



PENNINGTON INDUSTRIAL

PLANNING APPLICATION NO. 2018-49

TENTATIVE PARCEL MAP NO. 37710

INDUSTRIAL DESIGN REVIEW NO. 2019-01

**ENVIRONMENTAL REVIEW No. 2019-03
(INITIAL STUDY/MITIGATED NEGATIVE DECLARATION)**

Prepared By:

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Applicant:

FAIRWAY COMMERCIAL PARTNERS

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December 2019

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I. INTRODUCTION

A. PURPOSE

This document is an Initial Study for evaluation of environmental impacts resulting from implementation of Pennington Industrial Project. For purposes of this document, this application will be called the “proposed project”.

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT

As defined by Section 15063 of the California Environmental Quality Act (CEQA) Guidelines, an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration would be appropriate for providing the necessary environmental documentation and clearance for any proposed project.

According to CEQA Guidelines Section 15065, an **EIR** is deemed appropriate for a particular proposal if the following conditions occur:

- The project has the potential to: substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species; or eliminate important examples of the major periods of California history or prehistory.
- The project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The project has possible environmental effects that are individually limited but cumulatively considerable.
- The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

According to CEQA Section 21080(c)(1) and CEQA Guidelines Section 15070(a), a **Negative Declaration** can be adopted if it can be determined that the project will not have a significant effect on the environment.

According to CEQA Section 21080(c)(2) and CEQA Guidelines Section 15070(b), a **Mitigated Negative Declaration** can be adopted if it is determined that although the **Initial Study** identifies that the project may have potentially significant effects on the environment, revisions in the project plans and/or mitigation measures, which would avoid or mitigate the effects to below the level of significance, have been made or agreed to by the applicant.

This Initial Study has determined that the proposed project may result in potentially significant environmental effects but that said effects can be reduced to below the level of significance through the implementation of mitigation measures and therefore, a Mitigated Negative Declaration is deemed the appropriate document to provide the necessary environmental evaluations and clearance.

This Initial Study and Mitigated Negative Declaration are prepared in conformance with the California Environmental Quality Act of 1970 , as amended (Public Resources Code, Section 21000 *et seq.*); the State Guidelines for Implementation of the California Environmental Quality Act (“CEQA Guidelines”), as amended (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000, *et seq.*); applicable requirements of the City of Lake Elsinore; and the regulations, requirements, and procedures of any other responsible public agency or agency with jurisdiction by law.

The City of Lake Elsinore is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for carrying out or approving a project which may have significant effects upon the environment.

C. INTENDED USES OF INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

This Initial Study and Mitigated Negative Declaration are informational documents which are intended to inform the City of Lake Elsinore decision-makers, other responsible or interested agencies, and the general public of the potential environmental effects of the proposed project. 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 impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible agencies must balance adverse environmental effects against other public objectives, including economic and social goals (CEQA Guidelines Section 15021).

The City of Lake Elsinore City Council, as Lead Agency, has determined that environmental clearance for the proposed project can be provided with a Mitigated Negative Declaration. The Initial Study and Notice of Availability and Intent to Adopt prepared for the Mitigated Negative Declaration will be circulated for a period of 30 days for public and agency review. Comments received on the document will be considered by the Lead Agency before it acts on the proposed project.

D. CONTENTS OF INITIAL STUDY

This Initial Study is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed project.

I. INTRODUCTION presents an introduction to the entire report. This section identifies City

of Lake Elsinore contact persons involved in the process, scope of environmental review, environmental procedures, and incorporation by reference documents.

II. PROJECT DESCRIPTION describes the proposed project. A description of discretionary approvals and permits required for project implementation is also included.

III. ENVIRONMENTAL CHECKLIST FORM contains the City's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed project and those areas that would have either a potentially significant impact, a less than significant impact with mitigation incorporated, a less than significant impact, or no impact.

IV. ENVIRONMENTAL ANALYSIS provides the background analysis supporting each response provided in the environmental checklist form. Each response checked in the checklist form is discussed and supported with sufficient data and analysis. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation. In this section, mitigation measures are also set forth, as appropriate, that would reduce potentially significant adverse impacts to levels of less than significance.

V. MANDATORY FINDINGS presents the background analysis supporting each response provided in the environmental checklist form for the Mandatory Findings of Significance set forth in Section 21083(b) of CEQA and Section 15065 of the CEQA Guidelines.

VI. PERSONS AND ORGANIZATIONS CONSULTED identifies those individuals consulted and involved in the preparation of this Initial Study and Mitigated Negative Declaration.

VII. REFERENCES lists bibliographical materials used in preparation of this document.

E. SCOPE OF ENVIRONMENTAL ANALYSIS

For evaluation of environmental impacts, each question from the Environmental Checklist Form is stated and responses are provided according to the analysis undertaken as part of the Initial Study. All responses will take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts. Project impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

1. **No Impact:** A "No Impact" response is adequately supported if the referenced information sources show that the impact simply does not apply to the proposed project. A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. **Less Than Significant Impact:** Development associated with project implementation

will have the potential to impact the environment. These impacts, however, will be less than the levels of thresholds that are considered significant and no additional analysis is required.

3. **Less Than Significant With Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact”. The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.
4. **Potentially Significant Impact:** There is substantial evidence that the proposed project may have impacts that are considered potentially significant and an EIR is required.

F. TIERED DOCUMENTS, INCORPORATION BY REFERENCE, AND TECHNICAL STUDIES

Information, findings, and conclusions contained in this document are based on the incorporation by reference of tiered documentation and technical studies that have been prepared for the proposed project which are discussed in the following section.

1. Tiered Documents

As permitted in CEQA Guidelines Section 15152(a) 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 negative declarations 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.

Tiering is defined in CEQA Guidelines Section 15385 as follows:

“Tiering” refers to the coverage of general matters in broader EIRs (such as on general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs incorporating by reference the general discussions and concentrating solely on the issues specific to the EIR subsequently prepared. Tiering is appropriate when the sequence of EIRs is:

- (a) From a general plan, policy, or program EIR to a program, plan, or policy EIR of lesser scope or to a site-specific EIR;
- (b) From an EIR on a specific action at an early stage to a subsequent EIR or a supplement to an EIR at a later stage. Tiering in such cases is appropriate when it helps the Lead Agency to focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe.

Tiering also allows this document to comply with Section 15152(b) of the CEQA Guidelines, which discourages repetitive analyses, as follows:

“Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including general plans, zoning changes, and development projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration.”

Further, Section 15152(d) of the CEQA Guidelines states:

“Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

- (1) Were not examined as significant effects on the environment in the prior EIR; or
- (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions or other means.”

For this document, the “City of Lake Elsinore General Plan Update Final Recirculated Program Environmental Impact Report” certified December 13, 2011 (SCH #2005121019) serves as the broader document, since it analyzes the entire City area, which includes the proposed project site. However, as discussed, site-specific impacts, which the broader document (City of Lake Elsinore General Plan Update Final Recirculated Program Environmental Impact Report) cannot adequately address, may occur for certain issue areas. This document, therefore, evaluates each environmental issue alone and will rely upon the analysis contained within the Lake Elsinore General Plan Final EIR with respect to remaining issue areas.

2. Incorporation by Reference

An EIR or Negative Declaration may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the text of the EIR or Negative Declaration. (CEQA Guidelines Section 15150[a])

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San*

Francisco Ecology Center v. City and County of San Francisco [1975, 48 Ca.3d 584, 595]).

When an EIR or Negative Declaration incorporates a document by reference, the incorporation must comply with CEQA Guidelines Section 15150 as follows:

- Where part of another document is incorporated by reference, such other document shall be made available to the public for inspection at a public place or public building. The EIR or Negative Declaration shall state where the incorporated documents will be available for inspection. At a minimum, the incorporated document shall be made available to the public in an office of the Lead Agency. (CEQA Guidelines Section 15150[b])
- The incorporated part of the referenced document shall be briefly summarized where possible or briefly described if the data or information cannot be summarized. The relationship between the incorporated part of the referenced document and the EIR shall be described. (CEQA Guidelines Section 15150[c])
- This document must include the State identification number of the incorporated document (CEQA Guidelines Section 15150[d]).

3. Documents Incorporated by Reference/Technical Studies

a. The following document(s) is/are incorporated by reference:

- City of Lake Elsinore General Plan Update Final Recirculated Program Environmental Impact Report (“General Plan EIR”) (SCH #2005121019), certified December 13, 2011. The General Plan EIR, from which this document is tiered, addresses the entire City of Lake Elsinore and provides background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.

b. Various technical reports have been prepared to assess specific issues that may result from the construction and operation of the proposed project. As relevant, information from these technical reports has been incorporated into the Initial Study. The following technical reports are included as appendices to this Initial Study:

- *Appendix A - Air Quality Impact Analysis, Pennington Industrial Project, City of Lake Elsinore*, prepared by Urban Crossroads, dated July 10, 2019
- *Appendix B – Cultural Resources Inventory for the Pennington Project, Lake Elsinore, California*, prepared by DUDEK, dated November 4, 2019
- *Appendix C – Preliminary Geotechnical Interpretive Report Proposed Commercial Development, Assessor’s Parcel Number 377-160-014, South Corner of Chaney & West*

Minthorn Streets, City of Lake Elsinore, Riverside County, California, prepared by CW Soils, dated February 27, 2019

- *Appendix D - Environmental Site Assessment - Phase I, Undeveloped Property, APN: 377-160-014, Southern corner of West Minthorn Street and Chaney Street, Lake Elsinore, California 92530, prepared by California Environmental, dated July 2018*
- *Appendix E – Preliminary Drainage Report for Pennington Industrial, South Corner of Chaney & West Minthorn Streets, City of Lake Elsinore, Riverside County, California, prepared by SB&O Inc., dated May 17, 2019*
- *Appendix F - Project Specific Water Quality Management Plan, Pennington Industrial Park, prepared by SB&O Inc., dated February 27, 2019 (Revised May 17, 2019)*
- *Appendix G - Noise Impact Analysis, Pennington Industrial, City of Lake Elsinore, prepared by Urban Crossroads, dated July 23, 2019*
- *Appendix H – Greenhous Gas Analysis, Pennington Industrial Project, City of Lake Elsinore, prepared by Urban Crossroads, dated July 10, 2019*
- *Appendix I – Focused Traffic Evaluation, Pennington Industrial Project, City of Lake Elsinore, prepared by Urban Crossroads, dated July 29, 2019*
- *Appendix J - Service Planning Letter #3223-0, Elsinore Valley Municipal Water District, May 20, 2019*

c. The above-listed documents and technical studies are available for review at:

City of Lake Elsinore
Planning Division
130 S. Main Street
Lake Elsinore, California 92530

Hours: Mon-Thurs: 8 a.m. - 5 p.m.
Friday: 8 a.m. - 4 p.m.
Closed Holidays

II. PROJECT DESCRIPTION

A. PROJECT LOCATION AND SETTING

Development of the Pennington Industrial project (Project) would occur on a currently undeveloped site located at the southeasterly corner of Chaney Street and Minthorn Street in the City of Lake Elsinore (City) (**Figure 1, Vicinity Map** and **Figure 2, Project Site**). The approximately 5.01 acre¹ Project site is located within Section 31, Township 5 South, Range 4 West as shown on the *Elsinore, California* 7.5 minute U.S. Geologic Survey (USGS) topographic map. The subject property is relatively flat. The topographic elevation of the subject property ranges from approximately 1,282 to 1,285 feet above mean sea level.

The Project site is bounded by commercial and industrial land uses to the north and west, Lake Elsinore Unified School District and Ortega High School to the south, and Government offices to the east. **Table 1, On-site and Adjacent Land Use**, summarizes on-site and adjacent land use while **Figure 1** illustrates project location and **Figure 2** shows the existing site condition.

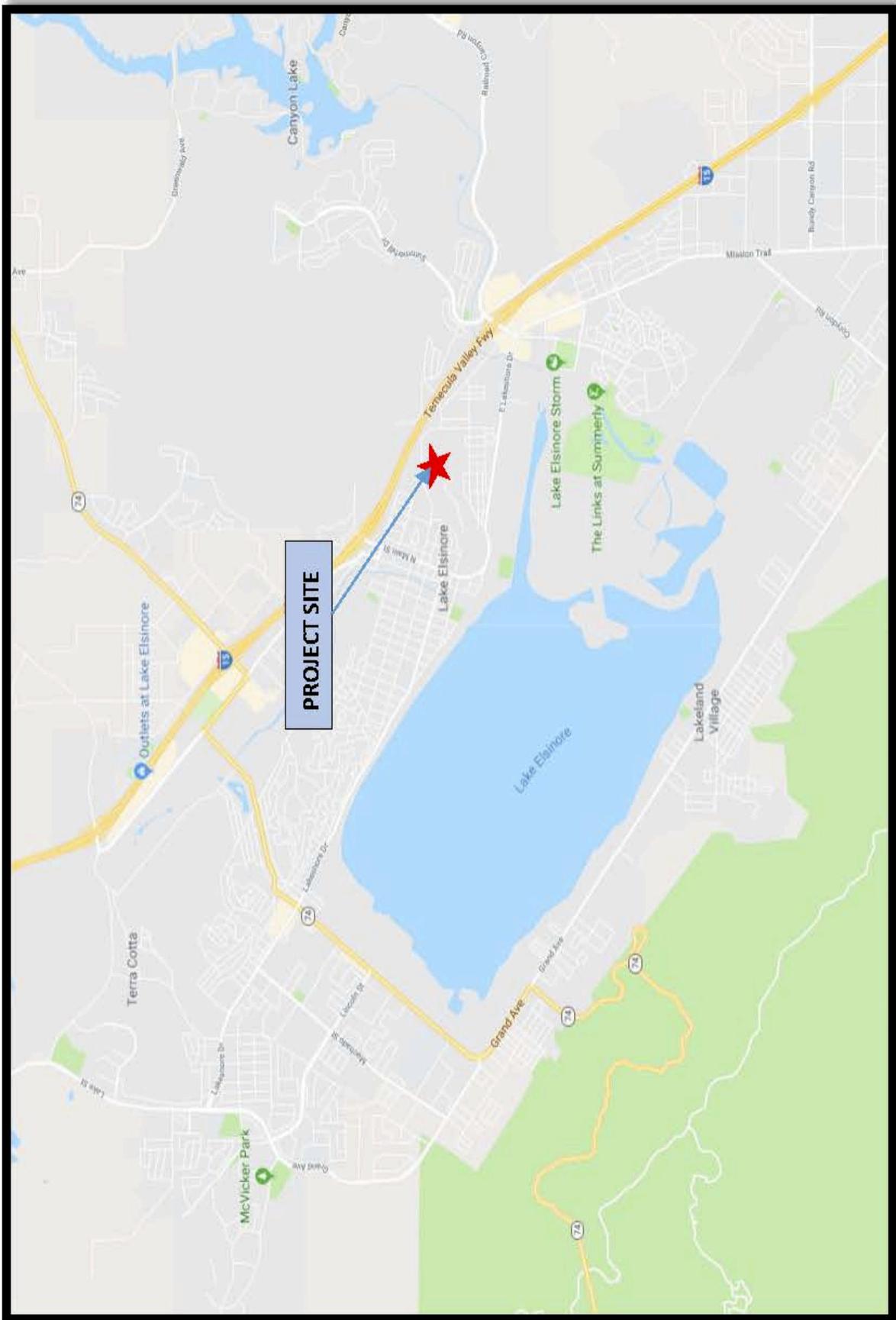
Table 1: On-site and Adjacent Land Use

	Land Use	General Plan	Zoning
On-site	Undeveloped	Limited Industrial (LI)	Limited Manufacturing (M-1)
North	Industrial	Limited Industrial (LI)	Limited Manufacturing (M-1)
South	School District	Public Institutional (PI)	Public Institutional (PI)
East	Government Offices	Limited Industrial (LI)	Limited Manufacturing (M-1)
West	Commercial	Limited Industrial (LI)	Commercial Manufacturing (C-M)

¹ Assessor Parcel No. 377-160-014

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Figure 1 – Vicinity Map



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Figure 2 – Project Site



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B. PROJECT DESCRIPTION

The Proposed Project consists of applications for a Tentative Parcel Map (TPM No. 37710) and Industrial Design Review (IDR No. 2019-01) which collectively are being processed under Planning Application No. 2018-49.

TPM No. 37710 is proposing to subdivide the 5.01 gross acre site into three (3) parcels that are 1.06 acres, 1.72 acres, and 2.01 acres, respectively (**Figure 4, Tentative Parcel Map**).

IDR No. 2019-01 is proposing to construct three (3) industrial buildings that are 91,140 square foot (SF) in total with 167 parking spaces (**Figure 3, Site Plan**). Building 1 will have 32,940 SF gross floor area, Building 2 will have 39,000 SF gross floor area, and Building 3 will have 19,200 SF gross floor area. Each building will consist of a planned open warehouse with truck access doors and a planned office area with mezzanine level. The Proposed Project would have a 0.44 floor area ratio (FAR) and 41 percent lot coverage. The maximum height of the buildings would be 30 feet. Hardscape, landscape, on-site stormwater management improvements, trash enclosure, and area lighting would be constructed as part of the Proposed Project.

It is anticipated that preparation of the site for construction will not require the import or export of soil from the Project site. Grading plans for the Project will be reviewed and approved by the City prior to the issuance of grading permits. All grading plans and activities will conform to the City grading ordinance and dust and erosion control requirements. The opening year for the project is anticipated to be 2021 and will take approximately 12 months to construct. There is an on-site man-made detention basin on the northeast corner of the site which will be removed during construction and replaced with on-site catch basins.

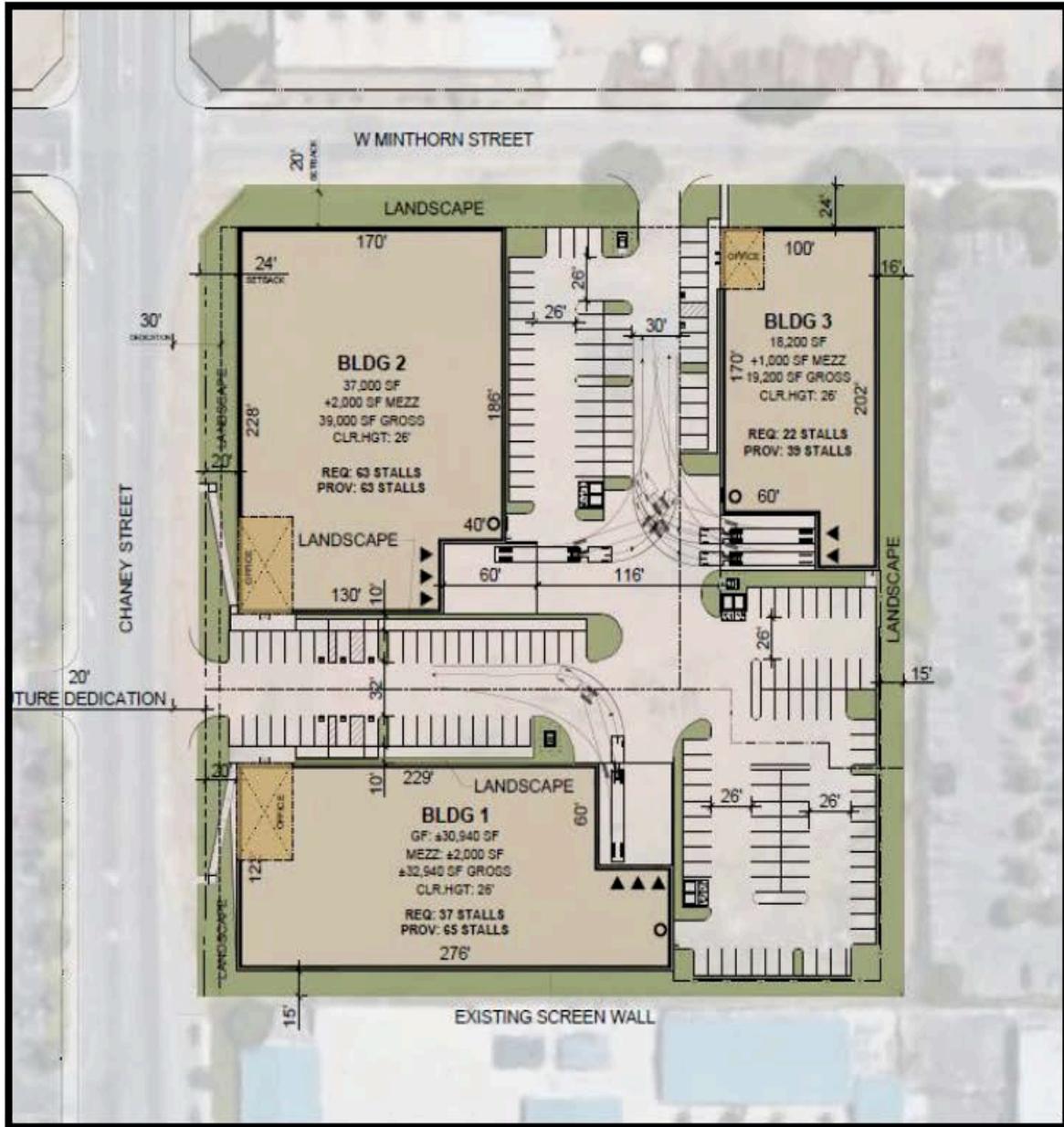
Two access driveways are proposed: (1) the northerly driveway to W. Minthorn Street, located 320 feet (curb return-to-curb return) east of Chaney Street, and (2) the westerly driveway located south of W. Minthorn Street, opposite the driveway of the adjacent property.

Proposed Improvements

Off-site improvements include streets, streetlights, striping, and connection to sewer, water, and utilities. On-site improvements include drainage, sewer, water, utilities, and grading.

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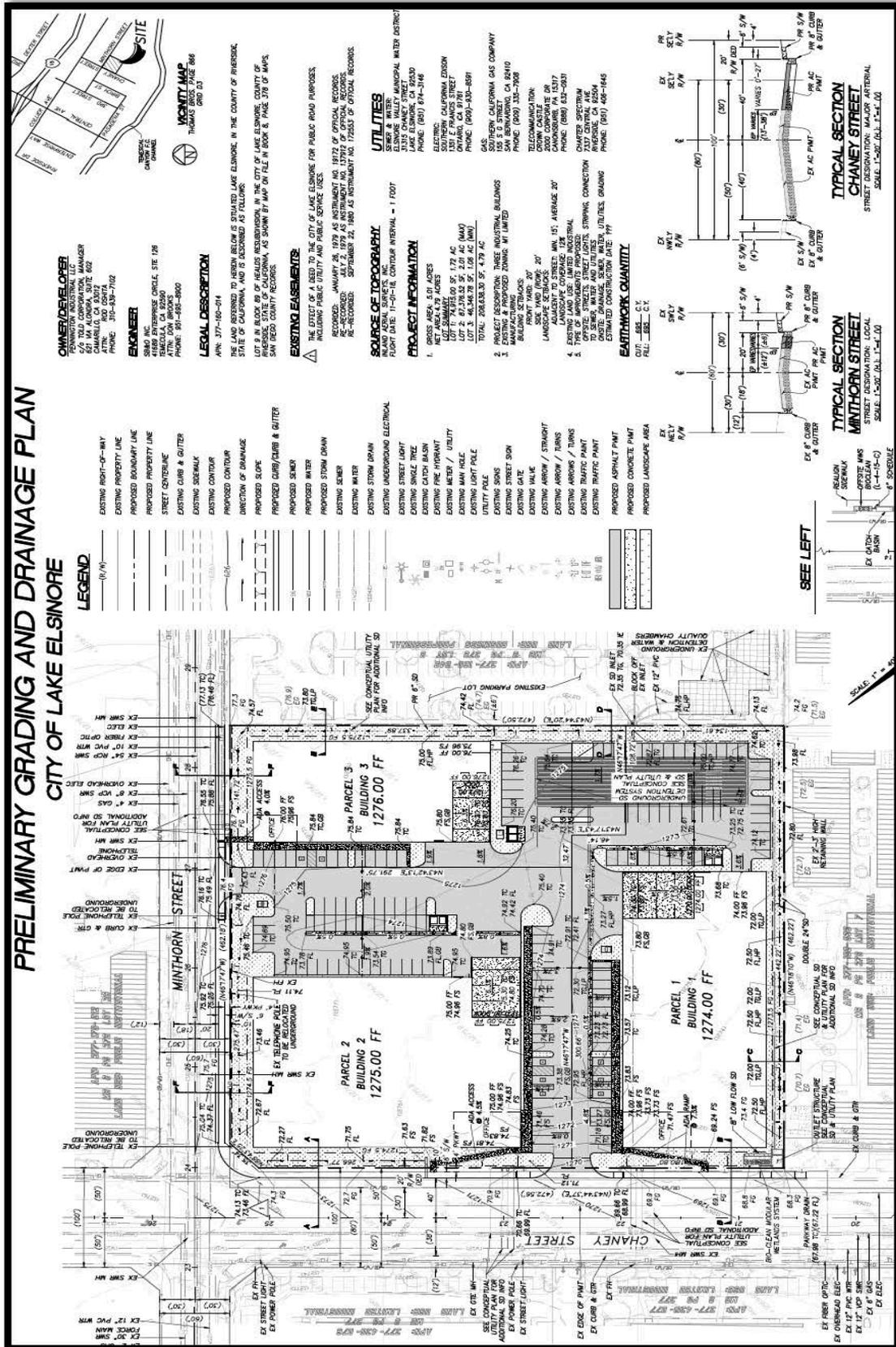
Figure 3 – Site Plan



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Figure 5 – Conceptual Grading Plan



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Figure 6 – Elevations Building 1



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Figure 7 – Elevations Building 2



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Figure 8 – Elevations Building 3



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III. ENVIRONMENTAL CHECKLIST

A. BACKGROUND

1. Project Title: Pennington Industrial

2. Lead Agency Name and Address:

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

3. Contact Person and Phone Number: Damaris Abraham, Senior Planner
(951) 674-3124

4. Project Location: : Undeveloped site located at the southeasterly corner of Chaney Street and Minthorn Street in the City of Lake Elsinore, County of Riverside; Assessor's Parcel Number [APN] 377-160-014.

5. Project Sponsor's Name and Address:

Fairway Commercial Partners, Inc.

Rod Oshita

1601 N. Sepulveda Blvd., #401

Manhattan Beach, CA 90266

6. General Plan Designation: Limited Industrial (LI)

7. Zoning: Limited Manufacturing (M-1)

8. Description of Project: TPM No. 37710 is proposing to subdivide the 5.01 gross acre site into three (3) parcels that are 1.06 acres, 1.72 acres, and 2.01 acres, respectively. IDR No. 2019-01 is proposing to construct three (3) industrial buildings that are 91,140 square foot (SF) in total with 167 parking spaces. The Proposed Project would have a 0.44 floor area ratio (FAR) and 41 percent lot coverage. The maximum height of the buildings would be 30 feet. Hardscape, landscape, on-site stormwater management improvements, trash enclosure, and area lighting would be constructed as part of the Proposed Project.

9. Surrounding Land Uses and Setting: The property consists of one (1) square shaped parcel of land that encompasses approximately 5.01 acres. The Project site is currently vacant with construction materials debris pile observed in the south corner of the site. The Project site is bounded by commercial and industrial land uses to the north and west, Lake Elsinore Unified School District and Ortega High School to the south, and Government offices to the east.

10. Other Public Agencies Whose Approval is Required: None

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?: In accordance with the requirements of Assembly Bill (AB) 52, the City sent notifications to six Native American Tribes traditionally and culturally affiliated with the project area on August 28, 2019. Of the tribes notified, the Rincon Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, and the Soboba Band of Luiseño Indians requested formal government-to-

government consultation under AB 52. Consultation was concluded on November 8, 2019 with Rincon and on December 13, 2019 with both Pechanga and Soboba. Due to the level of disturbance at the project site, it is very unlikely that intact archaeological resources are still present subsurface. No cultural resources have been recorded within the project site, and no resources were identified during the pedestrian survey. Standard mitigation measures have been added to address the unanticipated discovery of cultural resources and human remains during groundbreaking activities. Please see Section XVIII of the Initial Study Environmental Checklist for more detail.

B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

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

C. DETERMINATION

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


Damaris Abraham, Senior Planner

12/19/2019
Date

D. INITIAL STUDY CHECKLIST

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" 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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
CEQA Guidelines §15064.5?				
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VI. ENERGY. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous materials or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
basin?				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIII. NOISE. Would the project result in:				
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 other applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				
XIV. POPULATION AND HOUSING. 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XV. PUBLIC SERVICES. Would the project 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 of the public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public services/facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XVIII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) 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).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IV. ENVIRONMENTAL ANALYSIS

This section provides an evaluation of the impact categories and questions contained in the Environmental Checklist. A complete list of the reference sources applicable to the following source abbreviations is contained in Section VII, References, of this document.

I. AESTHETICS

a) Have a substantial adverse effect on a scenic vista? (Less than Significant Impact)

The most notable aesthetic resource in the City of Lake Elsinore (City) is Lake Elsinore itself, a 3,000-acre natural lake. The City's aesthetic setting is characterized by urbanized development of various densities occurring within varied topographical features and interspersed with undeveloped natural areas. Scenic resources within and surrounding the City include the lake, portions of the Cleveland National Forest, rugged hillside land, distant mountains and ridgelines, rocky outcroppings, streams, vacant land with native vegetation, parkland, and buildings of historical and cultural significance such as the cultural center, bathhouse, and military academy.

The Project site is currently vacant and is bounded by commercial and industrial land uses to the north and west, Lake Elsinore Unified School District and Ortega High School to the south, and Government offices to the east. The proposed Project is located approximately 0.90 mile north from Lake Elsinore (water body) and does not propose any building heights in excess of those that are allowed by the City's Zoning Code; building heights will be 30 feet. Views of the scenic resources within and surrounding the City as described above, are the prominent scenic vistas in the area. However, the Project will not impede any of these views. Thus, the proposed Project will not have a substantial adverse effect on a scenic vista. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR; Google Earth; Project Description)

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

The California Department of Transportation (Caltrans) currently identifies both I-15 and SR-74 as eligible for listing as state scenic highways, but they are not officially designated as such. The proposed Project is approximately 1.40 miles from SR-74 and approximately 0.20 miles from I-15. However, any potential visual impacts will be addressed through the City's design review process.

Additionally, the City has local ordinances that protect the City's streetscape and trees. The City's Municipal Code includes a City Tree Preservation Ordinance (Ord. 1256). There are no trees

currently located within the Project site. The proposed Project will comply with Ord. 1256 to ensure the preservation of trees and the local streetscape. The City of Lake Elsinore has also determined that certain species of palm trees in the family Palmaceae are locally significant resources through the City Significant Palm Tree Ordinance (Ord. 1160). However, no palms occur on the Project site. Thus, through compliance with local ordinances and the City's design review process, any potential impact to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway will be less than significant. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required

(Sources: General Plan EIR; LEMC)

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

According to mapping information from the Southern California Association of Governments (SCAG), which is based on U.S. Census data for urbanized areas, the Project Site is not located within an urbanized area. The Proposed Project would not substantially degrade the existing visual character or quality of the site and its surroundings. The Project site consists of a vacant parcel located in a mixed undeveloped and commercial area of the City. The site is surrounded by commercial and industrial land uses to the north and west, Lake Elsinore Unified School District and Ortega High School to the south, and Government offices to the east. The Proposed Project would include construction of construct three (3) industrial buildings that are 91,140 square foot (SF) in total with 167 parking spaces. No structures are being proposed that would diminish the existing visual character of the area or block views of the distant mountains and ridgelines. The Proposed Project is consistent with the intended land use for the area and meets development standards guiding the visual character of the site. The resulting aesthetic would be more organized, unified and urban, compared to the existing conditions. While the Proposed Project would markedly change the visual quality of the Project Site, it would not degrade the existing visual character or quality of the site or surroundings. Therefore, potential impacts associated with the visual character or quality of the site and its surroundings would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: Project Description; SGAG)

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

According to the City's General Plan, light and glare impacts to the Mount Palomar Observatory are of concern to the City. Areas of light pollution impacts have been identified through a "ring analysis," where primary impacts to the Observatory are within a 30-mile radius, and secondary impacts are up to 45 miles. According to the General Plan Figure 4.12, the Project site is within the 45-mile secondary impacts radius. The proposed Project would introduce light features to the vacant Project site. Accordingly, the new buildings and associated components would include lighting features typical of commercial developments, such as security lighting and indoor lighting. However, while the Proposed Project would introduce new sources of light, all lighting fixtures would comply with Lake Elsinore Municipal Code (LEMC) Section 17.112.040 Lighting (for Nonresidential Development). Section 17.112.040 requires all outdoor lighting fixtures in excess of 60 watts to be oriented and shielded to prevent direct illumination above the horizontal plane passing through the luminaire and prevent any glare or illumination on adjacent properties or streets. This section of the LEMC encourages the use of low-pressure sodium vapor lighting due to the City's proximity to the Mount Palomar Observatory.

The Proposed Project would also introduce new sources of daytime glare due to the new building surfaces and vehicles traveling to and from the site. However, the glare created by the proposed development would be consistent with the levels of glare that are emitted by the surrounding development. The Proposed Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, potential impacts associated with light or glare would be less than significant. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: LEMC, General Plan, Design Review Application)

II. AGRICULTURE AND FORESTRY RESOURCES

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (No Impact)

Agricultural uses constitute approximately 0.8 percent of the City's total acreage and are designated by the California Farmland Mapping and Monitoring Program (FMMP) as Farmland of Local Importance (554 acres within the City), Grazing Land (827 acres within the City), and Unique Farmland (25 acres within the City). Remaining land is considered Urban/Built-Up Land or Other Land, reflecting its developed uses or other characteristics making it unsuitable for agriculture. None of the farmland designations applied to land within the City or Sphere of Influence (SOI) is considered Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the State of California.

According to the California Department of Conservation California Important Farmland Finder,

the Project site consists of Urban/Built-Up Land. Thus, the proposed Project will not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, no impacts are anticipated.

Mitigation Measures: No mitigation measures are required.

(Sources: FMMP; General Plan EIR)

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? (No Impact)

The proposed Project is not located within or adjacent to a Williamson Act contract as there are no Williamson Act agricultural preserves located within the City. Additionally, the Project site is zoned Limited Manufacturing (M-1) and surrounded by commercial, manufacturing and public/institutional zoning designations. The Proposed Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. Thus, the proposed Project will not conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, no impacts are anticipated.

Mitigation Measures: No mitigation measures are required.

(Sources: DOC WA; General Plan EIR; Zoning Map)

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? (No Impact)

The proposed Project site is within the City of Lake Elsinore, which does not have zoning designated for forest land, timberland, or timberland zoned Timberland Production within City limits. Further, the site does not contain forestland or timberland. Thus, there is no conflict with existing zoning and no cause for rezoning of land related to forestland or timberland. Therefore, no impacts are anticipated.

Mitigation Measures: No mitigation measures are required.

(Sources: Zoning Map)

d) Result in the loss of forest land or conversion of forest land to non-forest uses? (No Impact)

As indicated in Section II(c), the City does not have a zoning designation for forest land, timberland, or timberland zoned Timberland Production within City limits. In addition, the Project Site is currently vacant and is bounded by commercial and industrial land uses to the north and west, Lake Elsinore Unified School District and Ortega High School to the south, and Government offices to the east. The Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest uses. Therefore, no impacts associated with forest land would occur.

Mitigation Measures: No mitigation measures are required.

(Sources: Zoning Map)

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? (No Impact)

Historical site utilization research indicates the subject property was undeveloped from at least 1938 until 2005. Light agricultural use is evident on air photos in the 1940s and 1950s. From 2009 until 2010, the property was utilized as a contractor's storage yard. The property is currently vacant. Any agricultural setting that may have existed around the Proposed Project area has been developed with modern commercial, industrial, and school structures.

No agricultural activities are presently occurring on-site. The existing condition on-site is vacant and undeveloped. The Proposed Project would be consistent with the existing zoning designation of Limited Manufacturing (M-1). The Proposed Project does not result in conversion of Farmland to non-agricultural use. Therefore, no impacts associated with farmland would occur.

Mitigation Measures: No mitigation measures are required.

(Sources: Phase I ESA - Appendix D; Project Description; Zoning Map)

III. AIR QUALITY

a) Conflict with or obstruct implementation of the applicable air quality plan? (Less than Significant Impact)

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

The Project site is located within the SCAB, which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743 square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the SCAG, county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards. Currently, these state and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the state and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce

emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

In March 2017, the AQMD released the Final 2016 AQMP. The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as, explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels (46). Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016 RTP/SCS, a planning document that supports the integration of land use and transportation to help the region meet the federal Clean Air Act requirements (20).

The SCAQMD CEQA Handbook states that "New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A Proposed Project would be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

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

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

Criterion 1 - Increase in the Frequency or Severity of Violations

Construction Impacts

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

Operational Impacts

As evaluated, the Project's regional and localized operational-source emissions would not exceed applicable regional significance threshold and LST thresholds. As such, a less than significant impact is expected.

Based on the information provided above, the Proposed Project would be consistent with the first criterion.

Criterion 2 - Exceed Assumptions in the AQMP

The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the City's General Plan is considered to be consistent with the AQMP.

Construction Impacts

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities.

Operational Impacts

The Project Site is designated as Limited Industrial (LI) in the Business District Plan and is zoned Light Manufacturing (M-1). The Proposed Project is consistent with the current land use designation and would not require a General Plan Amendment or zone change. The proposed Project consists of 91,140 square feet of manufacturing use, which is consistent with the site's Zoning designation and intensity. Additionally, the Project's construction and operational-source air pollutant emissions would not exceed the regional or localized significance thresholds. The Proposed Project would not exceed the AQMP assumptions for the Project Site and is found to be consistent with the AQMP for the second criterion.

The Project would not result in or cause NAAQS or CAAQS violations. The proposed Project is consistent with the land use and growth intensities reflected in the adopted General Plan. Furthermore, the Project would not exceed any applicable regional or local thresholds. Therefore, potential impacts associated with an inconsistency with the SCAQMD AQMP would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: AQ Analysis – Appendix A)

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

The Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds

for ozone precursors).

Cumulative projects include local development as well as general growth within the project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel throughout the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered would cover an even larger area. Accordingly, the cumulative analysis for the Proposed Project's air quality must be generic by nature. The project area is out of attainment for ozone and PM₁₀ and PM_{2.5} particulate matter. In accordance with CEQA Guidelines Section 15130(b), this analysis of cumulative impacts incorporates a three-tiered approach to assess cumulative air quality impacts.

- Consistency with the SCAQMD project specific thresholds for construction and operations;
- Project consistency with existing air quality plans; and
- Assessment of the cumulative health effects of the pollutants.

Consistency with Project Specific Thresholds

Construction Emissions

The Project Site is located in the South Coast Air Basin, which is currently designated by the EPA for federal standards as a non-attainment area for ozone and PM_{2.5} and by CARB for the state standards as a non-attainment area for ozone, PM₁₀, and PM_{2.5}. On October 17, 2017, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the California Emissions Estimator Model™ (CalEEMod™) v2016.3.2. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}) and greenhouse gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod™ has been used for this Project to determine construction and operational air quality emissions.

Construction activities associated with the Project will result in emissions of VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}. Construction related emissions are expected from site preparation, grading, building construction, paving, and architectural coating activities. The SCAQMD Rules that are currently applicable during construction activity for this Project include Rule 403 (Fugitive Dust) (2) and Rule 1113 (Architectural Coatings) (3).

The estimated maximum daily construction emissions without mitigation are summarized on Table 2. Under the assumed scenarios, emissions resulting from the Project construction will not exceed criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant.

Therefore, potential regional air quality impacts associated with construction of the Proposed Project would be less than significant.

Table 2: Overall Construction Emissions Summary

Year	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2020	4.17	42.47	22.10	0.05	10.07	6.02
2021	24.75	13.01	15.22	0.02	0.92	0.70
Maximum Daily Emissions	24.75	42.47	22.10	0.05	10.07	6.02
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

lbs/day – Pounds Per Day

Source: CalEEMod regional construction-source emissions are presented in Appendix 3.1.

Operational Emissions

Operational activities associated with the proposed Project will result in emissions of VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}. Operational emissions would be expected from the following primary sources: Area Source Emissions, Energy Source Emissions, and Mobile Source Emissions.

Area Source Emissions

Architectural Coatings - Over a period of time, the buildings that are part of this Project will be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of Project maintenance.

Consumer Products - Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants.

Landscape Maintenance Equipment - Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project.

Energy Source Emissions

Combustion Emissions Associated with Natural Gas and Electricity - Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity is generally excluded from the evaluation of significance and only natural gas use is considered.

Mobile Source Emissions

Vehicles - The Project related operational air quality impacts derive primarily from vehicle trips generated by the Project. Trip characteristics available from the *Pennington Industrial Project Focused Traffic Evaluation* (Traffic Evaluation) (Urban Crossroads, Inc., 2019) were utilized in this analysis.

In the last five years, the SCAQMD has provided numerous comments on the trip length for warehouse/distribution and industrial land use projects. The SCAQMD asserts that the model-default trip length in CalEEMod™ and the URBan EMISsions (URBEMIS) 2007 model (version 9.2.4) would underestimate emissions. It should be noted that for warehouse, distribution center, and industrial land use projects, most of the heavy-duty trucks would be hauling consumer goods, often from the POLA and POLB and/or to destinations outside of California. The SCAQMD states that for this reason, the CalEEMod™ and the URBEMIS model default trip length (approximately 12.6 miles) would not be representative of activities at like facilities. The SCAQMD generally recommends the use of a 40-mile one-way trip length.

Two separate model runs were utilized in order to more accurately model emissions resulting from vehicle operations. The first run analyzed passenger car emissions, which incorporated a default trip length of 16.6 miles for passenger cars, an assumption of 100% primary trips, and a fleet mix of 61.4% Light-Duty-Auto vehicles (LDA), 4.3% Light-Duty Trucks (LDT1)², 21.0% Light-Duty Trucks (LDT2)³, and 13.3% Medium-Duty Trucks (MDV). The second run analyzed truck emissions, which incorporated an average truck trip length of 40 miles, an assumption of 100% primary trips, and a fleet mix of 26.4% of Light-Heavy-Duty (LHD), 22.8% of Medium-Heavy-Duty (MHD), and 50.8% of Heavy-Heavy-Duty (HHD).

Fugitive Dust Related to Vehicular Travel - Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates.

Local CO Hotspot Impacts from Project-Generated Vehicular Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the State and Federal CO standards of 20 ppm over one hour or 9 ppm over eight hours.

At the time of the 1993 Handbook, the Air Basin was designated nonattainment under the CAAQS and NAAQS for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the Air Basin and in the state have steadily declined. In 2007, the Air Basin was designated in attainment for

² Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

³ Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

CO under both the CAAQS and NAAQS. SCAQMD conducted a CO hot spot analysis for attainment at the busiest intersections in Los Angeles during the peak morning and afternoon periods and did not predict a violation of CO standards⁴. Since the nearby intersections to the Proposed Project are much smaller with less traffic than what was analyzed by the SCAQMD, no local CO Hotspot are anticipated to be created from the Proposed Project and no CO Hotspot modeling was performed. Therefore, potential long-term local air quality impacts associated with operation would be less than significant.

On-Site Equipment Emissions

It is common for industrial buildings to require cargo handling equipment to move empty containers and empty chassis to and from the various pieces of cargo handling equipment that receive and distribute containers. The most common type of cargo handling equipment is the yard truck which is designed for moving cargo containers. Yard trucks are also known as yard goats, utility tractors (UTRs), hustlers, yard hostlers, and yard tractors. The cargo handling equipment is assumed to have a horsepower (hp) range of approximately 175 hp to 200 hp. Based on the latest available information from SCAQMD (40); for example, high-cube warehouse projects typically have 3.6 yard trucks per million square feet of building space. For this particular Project, based on the maximum square footage of manufacturing use permitted by the proposed Project, on-site modeled operational equipment includes one (1) 200 hp, compressed natural gas-powered yard tractors operating at 4 hours a day for 365 days of the year.

Table 3 summarizes the Project’s daily regional emissions from on-going operations. During operational activity, the Project will not exceed any of the thresholds of significance. Therefore, potential regional air quality impacts associated with the operation would be less than significant.

Table 3: Summary of Operational Emissions

Operational Activities – Summer Scenario	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	2.09	2.90E-04	0.03	0.00	1.10E-05	1.00E-05
Energy Source	0.09	0.80	0.67	4.77E-03	0.06	0.06
Mobile Source (Passenger Cars)	1.07	1.66	21.83	0.07	7.42	1.99
Mobile Source (Trucks)	0.50	16.89	4.03	0.07	2.58	0.78
On-Site Equipment	0.14	1.55	0.77	3.17E-03	0.05	0.05
Total Maximum Daily Emissions	3.88	20.90	27.32	0.15	10.11	2.88
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

⁴ The four intersections analyzed by the SCAQMD were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning and LOS F in the evening peak hour.

Operational Activities – Winter Scenario	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	2.09	2.90E-04	0.03	0.00	1.10E-05	1.00E-05
Energy Source	0.09	0.80	0.67	4.77E-03	0.06	0.06
Mobile Source (Passenger Cars)	0.85	1.71	17.46	0.07	7.42	1.99
Mobile Source (Trucks)	0.51	17.40	4.19	0.07	2.58	0.78
On-Site Equipment	0.14	1.55	0.77	3.17E-03	0.05	0.05
Total Maximum Daily Emissions	3.67	21.45	23.12	0.15	10.11	2.88
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: CalEEMod regional operational-source emissions are presented in Appendices 3.2 and 3.3.

Mitigation Measures: No mitigation measures are required.

(Sources: AQ Analysis – Appendix A)

c) Expose sensitive receptors to substantial pollutant concentrations? (Less than Significant Impact)

The analysis makes use of methodology included in the SCAQMD *Final Localized Significance Threshold Methodology* (LST Methodology) (41). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as Localized Significance Thresholds (LSTs). The significance of localized emissions impacts depends on whether ambient levels in the vicinity of any given project are above or below State standards.

LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. Receptor locations are off-site locations where individuals may be exposed to emissions from Project activities.

Residential Receptors

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as “sensitive receptors”; they are also known to be locations where an individual can remain for 24 hours.

Non-Residential Receptors

As per the *LST Methodology*, commercial and industrial facilities are not included in the definition

of sensitive receptor because employees do not typically remain onsite for a full 24 hours but are typically onsite for eight hours. However, it should be noted that the *LST Methodology* explicitly states that “LSTs based on shorter averaging periods, such as the NO₂ and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours (41).” Consistent with the SCAQMD’s Final LST Methodology, the nearest industrial or commercial use to the Project site was used to determine operational and construction air impacts for emissions of NO₂ and CO.

Project-related Sensitive Receptors

Sensitive receptors in the Project study area include existing residential homes, industrial uses, and Ortega High School. The SCAQMD recommends that the nearest sensitive receptor be considered when determining the Project’s potential to cause an individual and cumulatively significant impact. As such, the nearest residential receptor to the Project site is located approximately 916 feet/279 meters west Project site on Collier Avenue. Alternatively, the nearest non-residential receptor is an industrial building located 60 feet/18 meters north of the Project site on Minthorn Street. For purposes of analysis, a 279-meter receptor distance is utilized as a screening threshold to determine LSTs for emissions of PM₁₀ and PM_{2.5}. It should be noted that although the nearest non-sensitive receptor is 18-meters from the Project site, the *LST Methodology* explicitly states that “LSTs base on shorter averaging periods, such as the NO₂ and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours (41).” As such a 25-meter receptor distance was used for NO₂ and CO.

Table 4 identifies the localized impacts at the nearest receptor location in the vicinity of the Project. As shown, Project construction-source emissions would not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. Thus, a less than significant impact would occur for Project-related construction-source emissions and no mitigation is required.

Table 4: Localized Significance Summary of Construction

On-Site Site Preparation Emissions	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	42.42	21.51	9.86	5.96
SCAQMD Localized Threshold	198	925	100	39
Threshold Exceeded?	NO	NO	NO	NO
On-Site Grading Emissions	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	26.39	16.05	4.04	2.51
SCAQMD Localized Threshold	162	750	96	37
Threshold Exceeded?	NO	NO	NO	NO

Source: CalEEMod localized construction-source emissions are presented in Appendix 3.1.

Table 5 shows the calculated emissions for the Project’s operational activities compared with the applicable LSTs. The LST analysis includes on-site sources only; however, the CalEEMod™ model outputs do not separate on-site and off-site emissions from mobile sources. In an effort to establish a maximum potential impact scenario for analytic purposes, the emissions shown on Table 5 represent all on-site Project-related stationary (area) sources and five percent (5%) of the Project-related mobile sources.

As shown on Table 5, operational emissions will not exceed the LST thresholds for the nearest sensitive receptor. Thus, a less than significant impact would occur for Project-related operational-source emissions and no mitigation is required.

Table 5: Localized Significance Summary of Operations

Operational Activity	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	3.30	2.77	0.61	0.25
SCAQMD Localized Threshold	361	1,904	30	13
Threshold Exceeded?	NO	NO	NO	NO

Source: CalEEMod localized operational-source emissions are presented in Appendices 3.2 and 3.3.

Mitigation Measures: No mitigation measures are required.

(Sources: AQ Analysis – Appendix A)

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

The potential for the Project to generate objectionable odors has also been considered. Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities.

The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project’s (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City’s solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required

Mitigation Measures: No mitigation measures are required.

(Sources: AQ Analysis – Appendix A)

IV. BIOLOGICAL RESOURCES

- 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 Game or U.S. Fish and Wildlife Service? (Less than Significant Impact with Mitigation Incorporated)**

The site is located in the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) area, but not in a Criteria Cell or Survey Area and is dominated by low-growing vegetation. According to an *Environmental Site Assessment - Phase I* prepared by California Environmental in July 2018, the subject property has been previously disturbed and was used as a contractor's storage yard. The property is currently vacant. A construction materials debris pile was observed in the south corner of the site. Due to the numerous disturbances of the proposed Project site, there is little habitat value for the MSHCP and other special status species. The Project site is located within an MSHCP survey area for burrowing owl (*Athene cunicularia*). The burrowing owl (BUOW) is listed as a California Species of Concern as designated by the California Department of Fish and Wildlife (CDFW), and is a conditionally covered species in the MSHCP. Therefore, mitigation measure **MM Bio 1** will be implemented to conduct preconstruction focused species surveys for burrowing owl within 30-days prior to any ground-disturbing activities at the project site where suitable habitat is present. With the implementation of mitigation measure **MM Bio 1**, impacts to BUOW would be less than significant.

Mitigation Measures:

MM Bio 1: *Burrowing Owl Surveys.* Due to the presence of suitable habitat onsite for the western burrowing owl, a qualified biologist shall conduct pre-construction focused species surveys within 30-days prior to any ground disturbing activities at the project site where suitable habitat is present. If burrowing owls are determined to occupy the project site during preconstruction surveys, CDFW shall be consulted and a passive relocation program shall be undertaken to relocate owls to an area outside the impact zone. The relocation shall be conducted following accepted protocols and would occur outside of the breeding season for the burrowing owl. Existing burrows shall be destroyed once they are vacated.

(Sources: WR-MSHCP; RC GIS; Phase I ESA - Appendix D)

- 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 Game or U.S. Fish and Wildlife Service? (Less than Significant Impact)**

A variety of drainages cross the City of Lake Elsinore originating from the surrounding hills and generally draining towards Lake Elsinore. According to the United States Fish and Wildlife Service, wetlands are present within the City primarily around Lake Elsinore. However, the project site does not contain any riparian habitat or other sensitive natural community. These impacts were analyzed in the City of Lake Elsinore's General Plan EIR and were determined to be less than significant with the implementation of existing Federal and State programs, in particular Sections 401 and 404 of the U.S. Clean Water Act and Section 1602 of the California Fish and Game Code. The majority of the project site is dominated by disturbed habitat and non-native grasslands. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR)

- 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? (No Impact)**

There are no waters of the United States or waters of the State within the project site. There are also no marshes, vernal pools, or coastal waters within the project site. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan 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? (Less than Significant Impact)**

The Project site consists of undeveloped land consisting of seasonal nonnative grass communities. The project site is surrounded by commercial and industrial land uses to the north and west, Lake Elsinore Unified School District and Ortega High School to the south, and Government offices to the east.

The Project area setting, which once consisted of agricultural and vacant land, has been significantly compromised by increased development. Due to this prior development in the local vicinity of the proposed Project, no wildlife movement or crossing occurs on the Project site, and the Project area does not provide topographic or vegetative features that function as a wildlife movement corridor, habitat linkage or nursery site. Thus, the proposed Project does not substantially interfere 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. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: Site Visit; Phase I ESA - Appendix D)

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Less than Significant Impact with Mitigation Incorporated)

Chapter 5.120 of the City of Lake Elsinore Municipal Code (Municipal Code) is referred to as the Tree Preservation Ordinance. This Chapter protects City trees, park trees and street trees within public areas owned by the City. The project site does not contain any trees protected under Chapter 5.120 of the Municipal Code and therefore, the project will have no impact. Additionally, Chapter 5.116 of the Municipal Code protects Significant Palm Trees within the City limits. This Chapter provides a mechanism to regulate the removal, destruction and relocation of significant palm trees. No palm trees occur within the project site and therefore, there will be no impact to Significant Palm Trees. Lastly, Chapter 19.04 of the Municipal Code is referred to as the Habitat Conservation Ordinance. The purpose of the ordinance is to implement the Stephens' Kangaroo Rat Habitat Conservation Plan (SKRHCP). The project site is located within the fee area for the SKRHCP. Potential project impacts to the SKRHCP are discussed in Section IV.F below. There will be no impact on any local policies or ordinances protecting biological resources.

Mitigation Measures:

MM Bio 2: *MSHCP Fees.* Prior to issuance of a grading permit, the applicant/developer shall pay the Western Riverside County Multiple Species Habitat Conservation Plan (WRMSHCP) development mitigation fees, in effect at the time permits are issued.

MM Bio 3: *SKR Fees.* Prior to issuance of a grading permit, the applicant/developer shall pay the Stephens' Kangaroo Rat Habitat Conservation Plan (SKRHCP) fees, in effect at the time permits are issued.

(Sources: LEMC)

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (Less than Significant with Mitigation Incorporated)

The project is located within the boundaries of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). As such, a habitat assessment and consistency analysis is required to evaluate the project with respect to consistency with the MSHCP. A review of the Riverside County Integrated Project (RCIP) Conservation Summary Report Generator for the project site APN determined that the site is located within the Elsinore Area Plan of the MSHCP. Additionally, the project site is not located within a Criteria Cell, Cell Group, Existing Core Area, proposed Core Area, existing linkage, or a proposed linkage. The project site is located within a

required survey area for burrowing owl, as discussed above in Section IV.A. Because the project site is located within the MSCHP boundary, it may have a substantial effect and requires mitigation. Additionally, the project site occurs within the boundaries of the SKRHCP. However, the project site is not located within the core reserve area, and therefore, the proposed project site may have a substantial effect on the SKRHCP, but will not affect any core reserve areas. Payment of the SKRHCP fee is required for project sites that occur within the SKRHCP area. The payment of the fee allows the City to implement the terms of the Section 10(a) permit and management authorization.

Mitigation Measures:

MM Bio 1: *Burrowing Owl Surveys.* Defined in Item IV.a, above.

MM Bio 2: *MSHCP Fees.* Defined in Item IV.e, above.

MM Bio 3: *SKR Fees.* Defined in Item IV.e, above.

(Sources: WR-MSHCP; RC GIS; LEMC)

V. CULTURAL RESOURCES

a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5? (Less than Significant with Mitigation Incorporated)

The *Cultural Resources Inventory Report* prepared for the Project by Dudek, dated November 4, 2019 (Appendix B) included a historical records search at the Eastern Information Center (EIC) on October 18, 2019 for the proposed project site and surrounding one-mile radius. EIC records indicate that 43 previous cultural resource investigations have been performed within one mile of the project area, of which only one addressed the project site (RI-3725), with two adjacent (RI-5820 and RI-6728). The RI-3725 is the only study within the project area, and addressed both archaeological and historic built environment resources as part of a Phase 1 study prior to the Chaney Business center development. The two adjacent reports were focused on the property immediately adjacent to the southwest, and constituted a Phase I survey and evaluation of a single historic property. The property was found ineligible for the CRHP and has since been demolished.

In the event that cultural resources (including historical, archaeological, and tribal cultural resources) are inadvertently discovered during ground-disturbing activities, **MM Cul 1** requires work to be halted within 100 feet of the discovery until it can be evaluated by a qualified archaeologist, the Native American tribal representative(s) from consulting tribes (or other appropriate ethnic/cultural group representative), and the Community Development Director or their designee to discuss the significance of the find. Construction activities may continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation or resource recovery, may be warranted and would be discussed in consultation with the

appropriate regulatory agency and/or tribal group. With implementation of **MM Cul 1**, potential impacts to historical resources would be less than significant.

Mitigation Measures:

MM Cul 1: *Unanticipated Resources.* The developer/permit holder or any successor in interest shall comply with the following for the life of this permit. If during ground disturbance activities, unanticipated cultural resources are discovered, the following procedures shall be followed:

1. All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted until a meeting is convened between the developer, the Project Archaeologist, the Native American tribal representative(s) from consulting tribes (or other appropriate ethnic/cultural group representative), and the Community Development Director or their designee to discuss the significance of the find.
2. The developer shall call the Community Development Director or their designee immediately upon discovery of the cultural resource to convene the meeting.
3. At the meeting with the aforementioned parties, the significance of the discoveries shall be discussed and a decision is to be made, with the concurrence of the Community Development Director or their designee, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resource.
4. Further ground disturbance shall not resume within the area of the discovery until a meeting has been convened with the aforementioned parties and a decision is made, with the concurrence of the Community Development Director or their designee, as to the appropriate mitigation measures.

(Sources: General Plan EIR; Site Visit; Phase I Cultural Report - Appendix B)

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5? (Less than Significant with Mitigation Incorporated)

The Cultural Resources Inventory Report prepared for the Project by Dudek, dated November 4, 2019 (Appendix B) included a historical records search at the Eastern Information Center (EIC) on October 18, 2019 for the proposed project site and surrounding one-mile radius. The EIC records identified one hundred fifty-four cultural resources were within a one-mile radius of the project site, although none are within the project site. One historic district (P-33-007143) is located within the one-mile radius. The Lake Elsinore Historic Downtown district is located approximately ¼ mile to the south from the project area. This district contained 122 resources within one mile of the project; however, none are within the project area and will not be impacted by the project. Outside of the historic district the remaining resources include 22 historic structures, three historic sites, two historic isolates, and four prehistoric isolates.

Dudek Archaeologist conducted an intensive pedestrian survey on October 23, 2019 using standard archaeological procedures and techniques. No cultural resources were identified during the pedestrian survey. The entire project site has been disturbed through previous development. A school complex currently occupies the area to the southwest of the site, with the associated modern debris and trash on the surface of the project area. No undisturbed, native sediments were observed. Inspection of rodent burrows and spoils in the vegetation planters identified only fill sediments comprised primarily of decomposed granite. However, there still remains the possibility that undiscovered buried archaeological resources might be encountered during construction. The City prepared consultation invitation letters to the Native American Tribes on the City's AB52 consultation list that were mailed on August 28, 2019. The City received a response from three tribes, and a summary of the consultation is provided in Section XVIII, Tribal Cultural Resources.

In the event that cultural resources (including historical, archaeological, and tribal cultural resources) are inadvertently discovered during ground-disturbing activities, **MM Cul 1** has been included to require work to be halted within 100 feet of the discovery until it can be evaluated by a qualified archaeologist, the Native American tribal representative(s) from consulting tribes (or other appropriate ethnic/cultural group representative), and the Community Development Director or their designee to discuss the significance of the find. Construction activities may continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation or resource recovery, may be warranted and would be discussed in consultation with the appropriate regulatory agency and/or tribal group. With implementation of **MM Cul 1**, potential impacts associated with archeological resources would be less than significant.

Mitigation Measures:

MM Cul 1: *Unanticipated Resources.* Defined in Section V.a. above.

(Sources: General Plan EIR; Site Visit; Phase I Cultural Report - Appendix B)

c) Disturb any human remains, including those interred outside of formal cemeteries? (Less than Significant with Mitigation Incorporated)

There are no cemeteries located within the proposed Project boundary. In the event human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Thus, with adherence to existing regulatory requirements and implementation of mitigation measure **MM Cul 2**, the Project is not anticipated to disturb any human remains. Therefore, impacts are less than significant with mitigation.

Mitigation Measures:

MM Cul 2: *Discovery of Human Remains.* In the event that human remains (or remains that may be human) are discovered at the project site during grading or earthmoving, the construction contractors, project archaeologist and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The project applicant shall then inform the Riverside County Coroner and the City of Lake Elsinore Community Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b). Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains and that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. If human remains are determined to be Native American, the applicant shall comply with the state law relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC within 24 hours and the NAHC will make the determination of most likely descendant. The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resource Code Section 5097.98. In the event that the applicant and the MLD are in disagreement regarding the disposition of the remains. State law will apply and the mediation process will occur with the NAHC, if requested (see PRC Section 5097.98(e) and 5097.94(k)).

According to the California Health and Safety Code, six or more human burial at one location constitutes a cemetery (Section 81 00), and disturbance of Native American cemeteries is a felony (Section 7052).

(Sources: General Plan EIR; Site Visit; Phase I Cultural Report - Appendix B)

VI. ENERGY

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

The Property Owner/Developer would comply with all applicable regulations related to construction and operation of the Proposed Project, including the City of Lake Elsinore building code, the MHSCP (Section IV), the Climate Action Plan (Section VIII), and solid waste management (Section XIX). Therefore, potential impacts associated with wasteful energy use during construction or operation would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: Initial Study)

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?
(Less than Significant Impact)**

The Proposed Project would comply with the City of Lake Elsinore building code, which is consistent with the State of California Energy Commission 2016 Building Energy Efficient Standards⁵ for Non-Residential Buildings. The City of Lake Elsinore has adopted the City of Lake Elsinore Climate Action Plan (Climate Action Plan), on December 13, 2011. The Climate Action Plan provides specific measures to be implemented in new developments to reduce GHG emissions as well as a GHG emissions reduction target based on a community-wide emissions reduction to 6.6 MTCO₂e per service population per year by 2020. The Climate Action Plan also addresses measures that address renewable energy and energy efficiency (Project Design Features 1 through 6). Appendix A provides a list of the applicable reduction measures for new non-residential developments included in the Climate Action Plan and a project consistency analysis of each measure. With implementation of Project Design Features 1 through 6, the Proposed Project would be consistent with the applicable local measures provided in the Climate Action Plan. Therefore, potential impacts associated with obstructing a state or local plan for renewable energy or energy efficiency would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: Initial Study, General Plan)

VII. GEOLOGY AND SOILS.

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. (Less than Significant Impact)**

The City is located in the northern part of the Peninsular Ranges Province and includes parts of two structural blocks, or structural subdivisions of the province. The active Elsinore fault zone diagonally crosses the southwest corner of the Elsinore 7.5' quadrangle and is a major element of the right-lateral strike-slip San Andreas Fault system. The Elsinore Fault Zone forms a complex series of pull-apart basins.

According to the *Preliminary Geotechnical Interpretive Report* prepared for the Project by CW

⁵ <https://www.energy.ca.gov/title24/2016standards/>

Soils, dated February 27, 2019 (Appendix C), the subject property is not located within an Alquist-Priolo Fault Rupture Hazard Study Zone, established by the State of California to restrict the construction of habitable structures across identifiable traces of known active faults. No active faults with the potential for surface fault rupture are known to pass directly beneath the site. The nearest faults to the Project site are associated with the Elsinore Fault system located approximately 1.8 miles from the site. Thus, the potential for surface rupture due to faulting occurring beneath the site during the design life of the proposed development is considered low. Additionally, any structure developed as a part of the Project will be subject to seismic design criteria in accordance with the California Building Code (CBC) which will reduce potential impacts related to the rupture of an earthquake fault. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: Geotechnical Report – Appendix C)

ii) Strong seismic ground shaking? (Less than Significant Impact)

The site is situated in a seismically active area that has historically been affected by generally moderate to occasionally high levels of ground motion. The site lies in relative close proximity to several seismically active faults; therefore, during the life of the proposed improvements, the City and surroundings also have the potential to experience significant ground shaking as a result of seismic activity on a number of the Peninsular Ranges' other active faults as shown in Section 3.11 Geology & Soils of the Lake Elsinore General Plan EIR. The Proposed Project would be designed and constructed in accordance with seismic design requirements of the current California Building Code (CBC), which would address potential impacts related to potential ground shaking. Therefore, potential impacts associated with strong seismic ground shaking would be less than significant

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, Geotechnical Report – Appendix C)

iii) Seismic-related ground failure, including liquefaction? (Less than Significant Impact)

The geotechnical investigation for the Proposed Project evaluated the potential for seismic-related ground failure, including liquefaction, at the Project Site. The three requirements for liquefaction to occur include seismic shaking, poorly consolidated cohesionless sands, and groundwater. Liquefaction results in a substantial loss of shear strength in loose, saturated, cohesionless soils subjected to earthquake induced ground shaking. Potential impacts from liquefaction include loss of bearing capacity, liquefaction related settlement, lateral movements, and surface manifestation in the form of sand boils.

The *Preliminary Geotechnical Interpretive Report* prepared for the Project by CW Soils, dated February 27, 2019 (Appendix C) provided liquefaction analyses that model the existing ungraded

conditions and recommended graded conditions, using a groundwater level of 5 feet to represent a conservative historic high groundwater level. The analyses of the post-graded conditions revealed that potentially liquefiable soils were encountered in boring B-2, from 14 to 19 feet. The geotechnical report estimates that dynamic settlement of sands due to liquefaction will be approximately 1.7 inches near Boring B-2 prior to performing the recommended grading improvements. Upon completion of the recommended grading improvements, the report estimates that dynamic settlement of sands due to liquefaction will be approximately 0 inches near Boring B-2. Therefore, the potential for design level earthquake induced liquefaction and lateral spreading to occur beneath the proposed structures is considered very low to remote due to the recommended compacted fill and the dense nature of the deeper onsite soils. Prior to the issuance of a grading permit, the Property Owner/Developer of the Proposed Project would be required to submit grading and foundation plans to the City for review to demonstrate compliance with the City's grading requirements as well as any applicable recommendations contained in the geotechnical report. The Proposed Project would be designed and constructed in accordance with CBC requirements which would reduce risks associated with liquefaction. Therefore, potential impacts to people or structures from liquefaction shaking would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: Geotechnical Report – Appendix C)

iv) Landslides? (No Impact)

Landslides result from the downward movement of earth or rock materials that have been influenced by gravity. In general, landslides occur due to various factors including steep slope conditions, erosion, rainfall, groundwater, adverse geologic structure, and grading impacts. The Project Site is generally flat and is surrounded by similar topography and no significant slopes are proposed as part of the project design. The Project Site is in the Business District of the General Plan and its slope is less than 15%. Potential landslide impacts would be concentrated in districts with steep slopes of more than 30% and in Hillside Residential land use designations, including the Northwest Sphere, Lake View Sphere, Lakeland Village, Alberhill, North Central Sphere, Meadowbrook, Lake Elsinore Hills, and Riverview Districts of the General Plan. Therefore, no impacts associated with landslides would occur.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, Riverside County GIS)

b) Result in substantial soil erosion or the loss of topsoil? (Less than Significant Impact)

Construction activities have the potential to result in soil erosion or the loss of topsoil. However, erosion will be addressed through the implementation of existing State and Federal requirements, and minimized through compliance with the National Pollutant Discharge

Elimination System (NPDES) general construction permit which requires that a storm water pollution prevention plan (SWPPP) be prepared prior to construction activities and implemented during construction activities. The preparation of a Storm Water Pollution Prevention Plan (SWPPP) will identify Best Management Practices (BMPs) to address soil erosion. Upon compliance with these standard regulatory requirements, the proposed Project is not anticipated to result in substantial soil erosion or the loss of topsoil. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: PWQMP – Appendix F)

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? (Less than Significant Impact)

Seismically-induced lateral spreading involves primarily lateral movement of earth materials due to ground shaking. For lateral spreading to occur, the liquefiable zone must be continuous, unconstrained laterally, and free to move along gently sloping ground toward an unconfined area. Lateral spreading results in near-vertical cracks with predominantly horizontal movement of the soil mass involved. A gentle slope in the ground face or the presence of a slope face nearby can cause the ground to slide or spread on layers of liquefied soil. The Project Site is generally flat and there is no slope.

The Project Site is not located in an area of landslide potential. The geotechnical report recommends that prior to placing compacted fills, the exposed bottom should be scarified to a depth of 6 inches or more, watered or air dried as necessary to achieve near optimum moisture content and then compacted to a minimum of 90 percent. The Proposed Project would be constructed in compliance with the recommendations in the geotechnical report and the CBC. Therefore, potential impacts associated with unstable soil would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: Geotechnical Report – Appendix C)

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? (Less than Significant with Mitigation Incorporated)

While there is currently no soil mapping that identifies specific areas within the City that are subject to expansive soils, such soils are known to exist in the City. Expansive soils are composed of a significant amount of clay particles which can expand (absorb water) or contract (release water). These shrink and swell characteristics can result in structural stress and place other loads on these soils. According to the *Preliminary Geotechnical Interpretive Report prepared for the*

Project by CW Soils, the preliminary laboratory test results indicate that the onsite soils exhibit an expansion potential of Medium (Expansion Index of 51 to 90) as classified by the 2016 CBC. The CBC specifies that slab on grade foundations (floor slabs) resting on soils with expansion indices greater than 20, require special design considerations per the 2016 CBC. Accordingly, measures are considered necessary to reduce anticipated expansion and collapse potential. Implementation of mitigation measure **MM Geo 1**, requiring the proposed Project to comply with all recommendations contained in the *Geotechnical Report*, will reduce impacts related to expansive soil conditions to a less than significant level. The design procedures incorporate the thickness and plasticity index of the various soils within the upper 15 feet of the proposed structure.

Mitigation Measures:

MM Geo 1: *Compliance with Recommendations from the Geotechnical Interpretive Report.*

Per the Preliminary Foundation Design Recommendations section of the *Geotechnical Report*, the Project shall comply with the recommendations for: Conventional Footings, Building Floor Slabs, and Post Tensioned Slab/Foundation Design Recommendations as described below:

a. **Conventional Footings**

- Exterior continuous footings should be founded at the minimum depths below the lowest adjacent final grade (i.e. minimum 18 inch depth for one-story and two-story, and minimum 24 inch depth for three-story construction). Interior continuous footings for one-, two-, and three-story construction may be founded at a minimum depth of 12 inches below the lowest adjacent final grade. In accordance with Table 1809.7 of the 2016 CBC, all continuous footings should have a minimum width of 12, 15, and 18 inches, for one-, two-, and three-story structures, respectively, and should be reinforced with a minimum of four (4) No. 4 bars, two (2) top and two (2) bottom.
- Exterior pad footings intended to support roof overhangs, such as second story decks, patio covers and similar construction should be a minimum of 24 inches square and founded at a minimum depth of 18 inches below the lowest adjacent final grade. The pad footings should be reinforced with a minimum of No. 4 bars spaced a maximum of 18 inches on center, each way, and should be placed near the bottom-third of the footings.

b. **Building Floor Slabs**

- Building floor slabs should be a minimum of 4 inches thick. All floor slabs should be reinforced with a minimum of No. 3 bars spaced a maximum of 18 inches on center, each way, supported by concrete chairs or bricks to ensure desired mid-depth placement. Based on an assumed effective plasticity index of 16, the project architect or structural engineer should evaluate minimum floor slab thickness and reinforcement in accordance with 2016 CBC Section 1808.6.2.
- Building floor slabs with moisture sensitive or occupied areas, should be

underlain by a minimum 10-mil thick moisture barrier to help reduce the upward migration of moisture from the underlying soils. The moisture barrier should be properly installed using the guidelines of ACI publication 318-05 and meet the performance standards of ASTM E 1745 Class A material. Prior to placing concrete, it is the responsibility of the contractor to ensure that the moisture barrier is properly placed and free of openings, rips, or punctures. As an option for additional moisture protection and foundation strength, higher strength concrete, such as a minimum compressive strength of 5,000 pounds per square inch (psi) in 28-days may be used. In addition, a capillary break/vapor retarder for concrete slabs should be provided in accordance with CALGreen. Ultimately, the design of the moisture barrier system along with recommendations for concrete placement and curing are the purview of the foundation engineer, factoring in the project conditions provided by the architect and owner.

- Garage floor slabs should be a minimum of 5 inches thick and should be reinforced in a similar manner as living area floor slabs. Garage floor slabs should be placed separately from adjacent wall footings with a positive separation maintained with $\frac{3}{8}$ inch minimum felt expansion joint materials and quartered with weakened plane joints. A 12 inch wide turn down founded at the same depth as adjacent footings should be provided across garage entrances. The turn down should be reinforced with a minimum of two (2) No. 4 bars, one (1) top and one (1) bottom.
- Prior to placing concrete, the subgrade soils below all floor slabs should be pre-watered to achieve a moisture content at least 1.1 times optimum. The moisture content should penetrate a minimum depth of 12 inches into the subgrade soils. The pre-watering should be verified and tested by CW Soils.

c. **Post Tensioned Slab/Foundation Design Recommendations**

In lieu of the proceeding foundation recommendations, post tensioned slabs may be used for the proposed structures. Post tension foundations are generally considered to be a better foundation system, but may be slightly higher in overall cost. The foundation engineer may design the post tensioned foundation system using the following Post Tensioned Foundation Slab Design table. These parameters have been provided in general accordance with Post Tensioned Design. Alternate designs addressing the effects of expansive soils are allowed per 2016 CBC Section 1808.6.2. When utilizing these parameters, the foundation engineer should design the foundation system in accordance with the allowable deflection criteria of applicable codes.

It should be noted that the post tensioned design methodology is partially based on the assumption that soils moisture changes around and underneath post tensioned slabs, are only influenced by climate conditions. With regard to expansive soils, moisture variations below slabs are the major factor in foundation damage. However, the design methodology does not take into

account presaturation, owner irrigation, or other non-climate related influences on the moisture content of the subgrade soils. In recognition of these realities, we modified the soils parameters obtained from this methodology to help account for reasonable irrigation practices. Additionally, the slab subgrades should be presoaked to a depth of 12 inches and maintained at above optimum moisture until placing concrete. Furthermore, prior to placing concrete, the subgrade soils below all floor slabs and perimeter footings should be presoaked to achieve moisture contents at least 1.0, 1.1, 1.2, and 1.3 times optimum to depths of 6, 12, 18, and 24 inches for Low, Medium, High, and Very High expansion potential soils, respectively. The moisture content should penetrate to a minimum depth of 24 inches into the subgrade soils. The pre-watering should be verified and tested by CW Soils.

Ponding water near the foundation can significantly change the moisture content of the soils below the foundation, causing excessive foundation movement and detrimental effects. Our recommendations do not account for excessive irrigation and/or incorrect landscape designs. To prevent moisture infiltration below the foundation, planters placed adjacent to the foundation should be designed with an effective drainage system or liners. Some lifting of the perimeter foundation should be expected even with properly constructed planters.

Future owners should be informed and educated of the importance in maintaining a consistent level of moisture within the soils around structures. Potential negative consequences can result from either excessive watering or allowing expansive soils to become too dry. Expansive soils will shrink as they dry, followed by swelling during the rainy winter season or when irrigation is resumed, causing distress to site improvements.

(Sources: Geotechnical Report – Appendix C)

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (Less than Significant Impact)

The proposed Project will be served by a sewer system and no septic tanks or alternative wastewater disposal systems would be required. Existing septic systems and any septic systems discovered during the development of the proposed Project will be properly abandoned, closed, or destroyed in accordance with all applicable state and local regulations. Thus, the proposed Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. Therefore, impacts are less than significant

Mitigation Measures: No mitigation measures are required.

(Sources: Project Description)

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Less than Significant Impact)

According to the Riverside County GIS database, the proposed Project is located within a paleontological sensitivity area of low potential. Due to the previously developed and disturbed nature of the Project site, no paleontological resources or site or unique geologic features are anticipated to be impacted. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: Riverside County GIS)

VIII. GREENHOUSE GAS EMISSIONS

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Less than Significant Impact)

Construction activities associated with the Project would result in emissions of CO₂ and CH₄ from construction activities. For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions.

Operational activities associated with the proposed Project will result in emissions of CO₂, CH₄, and N₂O from the following primary sources: Area Source Emissions, Energy Source Emissions (combustion emissions associated with natural gas and electricity), Mobile Source Emissions, On-site Equipment Emissions, Water Supply, Treatment, and Distribution, and Solid Waste. The annual GHG emissions associated with the operation of the proposed Project are estimated to be 2,635.39 MTCO₂e per year as summarized in Table 6.

Table 6: Project GHG Emissions

Emission Source	Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ E
Annual construction-related emissions amortized over 30 years	17.27	0.00	0.00	17.35
Area Source	0.01	2.00E-05	0.00	0.01
Energy Source	460.08	0.02	0.01	462.10
Mobile (Passenger Car) Sources	674.56	0.01	0.00	674.89
Mobile (Truck) Sources	1,255.52	0.04	0.00	1,256.55
On-Site Equipment	50.84	0.02	0.00	51.25
Waste	22.94	1.36	0.00	56.83
Water Usage	94.13	0.69	0.17	116.41

Total CO₂E (All Sources)	2,635.39
Screening Threshold (CO₂e)	10,000
Threshold Exceeded?	NO

Source: CalEEMod™ model output, See Appendices 3.1 through 3.3 for detailed model outputs.

The SCAQMD’s adopted numerical threshold of 10,000 MTCO₂e per year for industrial stationary source emissions is selected as the significance criterion. The SCAQMD-adopted industrial threshold was selected by the City because the proposed Project is more analogous to an industrial use than any other land use such as commercial or residential in terms of its expected operating characteristics. The Project proposes a warehouse use that will serve mid- stream functions in the goods movement chain between manufacturers and consumers, characteristic of an industrial operation. Further, analysis of the Project’s traffic generation in this report is based on the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, 2017 for warehouse and industrial land use categories. Also, 10,000 MTCO₂e has been used as the significance threshold by many local government lead agencies for logistics projects throughout the SCAG region since the SCAQMD adopted this threshold for its own use. Further, to ensure that the threshold is conservative in its application, although the SCAQMD uses their adopted 10,000 MTCO₂e threshold to determine the significance of stationary source emissions for industrial projects, the 10,000 MTCO₂e threshold used in this CEQA document is applied to all sources of Project-related GHG emissions whether stationary source, mobile source, area source, or other.

Use of this threshold is also consistent with guidance provided in the CAPCOA *CEQA and Climate Change* handbook, as such, the City has opted to use a non-zero threshold approach based on Approach 2 of the handbook. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on capture of approximately 90 percent of emissions from future development. The latest threshold developed by SCAQMD using this method is 10,000 MTCO₂e based on the review of 711 CEQA projects.

As previously stated, the Project will result in approximately 2,635.39 MTCO₂e per year. As such, the Project would not exceed the SCAQMD’s numeric threshold of 10,000 MTCO₂e if it were applied. Thus, the Project would not have the potential to result in a cumulatively considerable impact with respect to GHG emissions. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: GHG Report – Appendix H)

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Less than Significant Impact)

The Proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. The City of Lake Elsinore has adopted the City of Lake Elsinore Climate Action Plan (CAP), on December 13, 2011. The CAP

provides specific measures to be implemented in new developments to reduce GHG emissions. Appendix G, Table 3-4 provides a list of the applicable reduction measures for new non-residential developments included in the Climate Action Plan and a project consistency analysis of each measure. With implementation of Project Design Features 1 through 8, the Proposed Project would be consistent with the applicable local measures provided in the CAP as well as the programs and standards that would be implemented as a result of the CAP. Section III(a) shows that the Proposed Project is consistent with the General Plan Update growth projections. The Proposed Project would comply with the CAP's local measures and reduction targets and would not conflict with the applicable plan for reducing GHG emissions. Therefore, potential impacts associated with conflict with a plan, policy, or regulation to reduce greenhouse gas emissions would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: GHG Report – Appendix H, CAP)

IX. HAZARDS AND HAZARDOUS MATERIALS

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Less than Significant Impact)

Construction of the proposed Project may include the transportation and storage of hazardous materials, such as fuels, cleaning solvents, or pesticides. The transportation of hazardous materials can result in accidental spills, leaks, toxic releases, fire, or explosion. The proposed Project is not expected to create the need for an excess of hazardous materials being used on-site during construction or operation.

A number of federal and state agencies prescribe strict regulations for the safe transportation of hazardous materials. Hazardous material transport, storage and response to upsets or accidents are primarily subject to federal regulation by the United States Department of Transportation (DOT) Office of Hazardous Materials Safety in accordance with Title 49 of the Code of Federal Regulations. California regulations applicable to Hazardous material transport, storage and response to upsets or accidents are codified in Title 13 (Motor Vehicles), Title 8 (Cal/OSHA), Title 22 (Management of Hazardous Waste), Title 26 (Toxics) of the California Code of Regulations, and the Chapter 6.95 of the Health and Safety Code (Hazardous Materials Release Response Plans and Inventory).

As the proposed Project will be required to comply with all applicable federal and state laws related to the transportation, use, storage and response to upsets or accidents that may involve hazardous materials would reduce the likelihood and severity of upsets and accidents during transit and storage, it is not expected to result in the use of large amounts of hazardous materials that would create a hazard to the public or environment. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: CCR; Code of Federal Regulations; Health and Safety Code)

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Less than Significant Impact)

As noted in response Item IX.a above, the proposed Project may involve the use of hazardous materials but shall comply with all applicable federal and state laws pertaining to the transport, use, disposal, handling, and storage of hazardous materials, including but not limited to Title 49 of the Code of Federal Regulations and Title 13, (motor vehicles) Title 8 (Cal/OSHA), Title 22 (Health and Safety Code), Title 26 (Toxics) of the California Code of Regulations, and Chapter 6.95 of the Health and Safety Code (Hazardous Materials Release Response Plans and Inventory), which describes strict regulations for the safe transportation and storage of hazardous materials. Thus, the proposed Project will be required to comply with all applicable federal and state laws related to the transportation, use and storage of hazardous materials and will not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: CCR; Code of Federal Regulations; Health and Safety Code)

c) Emit hazardous emissions or handle hazardous materials or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (Less than Significant Impact)

The closest school site is the Ortega High School, located directly south of the Project site. As previously discussed, the Proposed Project would be required to comply with all applicable federal, state and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste during the construction phase to reduce the likelihood and severity of accidents during transit. Proper handling of the use and disposal of hazardous materials would reduce the potential for exposure of any school in proximity to the Project Site to hazardous materials. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: CCR; Code of Federal Regulations; Health and Safety Code)

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

Based on the California Department of Toxic Substances Control, EnviroStor Site/Facility Search, the Project Site is not included on a list of hazardous materials sites pursuant to Government Code Section 65962.5. An *Environmental Site Assessment - Phase I* was prepared by California Environmental in July 2018 for the proposed Project site; a site visit was conducted on May 5, 2018. Historical site utilization research indicates the subject property was undeveloped from at least 1938 until 2005. Light agricultural use is evident on air photos in the 1940s and 1950s. From 2009 until 2010 the property was utilized as a contractor's storage yard. The property is currently vacant. A construction materials debris pile was observed in the south corner of the site. The pile contained concrete fragments, RCP sections, a concrete septic tank, red clay bricks, miscellaneous metal, concrete footings and small concrete slabs. Clay pot fragments, brick, small concrete pieces and asphalt grindings were spread over much of the surface of the site. No evidence of hazardous materials was observed in the construction debris observed at the site.

Screening soil sampling was conducted at the site to evaluate for TPH, metals, PCBs and organochlorine pesticides in shallow soil at the site. PCBs and pesticides were not detected. The low concentrations of TPH (40-92 mg/Kg) detected in soil are likely related to the asphalt debris observed in shallow soil and this is not an environmental concern. The concentrations of metals detected are within the ranges normally found in native soils except for an elevated concentration of lead (250 mg/Kg) detected in sample S2. The concentration of lead detected in sample S2 is below the CalEPA-DTSC screening level of 320 mg/Kg for commercial properties. The clay pot fragments containing glazing were tested for the presence of metals. No hazardous concentrations of metals were detected in the clay pot glazing.

The subject property is not identified on the standard environmental government sources researched in this report. The nearest listed environmental concern site is located at 653 West Minthorn Street, approximately 190 feet to the northeast. This offsite property was formerly occupied by Rightway Portable Toilets. A release from a gasoline UST impacted the soil at this offsite facility. This site was granted case closure from the Santa Ana RWQCB in 1989. Impact to the subject site from this offsite property is considered unlikely as the site was granted case closure by the Santa Ana RWQCB. No additional data regarding this offsite release was found. Therefore, potential impacts associated with hazardous materials sites would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: DTSC; Google Earth; Phase I ESA – Appendix D)

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 for people residing or working in the project area? (No Impact)

The Proposed Project is not be located within an airport land use plan or within two miles of a public airport or public use airport. Therefore, no impacts associated with safety hazards or

excessive noise in proximity to an airport would occur.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR)

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Less than Significant Impact)

The proposed Project will be required to comply with all 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. This review will ensure that the Project will provide adequate emergency access to and from the site. Further, the City Engineer and the City Fire Department will review any modifications to existing roadways to ensure that adequate emergency access and/or emergency response would be maintained. Thus, the proposed Project does not propose any changes that will impact the City's Emergency Preparedness Plan or the Riverside County Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan so will not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR)

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (Less than Significant Impact)

According to the Riverside County Fire Hazard Severity Zone Maps and the City of Lake Elsinore General Plan EIR Figure 3.10-2 (City of Lake Elsinore Wildfire Susceptibility), the Project Site is not located in a High or Very High Fire Hazard Severity Zone. The Project Site is vacant and bounded by commercial and industrial land uses to the north and west, Lake Elsinore Unified School District and Ortega High School to the south, and Government offices to the east. As part of the plan check process, the Project Site plan would undergo a fire, life, and safety review by the City Fire Department to determine the specific fire requirements applicable to ensure compliance with these requirements. Therefore, impacts associated with wildland fires would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: Riverside County Fire Hazard Severity Zone Maps, General Plan EIR Figure 3.10-2 - City of Lake Elsinore Wildfire Susceptibility)

X. HYDROLOGY AND WATER QUALITY

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? (Less than Significant Impact)

The Santa Ana Regional Water Quality Control Board (SARWQCB) sets water quality standards for all ground and surface waters within the Project's 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 (water quality objectives).

Construction of the Proposed Project would include grading, excavation, and other earthmoving activities that have the potential to cause erosion that could subsequently degrade water quality and/or violate water quality standards. As required by the Clean Water Act, the Proposed Project would comply with the Santa Ana Municipal Separate Storm Sewer (MS4) National Pollution Discharge Elimination System (NPDES) Permit. The NPDES MS4 Permit Program, which is administered in the project area by Riverside County and is issued by the Santa Ana Regional Water Quality Control Board (RWQCB), regulates storm water and urban runoff discharges from developments to natural and constructed storm drain systems in the City of Lake Elsinore. Since the Proposed 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 (SWRCB). 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.

Development of the Project Site would add impervious surfaces through associated parking lot and parking, sidewalks, and drive aisles. By increasing the percentage of impervious surfaces on the Project Site, less water would percolate into the ground and more surface runoff would be generated. Paved areas and streets would collect dust, soil and other impurities that would then be assimilated into surface runoff during rainfall events. Operation of the Proposed Project has the potential to release pollutants resulting from replacing vacant land with roadways, walkways, and parking lots. These improvements may potentially impact water quality. However, according to the *Project Specific Water Quality Management Plan* prepared by SB&O, Inc., dated May 17, 2019 (Appendix E), while the Project is approximately 80% impervious, the impervious area has been reduced to the minimum area possible. The pervious area will be vegetated landscape and one underground infiltration basin underneath the proposed parking areas. The Preliminary WQMP has been submitted to the City Public Works Department for review. Prior to issuance of a grading or building permit, a final WQMP will be required for the Project.

The proposed Project incorporates site design, source controls and treatment control BMPs to address storm water runoff. The building rooftops shall drain back to landscape areas, where

possible, for natural filtration. The catch basins will have filtration inserts to filter runoff prior to entering the proposed underground infiltration basin. Thus, through BMPs combined with compliance of existing regulations the proposed Project will not violate water quality standards or waste discharge requirements. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: PWQMP – Appendix F)

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge, such that the project may impede sustainable groundwater management of the basin? (Less than Significant Impact)

According to General Plan EIR, the proposed Project is located within the Elsinore Groundwater Management Zone (GMZ). Since the City has a large amount of vacant land, substantial changes to recharge systems could occur from development of the vacant parcels. In order to reduce pollutants, the City has implemented policies to minimize pollutants in the local and regional waterways, which includes water that percolates into the groundwater through Water Resources Policies 4.1, 4.2, and 4.3. Water Resources Policies 4.1 and 4.2 require development projects to acquire a National Pollutant Discharge Elimination System (NPDES) permit and implement Best Management Practices (BMPs) to reduce pollutants. Water Resources Policy 4.3 requires the City to review future development project's beneficial uses during the environmental review stage. Therefore, the proposed Project is not expected to substantially deplete groundwater supplies.

As outlined in the *Project Specific Water Quality Management Plan* prepared by SB&O, Inc., the proposed Project utilizes the minimum impervious area possible. The pervious area will be vegetated landscape and one underground infiltration basin underneath the proposed parking areas. The proposed Project incorporates site design, source controls and treatment control BMPs to address storm water runoff. Where possible, the building rooftops shall drain back to landscape areas for natural filtration. The catch basins will have filtration inserts to filter runoff prior to entering the proposed underground infiltration basins. These conditions are not conducive to groundwater recharge. Thus, development of the Project site will not substantially interfere with groundwater recharge. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR; PWQMP – Appendix F)

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 substantial erosion or siltation on- or off-site? (Less than Significant Impact)

According to the *Preliminary Drainage Report* prepared by SB&O, Inc., dated May 17, 2019 (Appendix D), approximately 43% of the existing site drains south and discharges from the site into a concrete inlet on the adjoining County social services property. The remainder of the project site discharges into Chaney Street all along the northwest property line. Development of the Project site for industrial use will include associated parking, landscape areas, and drive aisles. The existing inlet will be blocked off at the property line and all proposed site flows will discharge to Chaney Street and ultimately into Temescal Creek.

The Project is subject to NPDES requirements including preparing and implementing a SWPPP for the prevention of runoff during construction. Erosion, siltation and other possible pollutants associated with long-term implementation of the Project is addressed as part of the project-specific Preliminary WQMP and grading permit process. Thus, through compliance with existing regulations and policies the proposed Project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. Therefore, impacts will be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: Hydro; PWQMP – Appendix F)

ii). Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (Less than Significant Impact)

As described in Item X.c.ii. above, the Proposed Project would not substantially alter the existing drainage pattern of the Project Site. The drainage area will have an increased impervious area from existing conditions and will result in slightly higher peak runoff values. The increase in peak runoff shall be mitigated to a level at or below existing levels through the use of underground infiltration basins, catch basins, and outlet structures as outlined in the *Preliminary Drainage Report* prepared by SB&O, Inc. The catch basin can store the anticipated volume from a 100-year, 24-hour storm event. The catch basin will also have sufficient capacity to alleviate the expected increase in runoff, retaining the peak flow within the private street and eliminating offsite flow to Lakeshore Drive. Thus, no flooding on or off-site as a result of the proposed Project will occur. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: Hydro; PWQMP – Appendix F)

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; (Less than Significant Impact)

The proposed underground infiltration basins would retain and treat runoff from the Project Site.

Non-structural BMPs such as activity restrictions, basin inspection, street sweeping, and common area landscape maintenance and litter control would also contribute towards runoff control and water quality protection. In addition, the Proposed Project would be required to comply with the NPDES permit requirements to reduce any potential water quality impacts. The Proposed Project would not create or contribute runoff water that would exceed the capacity of the drainage systems or provide additional sources of polluted runoff.

The amount of water runoff is not expected to exceed stormwater drainage capacity. The Property Owner/Developer shall prepare a SWPPP for construction activity associated with the Proposed Project. The SWPPP shall be maintained at the construction site for the entire duration of construction. The objectives of the SWPPP are to identify pollutant sources that may affect the quality of storm water discharge and to implement BMPs to reduce pollutants in storm water discharges during construction and post construction in compliance with NPDES. Projects that comply with NPDES standards would result in a less than significant impact. In addition, storm drains located within the City limits are maintained by the City as well as by the Riverside County Flood Control and Water Conservation District. Storm runoff within the City is generally intercepted by a network of City facilities and then conveyed into regional facilities. All downstream conveyance channels that would receive runoff from the Project Site are engineered and regularly maintained to ensure flow capacity. Therefore, potential impacts associated with runoff would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, PWQMP – Appendix F)

iv) Impede or redirect flood flows? (Less than Significant Impact)

According to the Federal Emergency Management Agency (FEMA), the majority of the proposed Project site is within Zone X (containing a small portion along the proposed Project site's western property line within the 0.2% annual chance of flood hazard zone) and is not within a 100-year flood hazard area. The Proposed Project has been designed to include drainage basins that would reduce post-development runoff rates in accordance with the requirements of the City of Lake Elsinore and Riverside County Flood Control and Water Conservation District. Because the Proposed Project has been designed to attenuate post-development runoff from the site, Project-related runoff would not substantially increase the rate or amount of surface runoff in downstream areas in a manner that would result in flooding on- or off-site. Additionally, the Proposed Project would not impede or redirect flood flows. Therefore, potential impacts associated with flood flows would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: FEMA, PWQMP – Appendix F)

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

inundation? (Less than Significant Impact)

According to the Federal Emergency Management Agency (FEMA), the majority of the proposed Project site is within Zone X (containing a small portion along the proposed Project site's western property line within the 0.2% annual chance of flood hazard zone) and is not within a 100-year flood hazard area. According to the *Preliminary Geotechnical Interpretive Report prepared for the Project by CW Soils*, the proposed Project site is not located within a coastal area. Therefore, tsunamis (seismic sea waves) are not considered to be a significant hazard at the site.

Seiches are large waves generated in enclosed bodies of water in response to ground shaking. The Project Site is surrounded by a relatively flat and urbanized area. The Project Site is located approximately 0.9 miles northeast of Lake Elsinore, which lacks significant potential for a damaging seiche because of its low depth, and presence of flood control devices constructed by the U.S. Army Corps of Engineers, including the berm fill at the southern end of the lake. The Project Site is located at least 25 miles from the ocean and approximately 1,267 feet above mean sea level (MSL). Due to the location of the Project Site, and topography of the surrounding locale, it is also not likely that mudflows would inundate the site. Therefore, no impacts associated with inundation by flood, tsunami, or seiche would occur.

Mitigation Measures: No mitigation measures are required.

(Sources: FEMA, General Plan EIR, Geotechnical Report – Appendix C)

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (Less than Significant Impact)

The Project Site is located within the Santa Ana River watershed, which is regulated by the Santa Ana Regional Water Quality Control Board (RWQCB). The RWQCB has developed a "Water Quality Control Plan" for the Santa Ana River Basin (herein, "Basin Plan"). The Basin Plan establishes water quality standards for the ground and surface waters of the region. The Basin Plan includes an implementation plan describing the actions by the RWQCB and others that are necessary to achieve and maintain the water quality standards. The RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's ground and surface water. Permits are issued under several programs and authorities. The terms and conditions of these discharge permits are enforced through a variety of technical, administrative, and legal means. The RWQCB ensures compliance with the Basin Plan through its issuance of National Pollutant Discharge Elimination System (NPDES) Permits, issuance of Waste Discharge Requirements (WDR), and Water Quality Certifications pursuant to Section 401 of the Clean Water Act (CWA). In conformance with these requirements, the Applicant has prepared a Water Quality Management Plan (WQMP), included as *Appendix E*, which demonstrates that the Proposed Project's drainage plan would meet all applicable requirements of the Basin Plan, including requirements and conditions of approval associated with NPDES permits, issuance of WDRs, and Water Quality Certifications. Therefore, the Proposed Project would not conflict with the Basin Plan, and potential impacts associated with implementation of a water quality control plan would

be less than significant.

According to General Plan EIR, the Project Site is located within the Elsinore Groundwater Management Zone (GMZ). Since the City has a large amount of vacant land, substantial changes to recharge systems could occur from development of the vacant parcels. In order to reduce pollutants, the City has implemented policies to minimize pollutants in the local and regional waterways, which includes water that percolates into the groundwater through Water Resources Policies 4.1, 4.2, and 4.3. Water Resources Policies 4.1 and 4.2 require development projects to acquire a National Pollutant Discharge Elimination System (NPDES) permit and implement Best Management Practices (BMPs) to reduce pollutants. Water Resources Policy 4.3 requires the City to review future development project's beneficial uses during the environmental review stage. Therefore, the Proposed Project would not conflict with any sustainable groundwater management plans, and potential impacts associated with implementation of a groundwater management plan would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, PWQMP – Appendix F)

XI. LAND USE AND PLANNING

a) Physically divide an established community? (No Impact)

The Project Site is currently zoned Limited Manufacturing (M-1) and is surrounded by Limited Manufacturing (M-1), Commercial Manufacturing (C-M), and Public/Institutional (PI) zoning designations. The Zoning Code divides the City into districts, or zones, and regulated land use activity in each district, specifying the permitted uses of land and buildings, density, bulk, and other regulations. The Proposed Project would construct an industrial business on an undeveloped parcel surrounded by other commercial and industrial development. The Project Site does not contain any existing residential or community structures and is in the Business District. The Proposed Project would not include any changes to the existing circulation network that would divide an existing community. Therefore, no impacts associated with the division of an established community would occur.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, Zoning Map)

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? (No Impact)

The General Plan Land Use Designation of the Project Site is Limited Industrial (LI) and it is zoned Limited Manufacturing (M-1). The LI designation provides for industrial parks, warehouses,

manufacturing, research and development, public and quasi-public uses, and similar and compatible uses. The Proposed Project, which includes the construction of three (3) buildings for warehousing and manufacturing, is consistent and compatible the LI Land Use Designation. The proposed warehousing and manufacturing use is a permitted use in the (M-1) Zone. The Proposed Project is consistent with all applicable existing and planned land use policies and regulations of the Lake Elsinore Municipal Code and the General Plan. The Project will not conflict with any applicable land use plan, policy, or regulation. Therefore, no impacts are anticipated

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, General Plan Land Use Map, Zoning Map)

XII. MINERAL RESOURCES

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (Less than Significant Impact)

The County's principal mineral resources include clay, limestone, iron ore, sand, and construction aggregate. As of 2010, six mines were active in the Lake Elsinore area, producing clay, stone/rock, and sand and gravel. Decomposed granite has also been mined in the Lake Elsinore area in recent years. According to Figure 3.12-1 of the General Plan EIR, the proposed Project site is located within the Mineral Resource Zone 3 Area (MRZ-3), or areas containing mineral deposits, the significance of which cannot be evaluated from available data. Historical site utilization research indicates the subject property was undeveloped from at least 1938 until 2005. Light agricultural use is evident on air photos in the 1940s and 1950s. From 2009 until 2010, the property was utilized as a contractor's storage yard. The property is currently vacant. No mineral extraction has been documented on the site. Given the size and location of the Project site in relationship to surrounding urban uses, it is highly unlikely that any surface mining or mineral recovery operation could feasibly take place in the Project area.

Additionally, the City's General Plan delineates mining operations areas by an overlay land use for mining purposes. The proposed Project is not within the Extractive Overlay of the General Plan Land Use Map. Therefore, the proposed Project will have less than significant impacts in regards to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR; General Plan LU Map)

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (No Impact)

As discussed in Item XII.a above, the City's General Plan delineates mining operations areas by

an overlay land use for mining purposes. The proposed Project is not within the Extractive Overlay of the General Plan Land Use Map. Thus, the proposed Project will not 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. Therefore, no impacts are anticipated.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR; General Plan LU Map)

XIII. NOISE

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 other applicable standards of other agencies? (Less than Significant Impact with Mitigation Incorporated)

A *Noise Impact Analysis*, prepared by Urban Crossroads dated July 23, 2019 (Appendix G) was completed to determine potential impacts to noise associated with the development of the Proposed Project. The following section calculates the potential noise emissions associated with the construction and operations of the Proposed Project and compares the noise levels to the City standards.

Operational Impacts

The operation of the Proposed Project may generate noise levels that exceed City standards at the existing nearby sensitive receptors. The operation of the Proposed Project may create an increase in noise levels from roof-top air conditioning units, idling trucks, delivery truck activities, backup alarms, as well as loading and unloading of dry goods, and parking lot vehicle movements all operating simultaneously.

To demonstrate compliance with local noise regulations, the Project-only operational noise levels were evaluated against exterior noise level thresholds of the City of Lake Elsinore. Table 7 shows the operational noise levels associated with the Pennington Industrial Project will satisfy the daytime and nighttime exterior noise level standards at the nearby receiver locations. All other receiver locations are shown to experience operational noise levels below the exterior noise level standards. Therefore, the project impact from operational noise will be *less than significant*.

Table 7: Unmitigated Operational Noise Level Compliance

Receiver Location ¹	Land Use	Noise Level at Receiver Locations (dBA) ²					Threshold Exceeded? ³
		L ₅₀ (30 mins)	L ₂₅ (15 mins)	L ₈ (5 mins)	L ₂ (1 min)	L _{max} (<1 min)	
Daytime	Residential Standards	50	60	65	70	75	-
Nighttime		40	55	60	65	70	-
Daytime		60	65	70	75	80	-

Nighttime	Public Space	55	60	65	70	75	-
R1	Residential	28.0	29.7	31.4	32.5	35.9	No
R2	Public	47.5	50.3	54.7	58.5	63.9	No
R3	Public	41.4	43.2	45.1	46.6	49.7	No

¹ See Exhibit 7-A for the receiver and noise source locations.

² Estimated unmitigated Project operational noise levels as shown on Table 7-2.

³ Do the estimated Project operational noise levels meet the operational noise level standards (Table 3-1)?

Construction Impacts

Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. The number and mix of construction equipment is expected to occur during site preparation, grading, building construction, paving, and architectural coating.

The construction noise analysis shows that the highest construction noise levels will occur when construction activities take place at the closest point from primary Project construction activity to each of the nearby receiver locations. As shown on Table 8, the unmitigated construction noise levels are expected to range from 38.7 to 72.9 dBA Leq at the receiver locations. To evaluate whether the Project will generate potentially significant short-term noise levels at off-site sensitive receiver locations the City of Lake Elsinore stationary construction equipment noise level standards of 60 dBA Leq for residential and 70 dBA Leq for public (e.g., school) uses, are used as the acceptable construction noise thresholds at the nearby sensitive receiver locations since Project construction will occur for greater than 10 consecutive days.

Table 8: Unmitigated Construction Equipment Noise Level Summary

Receiver Location ¹	Construction Stage Hourly Noise Level (dBA Leq)					Highest Noise Levels ²
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	
R1	38.7	48.0	42.7	40.4	42.0	48.0
R2	63.6	72.9	67.6	65.3	66.9	72.9
R3	63.6	72.9	67.6	65.3	66.9	72.9

¹ Noise receiver locations are shown on Exhibit 8-A.

² Estimated construction noise levels during peak operating conditions.

Table 9 shows the highest construction noise levels at the potentially impacted receiver locations are expected to approach 72.9 dBA Leq at receiver locations R2 and R3, and therefore, will potentially exceed the 70 dBA Leq threshold at occupied school uses represented by R2 and R3. The noise impact due to unmitigated Project construction noise levels is, therefore, considered a *potentially significant* impact at receiver locations R2 and R3. This *potentially significant* impact is due to large, or heavy, mobile equipment associated with the grading stage of Project construction.

Table 9: Unmitigated Construction Equipment Noise Level Compliance

Receiver Location ¹	Land Use Category	Highest Construction Activity Noise Levels (dBA L _{eq}) ²	Threshold (dBA L _{eq}) ³	Threshold Exceeded? ⁴
R1	Residential	48.0	60	No
R2	School	72.9	70	Yes
R3	School	72.9	70	Yes

¹ Noise receiver locations are shown on Exhibit 8-A.

² Estimated construction noise levels during peak operating conditions, as shown on Tables 8-7.

³ Construction noise level thresholds by land use category.

⁴ Do the estimated Project construction noise levels meet the construction noise level thresholds?

MM NOI 1 would require a minimum 90-foot buffer for large mobile equipment (greater than 80,000 pounds), loaded trucks, and jackhammers is required to reduce the Project construction noise level impacts at R2 and R3 (southwest property line). Table 10 shows the mitigated Project construction noise levels due to grading, with the 90-foot buffer, would result in noise levels approaching 63.4 dBA Leq at receiver locations R2 and R3, which are below the 70 dBA Leq exterior noise level threshold at public land uses, and as such, would result in less than significant noise impacts with mitigation.

Table 10: Mitigated Grading Equipment Noise Levels

Reference Construction Activity ¹	Reference Noise Level @ 50 Feet (dBA Leq)
Truck Pass-Bys & Dozer Activity	59.2
Dozer Activity	64.2
Rough Grading Activities	73.5
Highest Reference Noise Level at 50 Feet:	73.5

Receiver Location	Distance to Construction Activity (Feet) ²	Distance Attenuation (dBA) ³	Estimated Noise Barrier Attenuation (dBA) ⁴	Construction Noise Level (dBA Leq)
R1	943'	-25.5	0.0	48.0
R2	90'	-5.1	-5.0	63.4
R3	90'	-5.1	-5.0	63.4

¹ Reference construction noise level measurements taken by Urban Crossroads, Inc.

² Distance from the nearest point of construction activity to the nearest receiver with the minimum 90-foot buffer zone for large mobile equipment (> 80,000 lbs).

³ Point (stationary) source drop off rate of 6.0 dBA per doubling of distance.

⁴ Estimated barrier attenuation from existing barriers in the Project study area.

Mitigation Measures:

MM NOI 1: Construction Buffer. Prior to issuance of grading permits, the Property Owner/Developer shall include a note on the grading and building plans that no large mobile equipment (greater than 80,000 pounds), loaded trucks, and jackhammers shall be operated within 90 feet of the southwest property line.

(Sources: Noise Impact Analysis – Appendix G, LEMC)

b) Generation of excessive groundborne vibration or groundborne noise levels? (Less than Significant Impact with Mitigation Incorporated)

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. It is expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. The proposed Project’s construction activities most likely to cause vibration impacts are:

- Heavy Construction Equipment: Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.
- Trucks: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Based on the reference vibration levels provided by the Federal Transit Administration (FTA), Project-related construction vibration velocity levels are expected to approach 0.048 in/sec root-mean-square (RMS) at the nearby receiver locations at distances ranging from 30 to 943 feet, as shown on Table 11. Based on the City of Lake Elsinore vibration threshold of 0.01 in/sec RMS, the construction-related vibration impacts are considered *potentially significant* impact at receiver locations R2 and R3.

Table 11: Unmitigated Construction Equipment Vibration Levels

Receiver Location ¹	Distance to Const. Activity (Feet)	Receiver PPV Levels (in/sec) ²					RMS Velocity Levels (in/sec) ³	Threshold (RMS)	Threshold Exceeded? ⁴
		Small Bulldozer (<80k lbs)	Jack-hammer	Loaded Trucks	Large Bulldozer (>80k lbs)	Peak Vibration (PPV)			
R1	943'	0.000	0.000	0.000	0.000	0.000	0.000	0.01	No
R2	30'	0.002	0.027	0.058	0.068	0.068	0.048	0.01	Yes
R3	30'	0.002	0.027	0.058	0.068	0.068	0.048	0.01	Yes

¹ Receiver locations are shown on Exhibit 8-A of the NIA.

² Based on the Vibration Source Levels of Construction Equipment included on Table 8-10 of NIA.

³ Vibration levels in PPV are converted to RMS velocity using a 0.71 conversion factor identified in the Caltrans Transportation and Construction Vibration Guidance Manual, September 2013.

⁴ Does the peak vibration exceed the maximum acceptable vibration threshold shown on Table 3-4 of the NIA?

MM NOI 1 would require a minimum 90-foot buffer for large mobile equipment (greater than 80,000 pounds), loaded trucks, and jackhammers is required to reduce the Project construction noise level impacts at R2 and R3 (southwest property line). With the mitigation measures identified herein, the vibration levels would be reduced to 0.009 in/sec RMS at receiver locations R2 and R3, as shown on Table 12, and the impact due to Project construction would be considered a *less than significant* impact with mitigation for the adjacent receiver locations (R2 and R3) which represent the Keith McCarthy Academy and school use.

Table 12: Mitigated Construction Equipment Vibration Levels

Receiver Location ¹	Buffer Distance to Const. Activity (Feet)	Mitigated Receiver PPV Levels (in/sec) ²					RMS Velocity Levels (in/sec) ³	Threshold (RMS)	Threshold Exceeded? ⁴
		Small Bulldozer (<80k lbs)	Jack-hammer	Loaded Trucks	Large Bulldozer (>80k lbs)	Peak Vibration (PPV)			
R2	90'	-	0.005	0.011	0.013	0.013	0.009	0.01	No
R3	90'	-	0.005	0.011	0.013	0.013	0.009	0.01	No.

¹ Receiver locations are shown on Exhibit 8-A of the NIA.

² Based on the Vibration Source Levels of Construction Equipment included on Table 8-10 of NIA.

³ Vibration levels in PPV are converted to RMS velocity using a 0.71 conversion factor identified in the Caltrans Transportation and Construction Vibration Guidance Manual, September 2013.

⁴ Does the peak vibration exceed the maximum acceptable vibration threshold shown on Table 3-4 of the NIA?

Mitigation Measures: MM NOI 1, as defined in Item XIII.a, above.

(Sources: Noise Impact Analysis – Appendix G)

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? (No Impact)

The Proposed Project is not be located within an airport land use plan or within two miles of a public airport or public use airport. Therefore, no impacts associated with excessive noise in proximity to an airport would occur.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan)

XIV. POPULATION AND HOUSING

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (No Impact)

The Proposed Project consists of construct three (3) industrial buildings that are 91,140 square foot (SF) in total, which may directly induce growth through the addition of new businesses. The population is expected to increase from approximately 38,185 in the City in 2005 to 318,856 in the City and its sphere of influence in 2030. Residents who work within Lake Elsinore are primarily employed in services positions, manufacturing businesses, construction, and retail trade. The Proposed Project would provide employment opportunities for City residents. The Proposed Project would be consistent with the Limited Industrial land use designation contained in the City’s General Plan which provides for an estimated 16,424,826 square feet of industrial uses. The Proposed Project comprises approximately 0.6 percent of the City’s planned industrial uses.

The Proposed Project would be also considered infill development and is consistent with surrounding uses. Therefore, no impacts associated with unplanned population growth would occur.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan Land Use Map, General Plan EIR, Project Description)

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (No Impact)

The Project Site is currently vacant and would be developed with three (3) buildings intended for industrial use. In addition, the Proposed Project is zoned Limited Manufacturing (M-1) and has a general plan land use designation of Limited Industrial (L-I) and not intended for residential use. Therefore, the development of an industrial use on-site would not result in the displacement of substantial numbers of existing people or housing, which could necessitate the construction of replacement housing elsewhere. Therefore, no impacts associated with the displacement of substantial numbers of people or housing would occur.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan Land Use Map, Zoning Map, Project Description)

XV. PUBLIC SERVICES

Would the project 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 of the public services:

a) Fire protection? (Less than Significant Impact)

The City contracts for fire services from the Riverside County Fire Department and the California Department of Forestry and Fire Protection (CalFire). The nearest fire station is Station #97, located approximately 1.4 miles northeast of the Project Site as shown on Figure 3.14-1 of the General Plan EIR. The fire department currently serves the exiting parcel and the proposed land is consistent with the General Plan. Therefore, the construction of the Proposed Project would not represent a significant increase fire service.

Chapter 16.74 of the City of Lake Elsinore Municipal Code establishes a program for the adoption and administration of development impact fees by the City for the benefit of the citizens whereby as a condition to the issuance of a building permit or certificate of occupancy by the City the Property Owner/Developer would be 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 would 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. Since the Proposed Project does not propose new housing, any impacts would be considered incremental and can be offset through the payment of the appropriate development impact fees. The Proposed Project would also be required to comply with all applicable fire code requirements for construction and access to the site and as such, would be reviewed by the City Fire Department to determine the specific fire requirements applicable to ensure compliance with these requirements. The Proposed Project would not result in substantial adverse physical impacts related to fire protection. Therefore, potential impacts associated with fire protection would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR Figure 3.14-1 Police and Fire Stations, LEMC)

b) Police protection? (Less than Significant Impact)

Police protection services are provided by the Lake Elsinore Police Department (LEPD) under contract by the Riverside County Sheriff's Department (RCSD). The Lake Elsinore Police Department/Sheriff's Station is located at 333 Limited Avenue, approximately 1.08 miles southeast of the Project Site. Chapter 16.74 of the City's Municipal Code 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 Proposed Project would participate in this development impact fee program to mitigate impacts to police protection resources. Any potential impacts would be considered incremental and can be offset through the payment of the development impact fee. The Proposed Project would not result in substantial adverse physical impacts related to police protection. Therefore, potential impacts associated with police projection would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR Figure 3.14-1 Police and Fire Stations, LEMC)

c) Schools? (Less than Significant Impact)

The Project Site is located within the Lake Elsinore Unified School District (LEUSD) which serves most of the City of Lake Elsinore, all of the cities of Canyon Lake and Wildomar, and a portion of unincorporated Riverside County as shown in Figure 3.14-3 of the General Plan EIR. The Property Owner/Developer would be required to pay school impact fees as levied by the LEUSD, which would provide funding for school facilities. Since the Proposed Project does not propose new housing, any potential impacts would be considered incremental and can be offset through the payment of the appropriate development impact fees. The Proposed Project would not result in

substantial adverse physical impacts related to schools. Therefore, potential impacts associated with schools would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR Figure 3.14-3 – Schools and District Boundaries)

d) Parks? (Less than Significant Impact)

Since the Proposed Project does not propose residential uses, a direct increase in park uses is not expected as a result of Project implementation. Indirect impacts to park facilities from commercial development would be the occasional use of a park during a lunch or dinner break.

Section 16.34.060 in Chapter 16.34 (Required Improvements) for the City's Municipal Code requires that prior to the issuance of a building permit, the Property Owner/Developer pay fees for the purposes set forth in that section. Paragraph D of Section 16.34.060 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/Developer pay a fee for the purpose of purchasing the land and developing and maintaining the City park system.

As is consistent with all commercial projects, the Property Owner/Developer would be required to pay park fees to the City for the purpose of establishing, improving and maintaining park land within the City. Since the Proposed Project does not propose new housing, any potential impacts would be considered incremental and can be offset through the payment of the appropriate park fees. The Proposed Project would not result in substantial adverse physical impacts related to parks. Therefore, potential impacts associated with parks would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, LEMC)

e) Other public services/facilities? (Less than Significant Impact)

The City of Lake Elsinore is part of the Riverside County Library System. The nearest City of Lake Elsinore library to the Project Site is the Lake Elsinore Branch Library at 600 West Graham Avenue, approximately 0.9 miles southeast of the Project Site. Section 16.34.060 in Chapter 16.34 (Required Improvements) of the City's Municipal Code requires that prior to the issuance of a building permit, the Property Owner/Developer pay fees for the purposes set forth in that section. Paragraph B of Section 16.34.060 describes the City's Library Mitigation Fee and states that an in-lieu fee for future construction of library improvements shall be paid to the City to assure the necessary library facilities are provided the community. Since the Proposed Project does not propose new housing, any impacts would be considered incremental and can be offset through the payment of the appropriate library mitigation fees. Therefore, potential impacts associated with libraries would be less than significant.

Chapter 16.74 of the City's Municipal Code 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/Developer 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.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, LEMC)

XVI. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (Less than Significant Impact)

The City of Lake Elsinore Parks and Recreation Master Plan 2008 – 2030 establishes a goal of providing five acres of park space per 1,000 residents. The Proposed Project does not include elements (e.g., residential development) that would result in substantial increased demands for neighborhood or regional parks or other recreational facilities. Indirect impacts to park facilities from commercial development would be the occasional use of a park during a lunch or dinner break. As shown on Figure 3.15-1 – Parks of the General Plan EIR, there are no parks located within a half mile of the Project Site. Therefore, it is unlikely that the Proposed Project would increase the use of existing parks. As described in Section XIV(d), the Property Owner/Developer would be required to pay park fees to the City for the purpose of establishing, improving and maintaining parkland within the City. Since the Proposed Project does not propose new housing, any impacts would be considered incremental and can be offset through the payment of the appropriate park fees. The Proposed Project would not 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. Therefore, potential impacts associated with parks or recreational facilities would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR Figure 3.15-1 - Parks)

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? (No Impact)

The Proposed Project involves the construct three (3) industrial buildings that are 91,140 square foot (SF) in total. The Property Owner/Developer would be required to pay park fees to the City for the purpose of establishing, improving and maintaining park land within the City. The Proposed Project does not include recreational facilities and does not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, no impacts associated with recreational facilities would occur.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, Project Description)

XVII. TRANSPORTATION

A Traffic Impact Analysis was completed to determine potential impacts to traffic associated with the development of the Proposed Project (Appendix I - *Focused Traffic Evaluation, Pennington Industrial Project, City of Lake Elsinore, prepared by Urban Crossroads, dated July 29, 2019*).

On December 28, 2018, updates to the CEQA Guidelines were approved by the Office of Administrative Law (OAL). As part of the updates to the CEQA Guidelines, thresholds of significance for evaluation of impacts to transportation have changed. The CEQA Guidelines update eliminated the threshold of significance for evaluating impacts due to changes to air traffic patterns and consolidated the evaluation of impacts due to a conflict with adopted policies, plans, or programs into an analysis of impacts due to a conflict with programs, plans, ordinances, or policies addressing the circulation system (i.e., new Threshold a.). However, new Threshold b. of the CEQA Guidelines for Transportation and Traffic requires an evaluation of impacts due to Vehicle Miles Travelled (VMTs), instead of evaluating impacts based on Level of Service (LOS) criteria, as required by California Senate Bill (SB) 743. LOS has been used as the basis for determining the significance of traffic impacts as standard practice in CEQA documents for decades. In 2013, SB 743 was passed, which is intended to balance the need for LOS for traffic planning with the need to build infill housing and mixed-use commercial developments within walking distance of mass transit facilities, downtowns, and town centers and to provide greater flexibility to local governments to balance these sometimes-competing needs. At full implementation of SB 743, the California Governor's Office of Planning and Research (OPR) is expected to replace LOS as the metric against which traffic impacts are evaluated, with a metric based on VMTs. As a component of OPR's revisions to the CEQA Guidelines in December 2018, lead agencies will be required to adopt VMT thresholds of significance by July 2020. At the time this Initial Study/MND was prepared, a VMT metric was not published by OPR, and the City of Lake Elsinore in its capacity as Lead Agency, as well as surrounding local agencies in which the Proposed Project's traffic would circulate, use LOS as the significance criteria for evaluating a project's traffic impacts. For this reason, a LOS metric and not a VMT metric is appropriately used in this Initial Study/MND.

a) Conflict with a program plan, ordinance or policy addressing the circulation system,

including transit, roadway, bicycle and pedestrian facilities? (Less than Significant with Mitigation Incorporated)

A *Focused Traffic Evaluation* dated July 29, 2019 was prepared for the Project by Urban Crossroads to evaluate the proposed Project’s impacts on traffic. The trips generated by the Project have been estimated based on trip generation rates from the Institute of Transportation Engineers (ITE) publication *Trip Generation* (10th Edition, 2017). The trip generation rates used to estimate the proposed Project traffic are shown in Table 13. Table 13 also shows the Project trip generation, which consist of 71 trips in the AM peak hour, 78 trips in the PM peak hour, and 455 daily trips (passenger car equivalents).

Table 13: Project Trip Generation Summary (06/17/2019)

Trip Generation Rates ¹									
Land Use	ITE LU Code	Quantity ²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Manufacturing	140	91.14 TSF	0.48	0.14	0.62	0.21	0.46	0.67	3.93
80.3% Passenger Cars			0.39	0.11	0.50	0.17	0.37	0.54	3.16
5.2% 2-Axle Trucks (PCE = 1.5)			0.04	0.01	0.05	0.02	0.04	0.05	0.31
4.5% 3-Axle Trucks (PCE = 2.0)			0.04	0.01	0.06	0.02	0.04	0.06	0.35
10.0% 4-Axle+ Trucks (PCE = 3.0)			0.14	0.04	0.19	0.06	0.14	0.20	1.18

Trip Generation Results									
Land Use	ITE LU Code	Quantity ²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Manufacturing	140	91.14 TSF							
Passenger Cars:			35	10	45	15	34	49	288
Truck Trips:			3	1	4	1	3	4	28
2-Axle Trucks			4	1	5	2	4	6	32
3-Axle Trucks			13	4	17	6	13	19	107
4-Axle Trucks									
TOTAL			55	16	71	24	54	78	455

¹ Trip Generation Source: Institute of Transportation Engineers (ITE), *Trip Generation Manual*, 10th Edition (2017).

² TSF = Thousand Square Feet

³ Vehicle Mix Source: City of Fontana Truck Trip Generation Study for LU 150 (Light Warehouse), August 2003. PCE rates are per SANBAG.

Project Trip Distribution

Trip distribution is the process of identifying the probable destinations, directions or traffic routes that will be utilized by Project traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered, to identify the route where the Project traffic would distribute. The Project trip distribution was developed based on anticipated travel patterns to and from the Project site. The trip distribution pattern is heavily influenced by the geographical location of the site, the location of surrounding uses, and the proximity to the regional freeway system. Appendix H, Exhibit 3 illustrates the Project trip distribution patterns. Approximately fifty percent (50%) of the project traffic is anticipated to travel to and from the northwest, via Chaney Street to/from Collier Avenue.

Existing Plus Project Traffic Volumes

The Existing plus Project (E+P) scenario is intended to identify the significant Project impacts associated with the proposed Project on the existing circulation system. The E+P traffic conditions include existing traffic in addition to the traffic generated by the proposed Project. Appendix H, Exhibit 2 also shows the weekday AM and PM peak hour intersection turning movement volumes for Existing (2019) With Project traffic conditions.

Opening Year Plus Project Traffic Volumes

To provide an assessment of the potential project-related and cumulative traffic impacts, the “buildup” method was used to develop traffic forecasts for Opening Year (2021) traffic conditions for Existing plus Ambient Projects plus Cumulative Projects plus Project (EAPC). The EAPC scenario is intended to identify near-term cumulative impacts on the planned near-term circulation system. The EAPC traffic conditions include background traffic within the study area and the traffic generated by the proposed Project.

Future year traffic forecasts have been based upon background (ambient) growth at 4.04% for 2021 traffic conditions (2% per year compounded annually). The ambient growth factor is intended to approximate regional traffic growth. This ambient growth rate is added to existing traffic volumes to account for area-wide growth not reflected by cumulative development projects. Ambient growth has been added to daily and peak hour traffic volumes on surrounding roadways, in addition to traffic generated by the development of future projects that have been approved but not yet built and/or for which development applications have been filed and are under consideration by governing agencies.

Intersection Analysis

The intersection operations analysis results are summarized in Table 14, which indicates that the intersection of Collier Avenue at Chaney Street is currently operating at acceptable LOS during the peak hours. Traffic signal warrants for Existing traffic conditions are based on existing peak hour intersection turning volumes. The intersection of Collier Avenue at Chaney Street currently warrants a traffic signal for Existing traffic conditions.

Table 14: Collier Avenue (NS) / Chaney Street (EW) Intersection Analysis Results

ANALYSIS SCENARIO	Traffic Control ³	Intersection Approach Lanes ¹												Delay ² (Secs)		Level of Service ²	
		Northbound			Southbound			Eastbound			Westbound			AM	PM	AM	PM
		L	T	R	L	T	R	L	T	R	L	T	R				
Existing (2019) Traffic Conditions	CCS	0.5	0.5	0	0	1	1	1	0	1	0	0	0	27.2	19.5	D	C
E+P Traffic Conditions	CSS	0.5	0.5	0	0	1	1	1	0	1	0	0	0	28.6	21.4	D	C
EAPC Traffic Conditions																	
- Without Improvements	CSS	0.5	0.5	0	0	1	1	1	0	1	0	0	0	>100	79.9	F	F
- With Improvements	TS	1	1	0	0	1	1	1	0	1	0	0	0	36.0	25.7	D	C

¹When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; 1 = Improvement

²Per the Highway Capacity Manual 6th Edition (HCM6), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control.

For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

Delay and level of service is calculated using Synchro 10.1 analysis software.

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

³ CSS = Cross-street Stop; TS = Traffic Signal

LOS calculations were conducted to evaluate operations of the intersection of Collier Avenue at Chaney Street under Existing (2019) Plus Project conditions. Table 14 contains the results of this analysis. Collier Avenue at Chaney Street is anticipated to experience acceptable operations for Existing Plus Project conditions.

LOS calculations were conducted for Collier Avenue at Chaney Street to evaluate operations under Opening Year (2021) Plus Project conditions. Intersection operations analysis worksheets for EAPC (2021) conditions are included in Attachment 6 of this letter. Table 14 contains the results of this analysis.

Collier Avenue at Chaney Street is anticipated to experience deficient operations for Opening Year Plus Project conditions, and a cumulative impact is found. Cumulative traffic impacts are deficiencies that are not directly caused by the Project, but occur as a result of regional growth combined with that or other nearby cumulative development projects or if the Project is anticipated to contribute traffic to a deficient intersection under pre-project conditions.

The City of Lake Elsinore has created its own local Traffic Impact Fee (TIF) program to impose and collect fees from new residential, commercial and industrial development for the purpose of funding roadways and intersections necessary to accommodate City growth as identified in the City's General Plan Circulation Element. The City's TIF program includes facilities that are not part of, or which may exceed improvements identified and covered by the TUMF program. The intersection of Chaney Street / Collier Avenue, forecasted to be cumulatively impacted by the Project, has planned improvements through the City's TIF Program. The Project will be subject to the City of Lake Elsinore's TIF fee program, and will pay the requisite City of Lake Elsinore TIF fees at the rates then in effect pursuant to the Lake Elsinore Municipal Code.

MM Trans 1 requires the Project to pay its fair-share for the construction of a traffic signal at the intersection of Collier Avenue at Chaney Street, combined with a separate northbound left turn lane from Collier Avenue to Chaney Street to address the deficiency for EAPC (2021) traffic conditions. The fair-share calculations for the traffic signal at Collier Avenue and Chaney Street and related northbound left turn improvement indicate that the Project contributes 10.20% in the AM peak hour and 9.15% in the PM peak hour of new vehicle trips to the cumulatively impacted intersection of Collier Avenue at Chaney Street. With this mitigation, the intersection is forecast to operate at LOS D during the AM peak hour and LOS C during the PM peak hour. With implementation of mitigation measure **MM Trans 1**, impacts to Cumulative Condition will be reduced to less than significant

Mitigation Measure:

MM Trans 1: Pay Project Fair-Share. Prior to issuance of Certificate of Occupancy, the Property Owner/Developer shall pay its fair-share to construct:

- a) A traffic signal at the intersection of Collier Avenue at Chaney Street.
- b) A separate northbound left turn lane from Collier Avenue to Chaney Street.

(Sources: Focused Traffic Evaluation – Appendix I)

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? (Less than Significant Impact with Mitigation Incorporated)

Each county in California is required to develop a Congestion Management Program (CMP) that analyzes the links between land use, transportation and air quality. The Riverside County Transportation Commission (RCTC) is the County of Riverside's Congestion Management Agency. The RCTC prepares and periodically updates the County's CMP to meet federal Congestion Management System guidelines and state CMP legislation.

According to Table 2-1-CMP System of Highways and Roadways, in the 2011 Riverside County Congestion Management Program, the RCTC has defined the CMP roadway system in Lake Elsinore to be State Route 74 (SR-74) and Interstate 15 (I-15). All local jurisdictions are responsible for determining the impacts of local development/land use decisions on the CMP roadway system. RCTC requires local agencies whose developments impact the CMP system by causing the Level of Service (LOS) on a non-exempt segment to fall to "F" to prepare deficiency plans.

The Project facilities will not impact any highways or roadways identified in the current CMP. With **MM Trans 1**, the Project would not result in an individual or cumulative exceedance of an established level of service standard. Therefore, with respect to a conflict with the applicable CMP, no impact will occur.

Mitigation Measure: MM Trans 1, as defined in Item XVII.a, above.

(Sources: General Plan EIR; RCTC CMP; Focused Traffic Evaluation – Appendix I)

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

The Proposed Project would not increase hazards due to design features or incompatible uses. The Proposed Project would be consistent with the on-site and surrounding zoning designations, and implementation of the Proposed Project would not introduce incompatible uses to the Project Area. The Proposed Project would not include any offsite features that would extend into the public right-of-way or otherwise interfere with circulation or result in traffic hazards. Therefore, potential impacts associated with hazardous geometric design features would be less than significant.

Mitigation Measure: No mitigation measures are required.

(Sources: General Plan EIR; Zoning Map; Focused Traffic Evaluation – Appendix I)

d) Result in inadequate emergency access? (Less than Significant Impact)

The Proposed Project would be constructed on a vacant lot on the southwest corner of Chaney Street and Minthorn Street, both of which would be improved to their ultimate right-of-way along the frontage of the Project Site as part of the Proposed Project. The Project Site would be accessible by emergency vehicles at each of its two driveways, one each on Chaney Street and Minthorn Street. The proposed Project is required to comply with the City's development review process including review for compliance with the all applicable fire code requirements for construction and access to the site. The Project will be reviewed by the City Fire Department to determine the specific fire requirements applicable to the Project and to ensure compliance with these requirements. This will ensure that the proposed Project would provide adequate emergency access to and from the site. Further, the City Engineer and the City Fire Department will review any modifications to existing roadways to ensure that adequate emergency access or emergency response would be maintained. Thus, implementation of the proposed Project will not result in inadequate emergency access. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, Focused Traffic Evaluation – Appendix I)

XVIII. TRIBAL CULTURAL RESOURCES

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). (Less than Significant Impact)

As noted in Threshold V.a., and V.b., respectively, there were no cultural resources recorded at the Project site by either a records search nor an intensive pedestrian survey. Therefore, impacts to historical resources are a less than significant impact.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR; Site Visit; Phase I ESA - Appendix C)

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (Less than Significant with Mitigation Incorporated)

Assembly Bill 52 (AB 52), signed into law in 2014, amended CEQA and established new requirements for tribal notification and consultation. AB 52 applies to all projects for which a notice of preparation or notice of intent to adopt a negative declaration/mitigated negative

declaration is issued after July 1, 2015. AB 52 also broadly defines a new resource category of tribal cultural resources and established a more robust process for meaningful consultation that includes:

- prescribed notification and response timelines;
- consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and
- documentation of all consultation efforts to support CEQA findings.

A tribe must submit a written request to the relevant lead agency if it wishes to be notified of projects within its traditionally and culturally affiliated area. The lead agency must provide written, formal notification to the tribes that have requested it within 14 days of determining that a project application is complete or deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either 1) the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per Public Resources Code §21082.3(c).

On August 28, 2019, the City provided written notification of the Project in accordance with AB 52 to all of the Native American tribes that requested to receive such notification from the City. Of the tribes notified, the Rincon Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, and the Soboba Band of Luiseño Indians requested formal government-to-government consultation under AB 52. The City met with Soboba on October 1, 2019 and with Rincon on October 24, 2019. The Phase I cultural resources inventory of the project indicates that there is very low potential for the inadvertent discovery of cultural resources during groundbreaking activities. The EIC records indicate that no cultural resources have been recorded within the project site, and no resources were identified during the pedestrian survey. The report concluded that given the level of disturbance at the site, it is very unlikely that intact archaeological resources are still present subsurface. On November 7, 2019, the City sent recommended mitigation measures to Pechanga, Rincon and Soboba that address unanticipated discoveries of cultural resources and human remains during groundbreaking activities. Consultation was concluded on November 8, 2019 with Rincon and on December 13, 2019 with both Pechanga and Soboba. As a result of these consultations, with implementation of **MM Cul 1** and **MM Cul 2** in Section V, Cultural Resources of this Initial Study, AB52 consultation with Rincon, Soboba, and Pechanga have been concluded and potential impacts associated with Tribal Cultural Resources would be less than significant.

Mitigation Measures: MM Cul 1 and MM Cul 2, as defined in Section V above.

(Sources: City of Lake Elsinore; Phase I Cultural Report - Appendix B)

XIX. UTILITIES AND SERVICE SYSTEMS

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Less than Significant Impact)

The Proposed Project would be within the service boundary for the Elsinore Valley Municipal Water District (EVMWD). The EVMWD issued Service Planning Letter #3223-0 (Appendix J) to the Applicant on May 20, 2019, in which the EVMWD determined that water is available to serve the Proposed Project and the project would need to connect to the sewer mainline in Chaney Street at the manhole in front of the Project. The Proposed Project would be served by the existing water and wastewater treatment facilities, and the Property Owner/Developer would pay all development impacts fees associated with water and wastewater service. Therefore, potential impacts associated with water or wastewater treatment facilities would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, LEMC, EVMWD Service Planning Letter - Appendix J)

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (Less than Significant Impact).

EVMWD obtains its potable water supplies from imported water from Metropolitan Water District (MWD), local surface water from Canyon Lake, and local groundwater from the Elsinore Basin. According to EVMWD's 2015 Urban Water Management Plan (UWMP), EVMWD has determined that its current and anticipated future supplies are sufficient to meet the projected dry-year and multiple dry-year demand. The EVMWD issued Service Planning Letter #3223-0 (Appendix I) to the Applicant on May 20, 2019, in which the EVMWD determined that water is available to serve the Proposed Project and a sewer line extension would be required on Collier Avenue, which would be constructed as part of the Proposed Project. There are sufficient water supplies as well as water shortage contingency plans to protect existing and future water needs within the EVMWD service area. Therefore, potential impacts associated with water supplies would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, EVMWD Service Planning Letter - Appendix J)

c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Less than Significant Impact)

The EVMWD is responsible for the City's wastewater treatment plant. The EVMWD issued Service Planning Letter #3223-0 (Appendix I) to the Applicant on May 20, 2019, in which the EVMWD determined that water is available to serve the Proposed Project and a sewer line extension would be required on Collier Avenue, which would be constructed as part of the Proposed Project. The Property Owner/Developer would be required to pay development impacts fees. Therefore, potential impacts associated with wastewater treatment capacity would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: EVMWD Service Planning Letter - Appendix J)

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? (Less than Significant Impact)

CR&R, Inc. Environmental Services is the solid waste disposal service provider for the City of Lake Elsinore and parts of Riverside County. Riverside County Department of Waste Resources (RCDWR) facilitates waste management services for Riverside County. These services are provided on a countywide basis, and each private or public entity determines which landfill or transfer station to use, which is mostly based on geographic proximity. The landfills typically used by the City of Lake Elsinore are the El Sobrante, Badlands, and Lamb Canyon Landfills. All three of the landfills are Class III municipal solid waste landfills. El Sobrante Landfill is expected to reach capacity by 2045. Badlands Landfill is expected to reach capacity by 2024 and Lamb Canyon Landfill by 2021. Both Badlands and Lamb Canyon Landfills have the potential to expand their facilities and capacity. Chapter 14.12 of the LEMC requires that project applicant divert a minimum of 50 percent of construction and demolition debris, and the Property Owner/Developer would meet this requirement. The existing landfills have sufficient capacity to serve the Proposed Project, and recycling and green waste collection would reduce overall solid waste generated. Therefore, potential impacts associated with solid waste disposal would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, LEMC)

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (Less than Significant Impact)

The California Integrated Waste Management Act of 1989 (AB 939, Sher, Chapter 1095, Statutes of 1989 as amended [IWMA]) under the Public Resource Code requires that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000, and 50% diversion each year following. As of 2006, the City achieved a 50 percent waste diversion rate. In addition, Chapter 14.12 of the LEMC requires that project applicant divert a minimum of 50 percent of

construction and demolition debris, and the Property Owner/Developer would meet this requirement. The Proposed Project would comply with federal, state, and local statutes and regulations related to solid waste. Therefore, potential impacts associated with solid waste would be less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, PRC, LEMC)

XX. WILDFIRES

- a) **Substantially impair an adopted emergency response plan or emergency evacuation plan? (No Impact)**
- 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? (No Impact)**
- 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? (No Impact)**
- d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? (No Impact)**

According to the California Department of Forestry and Fire Protection, Riverside County Fire Hazard Severity Zone Maps and the City of Lake Elsinore General Plan EIR Figure 3.10-2 (City of Lake Elsinore Wildfire Susceptibility), the Project Site is not located in a High or Very High Fire Hazard Severity Zone. The Project Site is vacant and bound by vacant land to the northwest, south and west and by commercial/industrial uses to the northeast and east. As part of the plan check process, the Project Site plan would undergo a fire, life, and safety review by the City Fire Department to determine the specific fire requirements applicable to ensure compliance with these requirements. Therefore, no impacts associated with wildland fires would occur.

Mitigation Measures: No mitigation measures are required.

(Sources: California Department of Forestry and Fire Protection, Riverside County Fire Hazard Severity Zone Maps, General Plan EIR Figure 3.10-2 - City of Lake Elsinore Wildfire Susceptibility)

V. MANDATORY FINDINGS OF SIGNIFICANCE

The following are Mandatory Findings of Significance in accordance with Section 21083 of CEQA and Section 15065 of the CEQA Guidelines.

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

As discussed throughout this Initial Study, the proposed Project area contains some sensitive biological resources that could potentially be affected by the proposed Project. All potentially significant impacts to biological resources would be avoided or reduced to a less than significant impact with the implementation of mitigation measures **MM Bio 1** through **MM Bio 3** identified in this initial study as well as design features and measures already incorporated into the Project.

The presence of any previously recorded or potential cultural resources was not found on the proposed Project site. Further, the site has been previously disturbed and it is highly unlikely that any cultural resources exist. However, in order to provide protection in the unlikely event that cultural resources or human remains are unearthed during Project construction, implementation of mitigation measures **MM Cul 1** through **MM Cul 2** will reduce potential impacts to less than significant.

Thus, the proposed Project's will not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Therefore, impacts are less than significant with mitigation incorporated.

Mitigation Measures: MM Bio 1 through MM Bio 3 and MM Cul 1 through MM Cul 2

(Sources: Above Initial Study)

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? (Less than Significant Impact with Mitigation Incorporated)**

The Proposed Project would result in potentially significant project-specific impacts to biological resources, cultural resources, noise, tribal cultural resources, and transportation/traffic impacts. However, all mitigation measures have been identified that would reduce these impacts to less than significant levels. The Air Quality and Transportation/Traffic analyses of this document considered cumulative impacts in their respective analyses, and mitigation measures would be required to reduce cumulative impacts associated with Transportation/Traffic. No additional mitigation measures would be required to reduce cumulative impacts to less than significant

levels.

Mitigation Measures: MM Trans 1

(Sources: Above Initial Study)

- c) **Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (Less than Significant Impact with Mitigation Incorporated)**

Effects on human beings were evaluated as part of this analysis of this initial study and found to be less than significant with implementation of mitigation measures in biological resources, cultural/paleontological resources, geology and soils, noise, and traffic. With implementation of **MM NOI 1**, noise will not increase due to the Project. Based on the analysis and conclusions in this initial study, the proposed Project will not cause substantial adverse effects directly or indirectly to human beings. Therefore, potential direct and indirect impacts on human beings that result from the proposed Project are considered less than significant with mitigation incorporated.

Mitigation Measures: MM NOI 1

(Sources: Above Initial Study)

VI. PERSONS AND ORGANIZATIONS CONSULTED

This section identifies those persons who prepared or contributed to the preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

City of Lake Elsinore

Damaris Abraham, Senior Planner
Nick Lowe, PE|MS, Consultant Traffic Engineer
Dina Purvis, Senior Engineering Technician

VII. REFERENCES

The following documents were used as information sources during preparation of this document. Except as noted, 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.

- AQ Report *Air Quality Impact Analysis, Pennington Industrial Project, City of Lake Elsinore*, prepared by Urban Crossroads, dated July 10, 2019. (Appendix A)
- Cultural Report *Cultural Resources Inventory for the Pennington Project, Lake Elsinore, California*, prepared by DUDEK, dated November 4, 2019
- CalRecycle California Department of Resources Recycling and Recovery, *Lake Elsinore Jurisdiction Diversion / Disposal Rate Detail*, 2006. (Available at <https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionPost2006>, accessed September 2019.)
- CAP City of Lake Elsinore, Climate Action Plan, approved December 13, 2011. (Available at <http://www.lake-elsinore.org/home/showdocument?id=7249>, accessed September 2019.)
- CCR California Code of Regulations. (Available at <https://govt.westlaw.com/calregs/Index?transitionType=Default&contextData=%28sc.Default%29>, accessed September 2019.)
- Code of Federal Regulations Code of Federal Regulations, Title 49 Transportation. (Available at http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title49/49tab_02.tpl, accessed September 2019.)
- DOC California Department of Conservation, *California Important Farmland Finder*. (Available at <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed September 2019.)
- DOC WA California Department of Conservation, Land Conservation (Williamson) Act, Riverside County Land Conservation Act Map. (Available at ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Riverside_w_15_16_WA.pdf, accessed September 2019.)

DTSC	California Department of Toxic Substances Control, EnviroStor Database. (Available at http://www.envirostor.dtsc.ca.gov/public/ , accessed September 2019.)
EVMWD	Service Planning Letter #3223-0, Elsinore Valley Municipal Water District, May 20, 2019. (Appendix I)
FEMA	Federal Emergency Management Agency, Flood Map Number 06065C2036G. (Available at https://msc.fema.gov/portal/search?AddressQuery=Lake%20Elsinore%2C%20CA#searchresultsanchor , accessed September 2019.)
General Plan	City of Lake Elsinore, City of Lake Elsinore General Plan, adopted December 13, 2011. (Available at http://www.lake-elsinore.org/city-hall/city-departments/community-development/planning/lake-elsinore-general-plan , accessed September 2019.)
General Plan EIR	City of Lake Elsinore, City of Lake Elsinore General Plan Update Final Recirculated Program Environmental Impact Report, certified December 13, 2011. (Available at http://www.lake-elsinore.org/city-hall/city-departments/community-development/planning/lake-elsinore-general-plan/general-plan-certified-eir , accessed September 2019.)
General Plan LU Map	City of Lake Elsinore, General Plan Land Use Map, adopted December 13, 2011. (Available at http://www.lake-elsinore.org/home/showdocument?id=24827 , accessed September 2019.)
GHG Report	<i>Greenhous Gas Analysis, Pennington Industrial Project, City of Lake Elsinore</i> , prepared by Urban Crossroads, dated July 10, 2019 (Appendix G)
Geotech	<i>Preliminary Geotechnical Interpretive Report Proposed Commercial Development, Assessor's Parcel Number 377-160-014, South Corner of Chaney & West Minthorn Streets, City of Lake Elsinore, Riverside County, California</i> , prepared by CW Soils, dated February 27, 2019. (Appendix B)
Health and Safety Code	California Health and Safety Code. (Available at https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=HSC , accessed September 2019.)
Hydro	<i>Preliminary Drainage Report for Pennington Industrial, South Corner of Chaney & West Minthorn Streets, City of Lake Elsinore, Riverside County, California</i> , prepared by SB&O Inc., dated May 17, 2019. (Appendix D)
LEMC	City of Lake Elsinore, <i>Lake Elsinore Municipal Code</i> , 2019. (Available at http://www.codepublishing.com/CA/LakeElsinore/ , accessed September 2019.)
NIA	<i>Noise Impact Analysis, Pennington Industrial, City of Lake Elsinore</i> , prepared by Urban Crossroads, dated July 23, 2019. (Appendix F)
P-WQMP	<i>Project Specific Water Quality Management Plan, Pennington Industrial Park</i> , prepared by SB&O Inc., dated February 27, 2019 (Revised May 17, 2019). (Appendix E)
Phase I ESA	<i>Environmental Site Assessment - Phase I, Undeveloped Property, APN: 377-160-014, Southern corner of West Minthorn Street and Chaney Street, Lake Elsinore, California 92530</i> , prepared by California Environmental, dated July 2018.

	(Appendix C)
RC GIS	County of Riverside, Riverside County Geographic Information System, Map My County –Riverside County. (Available at https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public , accessed September 2019.)
SWRCB	State Water Resources Control Board, <i>National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ amended by 2010-0014-DWQ & 2012-0006-DWQ, NPDES No. CAS000002</i> , July 17, 2012. (Available at http://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/constpermits/wqo_2009_0009_complete.pdf , accessed September 2019).
TIA	Focused Traffic Evaluation, Pennington Industrial Project, City of Lake Elsinore, prepared by Urban Crossroads, dated July 29, 2019. (Appendix H)
WQCPSARB	State of California, <i>1995 Water Quality Control Plan for the Santa Ana River Basin</i> , February 2016 (Available at https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/index.shtml accessed September 2019.)
Zoning Map	City of Lake Elsinore, Zoning Map, September 9, 2019. (Available at http://www.lake-elsinore.org/home/showdocument?id=24829 , accessed September 2019)