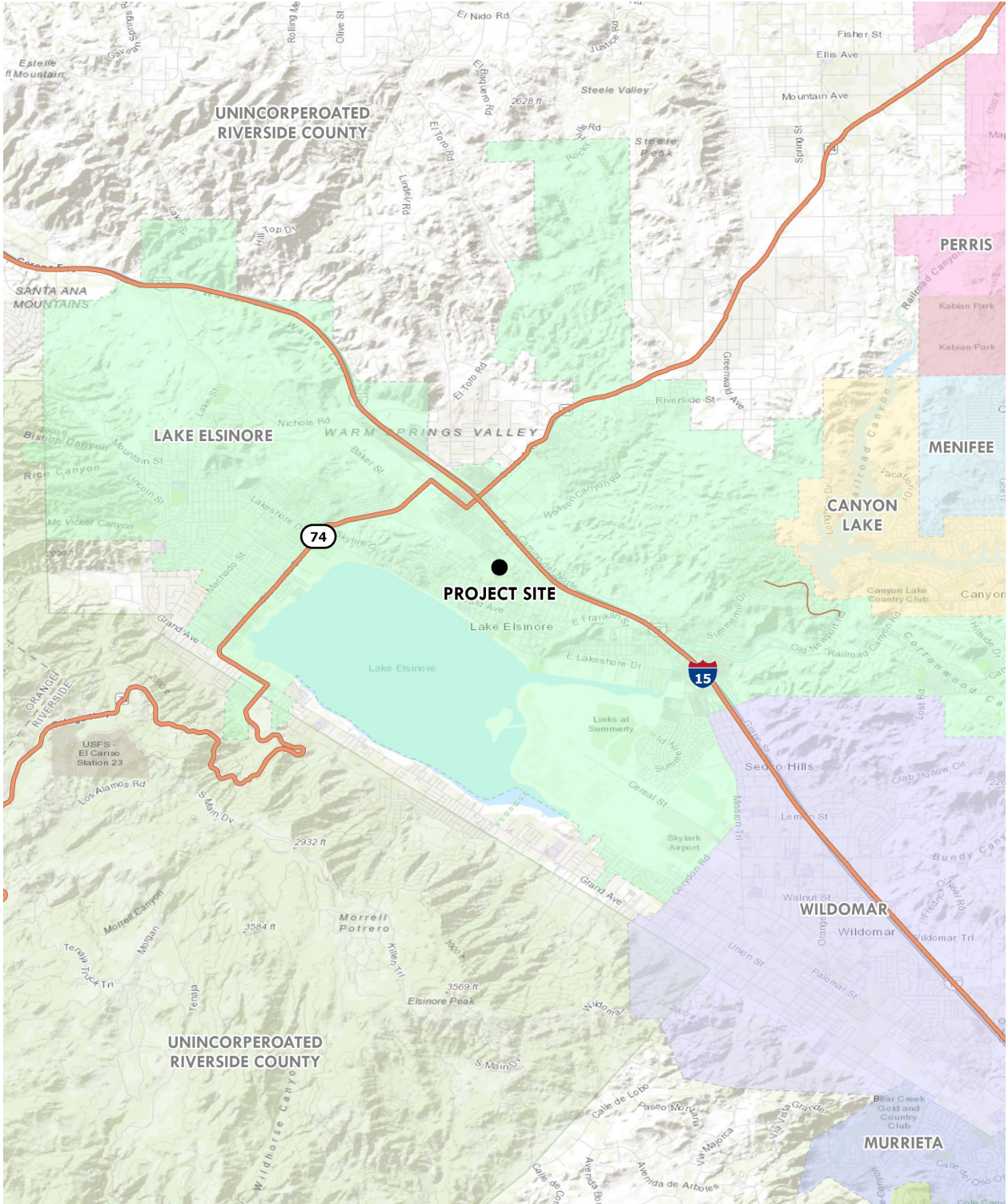
The Project site is located within a developed area of the city. The surrounding land uses are described in Table 1.

Table 1: Surrounding Existing Land Use and Zoning Designations

	Existing Land Use	General Plan Designation	Zoning Designation
North	A Temescal Water Co. ditch borders the Project along the north followed by Valley Adult School directly north of the site and light industrial uses border the site to the northeast.	Public Institutional and Limited Industrial	Public/Institutional (PI) and Limited Manufacturing (MI)

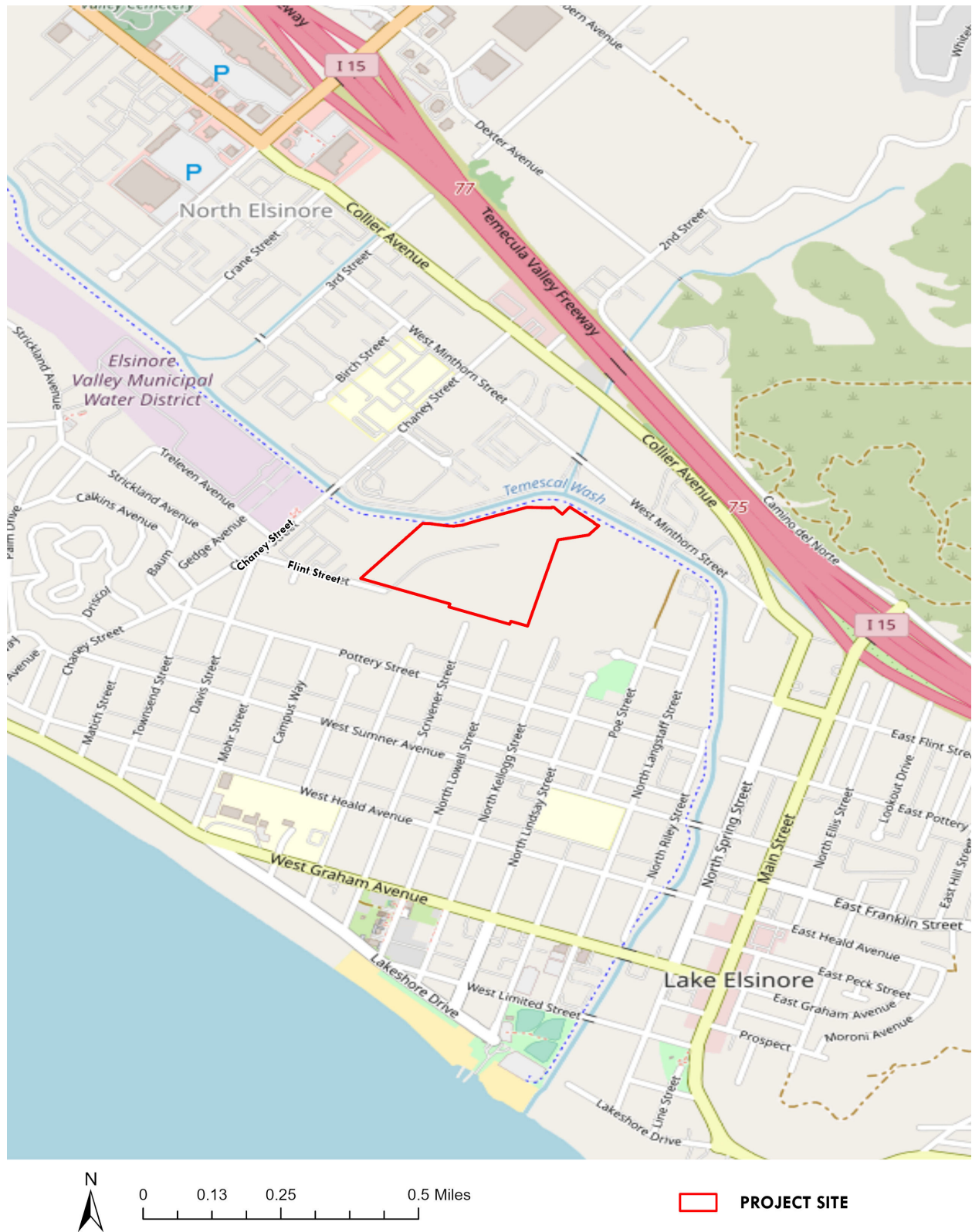
	Existing Land Use	General Plan Designation	Zoning Designation
West	Industrial buildings border the site to the west.	Limited Industrial	Limited Manufacturing (M1)
South	Flint Street followed by light industrial uses and single-family homes.	High Density Residential	High Density Residential (R3)
East	Vacant and undeveloped.	Public Institutional	Public Institutional (PI)

Regional Location



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Local Vicinity



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Site Photos



Eastern views of the southern edge of the Project Site from N Flint Street.



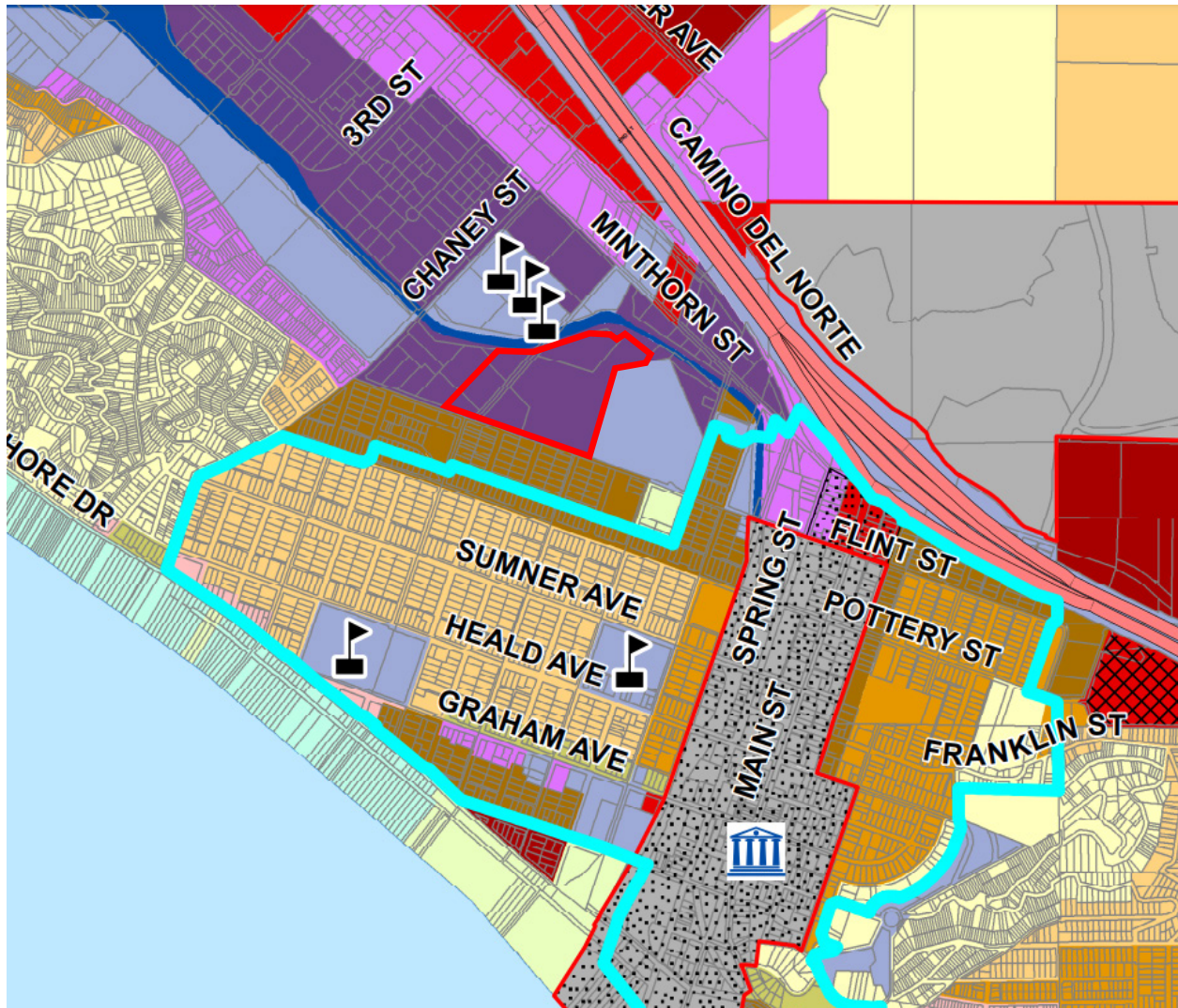
Northern views of the southern edge of the Project Site from N Flint Street.



Northeastern views of the southern edge of the Project Site from N Flint Street.

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Existing General Plan Land Use Designation

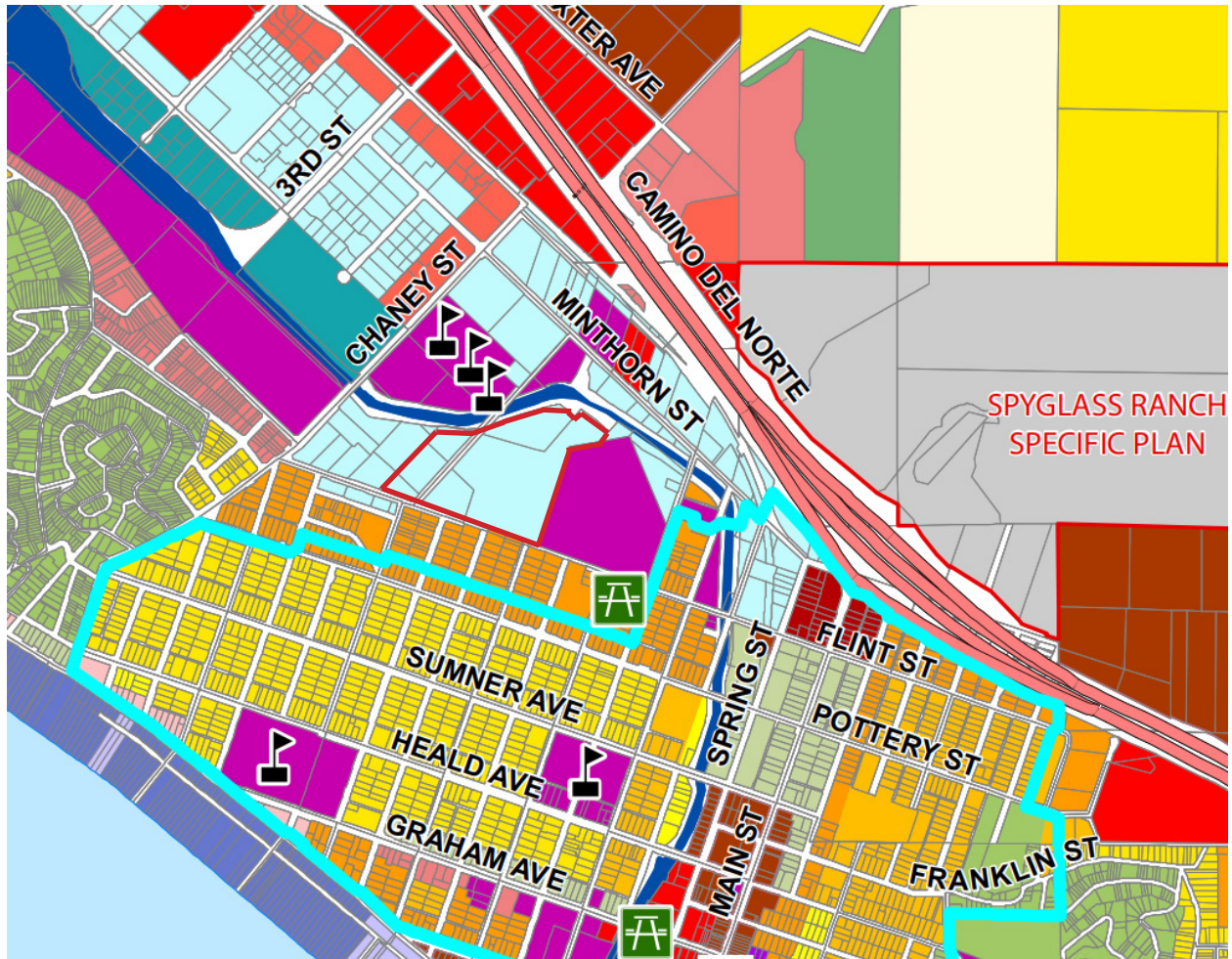


Legend

City Boundary	Hillside Residential	Gateway Commercial
Sphere of Influence	Low Density Residential	Business Professional
Historic Downtown District Boundary	Low-Medium Residential	Recreational
Interstate 15	Medium Density Residential	Downtown Recreational
Highway 74	High Density Residential	Limited Industrial
Schools	Residential Mixed Use	Open Space
City Hall	Commercial Mixed Use	Public Institutional
Extractive Overlay	General Commercial	Floodway
Auto Mall Overlay	Neighborhood Commercial	Specific Plan
Lakeside Residential	Tourist Commercial	

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Existing Zoning Designations



Legend

CITY LAYERS		CITY ZONING	
	City Boundary		RMR - Rural Mountainous Residential
	Specific Plan Boundaries		RH - Hillside Single Family Residential
	Historic Downtown District Boundary		RR - Rural Residential
	Interstate 15		RE - Residential Estate
	Highway 74		R1 - Single Family Residential
	City Hall		R2 - Medium Density Residential
	Schools		R3 - High Density Residential
	Parks		MC - Mobile Home Community
			RMU - Residential Mixed Use
			CMU - Commercial Mixed Use
			C1 - Neighborhood Commercial
			C2 - General Commercial
			CM - Commercial Manufacturing
			CO - Commercial Office
			CP - Commercial Park
			BP - Business Professional
			M1 - Limited Manufacturing
			M2 - General Manufacturing
			M3 - Mineral Resources/Related Manufacturing
			L - Lakeshore
			PI - Public/Institutional
			F - Floodway
			OS - Open Space
			R - Recreation
			SP - Specific Plan
			SPA - Specific Plan Area

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3 PROJECT DESCRIPTION

3.1 PROJECT SITE PLANNING BACKGROUND

As described in Section 2, approximately 17 acres of the Project site functions as the auction yard and contains two office trailers and five shipping containers functioning as a shop and storage area. The auction yard area also includes parking areas and an auction tent. The Project site is vacant and undeveloped along the eastern and southern boundary slopes. The Project site encompasses approximately 25.84 acres and functions as a space for heavy machine equipment auctions six times per year.

3.2 PROPOSED PROJECT

3.2.1 Development Summary

The proposed Project would include modifications to the 17-acre portion of the existing site that functions as the auction yard such as the addition of an office trailer, the repair of the two infiltration basins, and other onsite and infrastructure improvements.

Building Summary

The Project would add one additional office trailer to the Project site as well as street improvements, utilities, and landscaping. The Project would also repair the two existing infiltration basins and create a new 35-foot driveway leading into the parking lot. Additionally, the handicapped parking spaces near the office trailers would be paved and a ramp would be added leading from the viewing tent up to the offices. The Project would continue to operate the auction yard in an open layout with storage areas in the northern portion of the site, auction areas located in the central and western portions of the site, and parking located at the southwest corner of the site. The main viewing tent measuring 40'X60' would remain in the southernmost portion of the main auction yard.

Trailers

Rather than constructing permanent structures, the proposed Project would keep the existing trailers and add an additional Executive office trailer to the site. The new trailer would be placed near the existing trailers, just northeast of the entrance to the site. Three types of trailers would be present on the site and are as follows:

Executive Trailer

The Executive Trailer measures 12'X40' and contain three offices each. The offices on the end measure 12'X12' and the office in the center measures 12'X16'. The Executive Trailer includes a conference room. The Project would include the addition of one executive trailer.

Sales Trailer

The Sales Trailer measures 12'X48' and contains two 12'X12' sales offices as well as an office and breakroom in the center of the trailer. The Project would include the continued use of one Sales Trailer.

Operations Trailer

The Operations Trailer measures 12'X60' and contains two offices and a lobby. The manager's office measures 12'X12', the management office measures 12'X14', and the lobby, which includes three workstations, measures 12'X24'. The Project would include the continued use of one Operations Trailers.

Parking and Loading Summary

The proposed Project includes an existing parking area at the southwest corner of the site which parks 121 vehicles. Additionally, the 15 employee parking spaces near the office trailers would remain. The Project would pave a total of 5 handicapped parking spaces, 2 of which would be located near the office trailers and 3 of which would be located by the auction viewing tent.

Fencing

The proposed Project would leave the existing chain link fence that surrounds the Project site. The fence crosses through the entrance of the site as well as across Flint Street. There are existing gates at these points along Flint Street which allow for access.

Stormwater Drainage

The Project would include maintenance repairs to the two existing infiltration basins. One is located on the western side of the Project site, west of Silver Street and just above the parking area. The second infiltration basin is located on the eastern side of the Project site, just past the auction yard and at the bottom of the western facing slope. The Project would continue to maintain the drainage outlets on the north side of the Project site that drain into the existing Temescal Water Company channel to the north of the site.

Access and Circulation

As shown in Figure 3-1, *Conceptual Site Plan*, access to the Project site is currently available via Silver Street and a driveway which runs perpendicular to Flint Street. The Project proposes constructing an additional 35-foot driveway located west of Silver Street which would lead directly into the parking lot at the southwest corner of the site.

Infrastructure Improvements*Street Improvements*

Flint Street, which runs along the southern perimeter of the site, would be paved to a width of 40 feet along 330 feet of the Project site frontage.

Water & Sewer Improvements

The proposed Project would include the addition of new 8-inch water and sewer lines in the Silver Street right-of-way.

3.2.2 General Plan and Zoning

The City of Lake Elsinore General Plan land use designation for the Project site is Limited Industrial and the zoning designation for the site is Limited Manufacturing (M1). According to the Lake Elsinore General Plan, the Limited Industrial land use designation is intended for industrial parks, warehouses, manufacturing, research and development, public and quasi-public uses, and similar compatible uses. Heavy equipment sales is conditionally allowed in the M1 zone.

3.2.3 Construction and Phasing

Construction activities for the Project would occur over one phase and would occur within the hours allowable by the City of Lake Elsinore Municipal Code Section 17.176.080, which prohibits construction activities between the hours of 7:00 p.m. and 7:00 a.m. or at any time on weekends or on holidays.

3.2.4 Operational Characteristics

The Project site would continue to operate as a heavy construction equipment auction facility which holds six auctions per year. Leading up to each auction would be a ramp up phase where the equipment is delivered to the site and prepared for the sale day. The hours of operation during the ramp up phase would typically be 8:00 a.m. to 5:00 p.m. and the number of employees would range from 10 to 18. The next phase, the auction day, would start at approximately 7:00 a.m. with the sale lasting from roughly 9:00 a.m. to 4:30 p.m. Prior to Covid-19, the sale would typically draw about 250 bidders per sale. This number would be slightly less now since the applicant has put effort into developing a more robust online platform for clients. During this phase, the number of employees would peak at 25. The final phase would consist of collecting payment

for the sold items and assisting buyers with the load out and removal of the items. This phase would operate typically operate from 8:00 a.m. to 5:00 p.m. with 10 to 18 employees.

3.2.5 Discretionary Approvals, Permits, and Studies

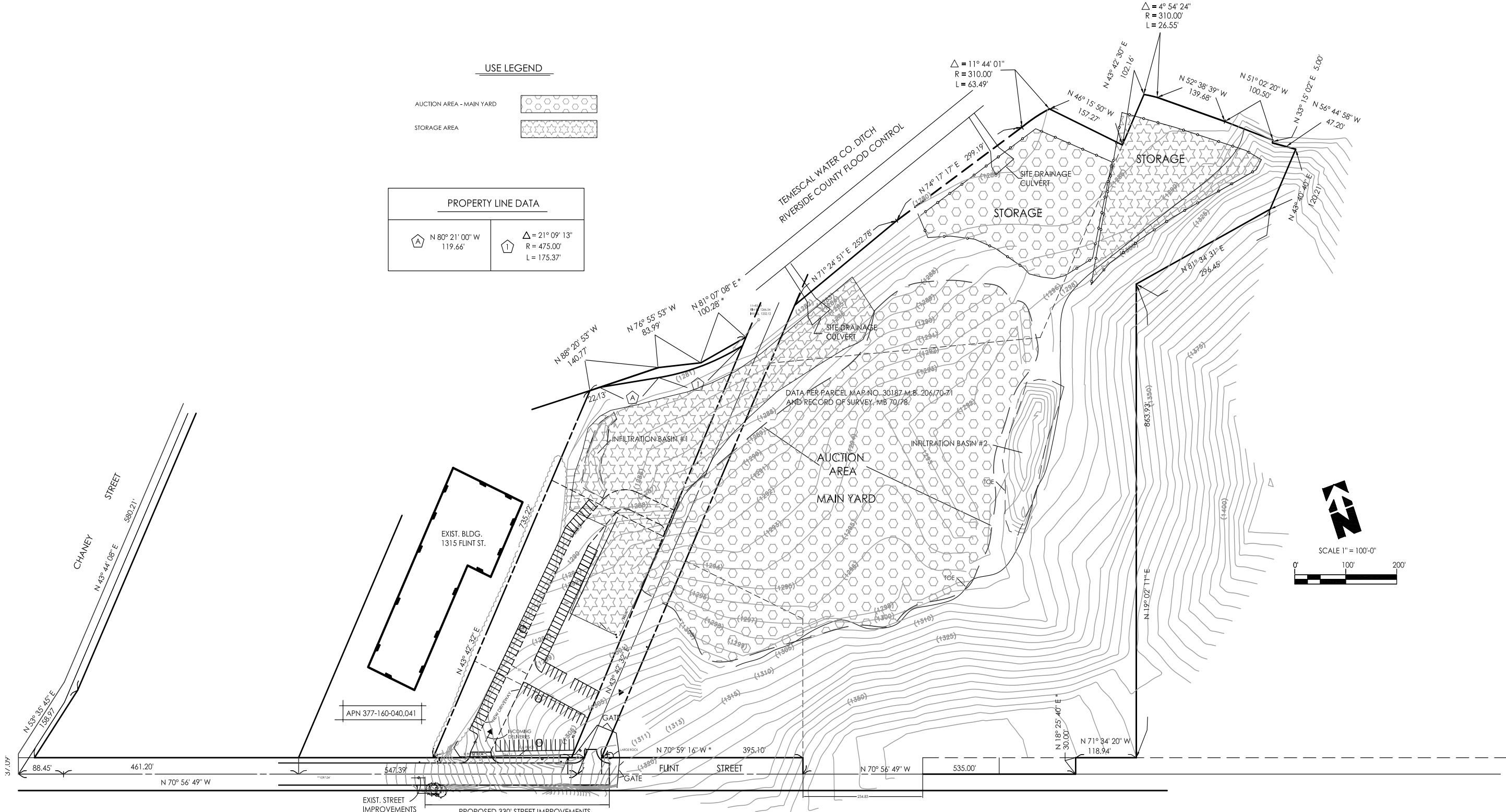
The following discretionary approval, permits, and studies are anticipated to be necessary for implementation of the proposed Project:

City of Lake Elsinore

- Approval of Class 1 - Existing Facilities Exemption and Common Sense Exemption
- Conditional Use Permit
- Development Permit

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Conceptual Site Plan



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4 ENVIRONMENTAL ANALYSIS

The discussion below compares the environmental impacts of the proposed Project to those identified in the existing conditions. The proposed Project is conditionally permitted in the zoning designation and would continue the existing operations held on the site.

The proposed Project includes the improvements of an existing heavy construction equipment auction facility with landscaping, infrastructure improvements, street improvements, infiltration basins, and the addition of an additional office trailer. To confirm that the Project would not constitute an expansion of use compared to the existing operations, this document analyzes the impacts of the proposed Project in regard to the following environmental issues:

- Aesthetics
- Agriculture
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology & Water Quality
- Land Use & Planning
- Mineral Resources
- Noise
- Population & Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities & Service Systems
- Wildfire

4.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

AESTHETICS

The Project site is currently developed and operates as a heavy construction equipment auctioning site. The proposed Project would continue the existing operations and uses of the site and would add to the character of the site with additional landscaping and street improvements. As such, it would not result in extensive changes that could result in the degradation of the character of the site, or impacts related to light and glare. Therefore, impacts related to aesthetics would be less than significant.

AGRICULTURE

The proposed Project would continue the existing operations and uses of the Project site which has already been graded. All improvements associated with the Project will take place on previously developed and disturbed areas of the site. According to the California Department of Conservation's California Important Farmland Finder map, the Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (CDC, 2021). However, a small northwest portion of the site is classified as Farmland of Local Importance. This area of the Project site is already graded and disturbed, has not been used recently for agricultural uses, and the Project will not further disrupt or degrade the soil in this area. Therefore, there will not be any agricultural impacts.

AIR QUALITY

Air Quality Management Plan. The Project site is located in the South Coast Air Basin, which is under the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD) in Source Receptor Area (SRA) Zone 25. The SCAQMD and Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and state Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin. In preparation of the AQMP, SCAQMD and SCAG use land use designations contained in General Plan documents to forecast, inventory, and allocate regional emissions from land use and development-related sources. For purposes of analyzing consistency with the AQMP, if a project's density is consistent with the General Plan, its emissions would be consistent with the assumptions in the AQMP, and the project would not conflict with SCAQMD's attainment plans. In addition, the SCAQMD considers projects consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation.

As discussed previously, the proposed Project would be consistent with the existing General Plan land use designation for the Project site and would continue the auction operations onsite. Additionally, as discussed below, Project emissions would be less than SCAQMD thresholds. As a result, the proposed Project would also be consistent with the assumptions in the AQMP and would not conflict with SCAQMD's attainment plans.

Construction Emissions. Construction activities associated with the proposed Project would generate pollutant emissions from activities related to the construction of street improvements, utility trenching, paving, and grading. It is mandatory for all construction projects to comply with SCAQMD Rules, including Rule 403 for controlling fugitive dust, PM₁₀, and PM_{2.5} emissions from construction activities. Rule 403 requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12-inches, and maintaining effective cover over exposed areas. Construction emissions would be negligible as it would comply with Rule 403 and include minor improvements to the existing facility which require minimum site preparation and limited exterior construction.

Table AQ-1 outlines the projected construction emissions that would occur as a result of the Project.

Table AQ-1: Construction Emission Estimates

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition	0.8	6.8	8.0	0.0	0.8	0.4
Grading	1.4	15.8	6.3	0.0	2.9	1.6
Trenching (Utilities)	1.2	9.4	14.6	0.0	0.8	0.5
Building Construction	0.8	7.4	8.1	0.0	0.7	0.4
Paving	0.9	6.8	9.3	0.0	0.5	0.4
Architectural Coating	6.2	1.4	2.0	0.0	0.1	0.1
Maximum Daily Emissions	6.2	15.8	14.6	0.0	2.9	1.6
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: EPD Solutions, 2022 (Appendix A)

Operational Emissions. Operational emissions from implementation from the proposed Project would result from customers and employees traveling to and from the site and from onsite operations. Emissions from the operation of the auction facility would be below the SCAQMD threshold for all critical pollutant emissions. Therefore, the Project would have a less than significant impact on air quality.

Table AQ-2 below outlines the operational emissions for the proposed Project.

Table AQ-2: Project Operational Emission Estimates

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	25.1	0.0	0.0	0.0	0.0	0.0
Energy	0.0	0.0	0.0	0.0	0.0	0.0
Mobile	1.1	1.7	14.4	0.1	10.9	1.7
Offroad	1.2	10.4	15.4	0.0	0.5	0.5
Total Proposed Operational Emissions	27.5	12.1	29.8	0.1	11.4	2.2
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: EPD Solutions, 2022 (Appendix A)

BIOLOGICAL RESOURCES

The proposed Project would consist of the addition of a third office trailer, the relocation of overhead powerlines, the creation of a parking lot, street improvements, and the maintenance of two existing infiltration basins. The disturbed developed areas on site would continue to be used as an auction area and storage areas would continue to be disturbed by heavy construction machinery. All proposed Project impacts would remain on the presently disturbed and developed land.

Multi-Species Habitat Conservation Plan (MSHCP). The Project is located within the Western Riverside County MSHCP Lake Elsinore Area Plan of the Western Riverside County MSHCP. The site is not located within a Criteria Cell or Cell Group, within plan-defined areas requiring surveys for narrow endemic plant species or criteria area species, nor located within plan-defined areas requiring surveys for amphibian species or mammalian species. However, the site is located within the Western Riverside County MSHCP burrowing owl (*Athene cunicularia*) survey area. As such, a burrowing owl habitat assessment was conducted onsite in August 2021 and determined that no burrowing owl signs were found on the site and that the area

was not in use by the species. Prior to any construction activity, a preconstruction survey would be required based on standard MSHCP requirements to ensure that no burrowing owls have colonized the site prior to Project activities.

Threatened and Endangered Plants. A total of 19 plant species are listed as state and/or federal Threatened, Endangered, or Candidate species; and are required to be reviewed under the Narrow Endemic Plan section of the Western Riverside MSHCP; or are Rare Plant Rank 1B.1 listed plants on the California Native Plant Society Rare Plant Inventory. Of the 19 species surveyed, no species were present on the Project site. However, Parry's spineflower (*Chorizanthe parryi* var: *parryi*) has the potential to be present due to suitable habitat being found onsite. However, suitable habitat for Parry's spineflower is located outside of the 17 acres of previously disturbed land that is utilized by the auction facility. As such, the Project would not result in impacts to threatened or endangered plants.

Threatened and Endangered Animals. A total of 28 animal species are listed as state and/or federal Threatened, Endangered, Candidate species and are required to be reviewed as well as other sensitive species which have the potential to occur. All sensitive species within a 5-mile radius of the site were reviewed. Of the 28 animal species surveyed, none were found to be present onsite though 11 species do have suitable habitat on the site and have the potential to be present and are as follows:

- Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*)
- Southern California legless lizard (*Anniella stebbinsi*)
- California glossy snake (*Arizona elegans occidentalis*)
- Orange-throated whiptail (*Aspidoscelis hyperythra*)
- Coastal whiptail (*Aspidoscelis tigris stejnegeri*)
- Dulzura pocket mouse (*Chaetodipus californicus femoralis*)
- San Diego black-tailed jackrabbit (*Lepus californicus bennettii*)
- San Diego desert woodrat (*Neotoma lepida intermedia*)
- Los Angeles pocket mouse (*Perognathus longimembris brevinasus*)
- Coast horned lizard (*Phrynosoma blainvillii*)
- Coast patch-nosed snake (*Salvadora hexalepis virgultea*)

However, suitable habitat for the 11 species that have potential to occur onsite is located outside of the 17 acres of previously disturbed land that is utilized by the auction facility. As such, the Project would not result in impacts to threatened or endangered animals.

Nesting Birds. The Project may result in a potential impact to nesting birds if any shrubs are removed from the site between February 1 and September 15. Migratory non-game native species are protected under the federal Migratory Bird Treaty Act. Additionally, Sections 2503, 3503.5, and 3513 of the California Fish and Game Code prohibit the take of all birds and their active nests. The site contains shrubs on site and adjacent trees that can be utilized by nesting birds. However, no trees or shrubs would be removed as part of Project construction and previously undisturbed habitat would not be disturbed. Therefore, the Project would not result in impacts to nesting birds.

Conclusion. The Project site contains approximately 7.57 acres of coastal sage scrub and 17 acres of disturbed developed area. The site does not contain any streams, drainages, or riparian habitat. Additionally, there are no wetlands or vernal pools. The proposed Project would remain in the 17 acres of disturbed land and no impacts would be made to undisturbed areas. Therefore, the Project would result in a less than significant impact to biological resources with the implementation of standard MSHCP requirements for pre-construction burrowing owl surveys.

CULTURAL RESOURCES

The proposed Project would continue the existing operations and uses of the Project site. The site has already been graded and disturbed and there are no historical buildings or resources located on the site. Therefore, the Project would not result in any impacts to cultural resources.

ENERGY

The operation of the Vantage Auctions site consumes electricity, natural gas, and petroleum. The energy consumption is provided in Table E -1 below.

Table E-1: Project Annual Operational Energy Requirements

Operational Source	Energy Usage	
Electricity (Kilowatt-Hours)		
General Office Building	16,321	
Parking	700	
Total	17,021	
Natural Gas (Thousands British Thermal Units)		
General Office Building	6,092	
Total	6,092	
Petroleum (gasoline) Consumption		
	Annual VMT/Total Hours of Use	Gallons of Gasoline Fuel
Mobile Consumption (VMT)	384,877	16,165
Utility Cart (Hours)	1,456	4,929
Total	-	21,094
Diesel Consumption		
	Annual Total Hours of Use	Gallons of Diesel Fuel
Forklifts	208	39
Off-Highway Trucks	208	628
Total	-	667

Source: EPD Solutions, 2022 (Appendix A)

The construction required for the addition of one mobile office trailer, trenching, grading, and paving would span two months. The energy consumption during construction would be minor and significantly less than the operation of the auction. Additionally, the energy consumption during construction onsite would be consistent with energy usage for construction projects throughout Southern California.

Operation of the auction with the improvements would consume 17,021 kilowatt-hours and 6,092 British thermal units (BTUs). The fuel consumption of the auction consists of 21,094 gallons of gasoline and 667 gallons of diesel fuel.

Operation of the of auction would comply with all the energy efficiency requirements under Title 24 and all applicable City energy codes. Therefore, the construction and operation of the Project would result in a less than significant impact related to inefficient, wasteful, or unnecessary energy use, and no mitigation would be required.

GEOLOGY/SOILS

The proposed Project site has been previously graded and would continue the existing activities on the site. Additionally, no clay soils have been historically mapped on the Project site. All improvements related to the Project would take place on the previously disturbed areas of the site. Therefore, there will not be impacts made related to geology and soils.

GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emissions: SCAQMD has convened a Greenhouse Gas Emissions (GHG) CEQA Significance Threshold Working Group to help lead agencies determine significance thresholds for GHG

emissions when SCAQMD is not the lead agency. The tiered approach, using Tier 1 to Tier 5, is used to evaluate potential GHG impacts from various uses and is equivalent to the existing consistency determination requirements in CEQA Guidelines Sections 15064(h)(3), 15125(d), or 15152(a). This assessment will apply the Tier 3: Numerical Screening Thresholds approach. Tier three consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project impact would be less than significant:

- Option 1: All land use types: 3,000 MT CO_{2e} per year
- Option 2: Based on land use type: residential: 3,500 MT CO_{2e} per year; commercial: 1,400 MT CO_{2e} per year; or mixed use: 3,000 MT CO_{2e} per year

The City of Lake Elsinore utilizes Option 1, and therefore the threshold is 3,000 MT CO_{2e} per year.

The Project's construction GHG emissions are shown in Table GHG-1, and the overall construction and operational emissions are shown in Table GHG-2. The emissions were calculated using the CalEEMod Model. The construction emissions are amortized over 30 years. As shown in Table GHG-2, the Project's GHG emissions are 249 MT CO_{2e} per year, below the 3,000 MT CO_{2e} per year. Therefore, the Project would have a less than significant GHG impact.

Table GHG-1: Proposed Project Net GHG Emissions

Activity	Annual GHG Emissions (MTCO _{2e})
2022	33
Total Emissions	33
Total Emissions Amortized Over 30 Years	1

Source: EPD Solutions, 2022 (Appendix A)

Table GHG-2: Proposed Total GHG Emissions

Activity	Annual GHG Emissions (MTCO _{2e})
Proposed Operational Emissions	
Area	0
Energy	3
Auto Mobile	118
Offroad	124
Waste	1
Water	2
Total Project Gross Operation Emissions	248
Project Construction Emissions	1
Total Emissions	249
Significance Threshold	3,000
Threshold Exceeded?	No

Source: EPD Solutions, 2022 (Appendix A)

HAZARDS AND HAZARDOUS MATERIALS

The proposed Project would occupy and modify the existing improvements on the site and consist of the addition of an office trailer, landscaping and other onsite improvements, and the repair of two infiltration basins. No activities involving hazardous emissions or materials would be involved with the Project, and no activities would impair adopted emergency response or evacuation plans. Therefore, there would be no impacts related to hazards and hazardous materials.

HYDROLOGY AND WATER QUALITY

The proposed Project would maintain the existing drainage culvert located at the northern end of the Project site and repair the two existing infiltration basins for standard maintenance. One is located along the western side of the site above the parking area and the second is located directly across to the west. The Project would continue to maintain the drainage outlets on the north side of the Project site that drain into the existing Temescal Water Company channel to the north of the site. The Project would improve the condition of the infiltration basins and therefore no impact would be made to hydrology and water quality.

LAND USE AND PLANNING

The proposed Project would continue the existing operations and uses of the Project site and obtain a Conditional Use Permit to comply with the City's Municipal Code. The Project would also align with the City's required development standards and keep with the character of the surrounding General Plan Land Use and Zoning designations. Therefore, any impact from the Project would be less than significant.

MINERAL RESOURCES

The proposed Project would continue all existing operations on the site and would not be used for mineral extractions. Additionally, the site has not been designated as a locally important mineral resource recovery site. Therefore, the Project would not result in any impact to mineral resources.

NOISE

The proposed Project would continue the existing use of the Project site which includes the operation of six heavy construction equipment auctions per year. Proposed activity on the site would remain consistent to the existing and therefore would not increase noise levels.

POPULATION AND HOUSING

The proposed Project would continue existing activities and operate with the existing number of employees currently on the site which is expected to peak at 25. The Project site is zoned as Limited Manufacturing and the Project vicinity is largely developed with industrial and institutional uses. The Project does not intend to increase the number of employees and therefore, the Project would not result in impacts to population and housing.

PUBLIC SERVICES

The proposed Project would continue the existing operations and use of the Project site and is not anticipated to grow the facility in terms of customers or employees. As such, the Project would not result in a change to acceptable service ratios and response times. Therefore, no impacts would be made to public services.

RECREATION

The Project is not proposing the creation of any recreational facility which may impact the natural environment, nor will it result in the physical deterioration of park facilities because the Project does not propose the construction of residential dwelling units. Therefore, the Project would not impact recreational facilities.

TRANSPORTATION

The proposed Project would add one additional office trailer to the facility, repair the existing infiltration basins, create a new driveway into the parking lot, street improvements along Flint Street, and other related

onsite improvements. Although modifications are being made to the site, no changes are proposed that would increase existing traffic to and from the site.

The Project trip generation was prepared using trip counts taken at the Project driveway on November 13, 2021, an auction day, to determine the daily and peak hour traffic volumes.

Table TR-1: Project Trip Generation

			Saturday			Weekday					
			Peak Hour (8:15 AM)			AM Peak Hour			PM Peak Hour		
Land Use	Units	Daily	In	Out	Total	In	Out	Total	In	Out	Total
<u>Previously Approved Land Use</u>											
Existing Site Counts ¹		468	59	10	69	18	0	18	0	18	18
<u>Vehicle Mix</u>²											
	<u>Percent</u>										
Passenger Vehicles	95.50%	447	57	9	66	18	0	18	0	18	18
2-Axle Trucks	3.80%	18	2	1	3						
3-Axle Trucks	0.40%	2	0	0	0						
4-Axle Trucks	0.20%	1	0	0	0						
	100%	468	59	10	69	18	0	18	0	18	18
<u>PCE Trip Generation</u>²											
	<u>PCE Factor</u>										
Passenger Vehicles	1.0	447	57	9	66	18	0	18	0	18	18
2-Axle Trucks	1.5	27	3	2	5						
3-Axle Trucks	2.0	4	0	0	0						
	3.0	3	0	0	0						
Total PCE Trip Generation		481	60	11	71	18	0	18	0	18	18

TSF = Thousand Square Feet

PCE = Passenger Car Equivalent

¹ Volumes for Daily and Saturday are from counts taken during an auction (which occurs bimonthly) on Saturday, November 13th, 2021.

² Vehicle splits for Daily and Saturday volumes are from counts taken during an auction (which occurs bimonthly) on Saturday, November 13th, 2021.

³ Passenger Car Equivalent (PCE) factors from San Bernardino County CMP, Appendix B - Guidelines for CMP Traffic Impact Analysis Reports in San Bernardino County, 2016

Source: Trip Generation and Parking Analysis, 2022 (Appendix B)

As shown in Table TR-1, the site currently generates 468 daily trips on auction day, including 69 trips during peak hour. With PCE (passenger car equivalent) used, the trip generation of the auction would be 481 daily trips including 71 trips during peak hour. On weekdays, the ramp up and ramp down operations would generate 18 trips during the AM peak hour and 18 trips during the PM peak hour. The Project is not expected to generate an increase in trips and therefore the current trips reflect the that of the proposed Project.

In addition, the Project proposes 330' of street improvements along Flint Street from the western side of the site to Silver Street. There are currently no street improvements along the site and therefore the Project would improve the existing conditions. The Project vicinity is served by the Riverside Transit Agency, including Bus Route 8 that has a stop at Graham and Langstaff roughly 0.7 miles southeast which would be available to transit users traveling to and from the Project site.

Overall, the proposed Project would not result in any significant impacts relating to transportation and would not be an expansion of use.

TRIBAL CULTURAL RESOURCES

The proposed Project site is currently graded and developed, and the Project would continue the existing activities on site. The Project would not result in any significant grading or ground disturbance to previously undisturbed land. As such, the Project would not cause a substantial adverse change in significance of a tribal cultural resource. Therefore, impacts would be less than significant.

UTILITIES AND SERVICE SYSTEMS

The proposed Project would include the installation of new 8-inch sewer and water lines through the site. The Project would not result in a greater impact on the existing infrastructure, but rather improve the infrastructure. Therefore, the project would not result in any impacts to the local utilities and service systems.

WILDFIRE

According to the CAL FIRE Fire Hazard Severity Zone map, the Project site is not located within an area identified as a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE, 2021). Additionally, the Project does not include the infrastructure that would exacerbate fire risk or that would result in impacts to the environment. As such, no impacts would occur.

5 Exceptions to Exemptions

In addition to investigating the applicability of CEQA Guidelines Section 15301 (Class 1) and Section 15061(b)(3), this CEQA document also assesses whether any of the exceptions to qualifying for the Class 1 categorical exemption for Existing Facilities are present. The following analysis compares the criteria of CEQA Guidelines Section 15300.2 (Exceptions) to the Project.

a. Criterion 15300.2(a): Location: Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The Project does not qualify for an exemption under Classes 3, 4, 5, 6 or 11. The Project is located within an urban developed area and is not located within a sensitive environment. In addition, the Project would not result in any impacts on an environmental resource of hazardous or critical concern. Therefore, the exception under criterion 15300.2(a) is not applicable.

b. Criterion 15300.2(b): Cumulative Impact: All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

As discussed previously, the Project is consistent with the land use designation identified in the General Plan. Thus, the proposed Project would be within the cumulative impacts analyzed for the Project site. In addition, there has not been a large number of similar industrial uses developed near the Project site over time in a way that such uses would combine with the Project to create a significant cumulative impact. Therefore, the exception under CEQA Guidelines Section 15300.2 (b) does not apply to the Project.

c. Criterion 15300.2(c): Significant Effects: A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

There are no known unusual circumstances that are applicable to the Project, and which may result in a significant effect on the environment. The proposed Project consists of the onsite and offsite improvements within a developed Project site that is served by utilities and transportation facilities. Furthermore, the proposed Project would not be constructing any permanent structures. The Project would be consistent with the City's General Plan and continue industrial use of the Project site. The proposed minor alterations and re-tenanting of the light industrial buildings would not introduce a new activity to the area that could result

in a significant effect on the environment. Therefore, the exception under CEQA Guidelines Section 15300.2(c) does not apply to the Project.

d. Criterion 15300.2(d): Scenic Highways: A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The Project site is not located along an officially designated scenic highway corridor. The closest Officially Designated State Scenic Highway is a portion of State Route 91 located approximately 28.4 miles northwest and State Route 74, located approximately 28.75 miles northeast of the Project site. Additionally, State Route 15, which is located roughly 0.17 miles northeast of the site, is an Eligible State Scenic Highway – Not Officially Designated. The Project site is not visible from State Route 74 or State Route 91. Additionally, much of the Project site is screened from State Route 15 by the slopes located on the northwest portion of the site. The site is visible along a portion of State Route 15, however a lack of current and proposed structures on the site prevent attention being drawn to the site and the Highway is not officially designated. Thus, development of the Project site would not result in impacts related to any scenic highway corridor. Therefore, the exception under CEQA Guidelines Section 15300.2(d) does not apply to the Project.

e. Criterion 15300.2(e): Hazardous Waste Sites: Hazardous Waste Sites: A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code or any other list compiled for purposes related to identifying the prior release of hazardous materials.

The Project site is not listed on the Department of Toxic Substance Control's Envirostor as being a cleanup site. The Project site is currently developed with existing trailers that would remain in place. Therefore, the exception under CEQA Guidelines Section 15300.2(e) does not apply to the Project.

f. Criterion 15300.2(f): Historical Resources: A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resources.

The Project site is currently developed as a heavy construction equipment auction facility and would continue existing activities. The site has no permanent structures and is not eligible for the California Register of Historic Resources. Additionally, the Project site is not located in a historic district. Thus, the Project would not destroy, demolish, or alter known historic resources. All construction would be confined to the Project site and would not alter undeveloped portions of the site. Project construction would not impair the significance of any historic structures. Therefore, the exception under CEQA Guidelines Section 15300.2(e) does not apply to the Project.

On the basis of the evidence provided above, the Project is eligible for a Class 1 Exemption in accordance with Section 15301, Existing Facilities, of the CEQA Guidelines. Furthermore, as discussed above, the Project would not result in any significant environmental impacts and would qualify for a Common Sense Exemption pursuant to Section 15061(b)(3) of the CEQA Guidelines. Because the proposed Project meets the criteria for categorically exempt existing facilities projects listed in CEQA Guidelines Section 15301, the Project would be eligible for a Common Sense Exemption as it would not have a significant effect on the environment. This analysis finds that a Notice of Exemption may be prepared for the Project.

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