



ROME HILL COMMERCIAL PROJECT

Planning Application No. 2021-19
General Plan Amendment No. 2022-01
Zone Change No. 2022-02
Conditional Use Permit No. 2022-17
Commercial Design Review No. 2022-12
Variance No. 2025-08

ENVIRONMENTAL REVIEW NO. 2025-02

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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September 2025

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LIST OF ABBREVIATIONS AND ACROYNMS

AFY	Acre-feet per year
ADT	Average Daily Traffic
APE	Area of Potential Effect
APN	Assessor's Parcel Number
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
BMPs	Best Management Practices
BUOW	Burrowing Owl
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CDR	Commercial Design Review
CEQA	California Environmental Quality Act
CH4	Methane
CFC	Chlorofluorocarbons
C-M	Commercial Manufacturing
CMU	Concrete Masonry Unit
CO	Carbon Monoxide
CO2	Carbon Dioxide
CP	Commercial Park
CUP	Conditional Use Permit
dBA	A-weighted decibel
DIF	Development Impact Fees
Drec	Distance from Equipment to Receiver in Feet
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
EVMWD	Elsinore Valley Municipal Water District
FEMA	Federal Emergency Management Agency
FGC	Fish & Game Code
FIRMette	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Association
GC	General Commercial
GHG	Greenhouse Gas
GPA	General Plan Amendment

GPEIR	General Plan Environmental Impact Report
HDR	High Density Residential
HRA	Health Risk Assessment
IS/MND	Initial Study and Mitigated Negative Declaration
ISTEA	Intermodal Surface Transportation Efficiency Act
ITE	Institute of Transportation Engineers
LDA	Light Duty Autos
LEMC	Lake Elsinore Municipal Code
Leq	Equivalent Continuous Sound Level
Lmin	Minimum time-weighted sound level recorded during a specific period
Lmax	Maximum time-weighted sound level recorded during a measurement period
LI	Light Industrial
LST	Localized Significance Thresholds
MBTA	Migratory Bird Treaty Act
MND	Mitigated Negative Declaration
MSHCP	Multiple Species Habitat Conservation Plan
MSL	Mean Sea Level
MTCO2e	Metric Tons of Carbon Dioxide Equivalent
NBP	Nesting Bird Plan
NO2	Nitrous Oxide
NOI	Notice of Intent
NOx	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System
OEHHA	Office of Environmental Health Hazards
PM	Particulate Matter
PPV	Peak Particle Velocity
RMS	Root Mean Squared
ROW	Rights-of-Way
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCH	State Clearing House
SF	Square Feet
SGMA	Sustainable Groundwater Management Act
SO2	Sulfur Dioxide

SRA	State Responsibility Area
SWPPP	Storm Water Pollution Prevention Plan
TIA	Traffic Impact Analysis
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VdB	Vibration-velocity decibel
VMT	Vehicle miles traveled
VOC	Volatile Organic Compound
WRCOG	Western Riverside Council of Governments
WSA	Water Supply Assessment
WQMP	Water Quality Management Plan
ZC	Zone Change

I. INTRODUCTION

A. PURPOSE

This document is an Initial Study for evaluation of environmental impacts resulting from implementation of the Rome Hill Commercial Project. For purposes of this document, this application will be called the “project” or “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 environmental determination (document) to provide the necessary environmental evaluations and clearance.

This Initial Study and Mitigated Negative Declaration (IS/MND) 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 other responsible public agencies or agencies 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, as Lead Agency, has determined that environmental clearance for the proposed project can be provided with an IS/MND. 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. **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.

- I. PROJECT DESCRIPTION** describes the proposed project. A description of discretionary approvals and permits required for project implementation is also included.
- II. ENVIRONMENTAL CHECKLIST** 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.
- III. 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.
- IV. 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.
- V. PERSONS AND ORGANIZATIONS CONSULTED** identifies those individuals consulted and involved in the preparation of this Initial Study and Mitigated Negative Declaration.
- VI. 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. Responses will consider the whole action involved, including off site as well as on site, 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/Negative Declaration 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 and Greenhouse Gas Analysis Report
 - Appendix B: Biological Assessment and MSHCP Consistency
 - Appendix C: Bio Joint Review Findings
 - Appendix D: Cultural Resources Survey Report
 - Appendix E: Paleontological Resources Assessment
 - Appendix F: Geotechnical Report
 - Appendix G: Phase I Environmental Assessment
 - Appendix H: Noise Impact Analysis
 - Appendix I: Trip Generation and VMT Analysis
- c. The above-listed documents and technical studies are available for review at:
City of Lake Elsinore (Main City Hall)
130 S. Main Street
Lake Elsinore, California 92530
Hours: Monday - Thursday: 8 a.m. - 5 p.m.
Friday: 8 a.m. - 4 p.m. Closed Holidays

Community Development Department (Temporary Office)
301 N. Spring Street
Lake Elsinore, California 92530
Hours: Monday - Thursday: 8 a.m. - 5 p.m.
Friday: 8 a.m. - 4 p.m. Closed Holidays

II. PROJECT DESCRIPTION

Planning Application No. 2021-19 (Rome Hill Commercial)

Introduction

GEM Investments, LLC, is proposing to construct two commercial buildings on a 6.77-acre project site located in southeast Lake Elsinore at Grand Avenue and Vail Street. The proposed project is envisioned to be developed in two (2) Phases, with two approximately same same-sized structures that are designed to function as commercial manufacturing buildings. This Initial Study (IS) has been prepared to provide the public and City of Lake Elsinore decision-makers with an evaluation of potential physical environmental impacts that may be caused by implementing this proposed project.

Project Location

The proposed project encompasses approximately 6.77 acres located on Grand Avenue and Kathryn Way (APN 371-150-017) in the City of Lake Elsinore. This project site can be found on the Lake Elsinore 7.5' Series USGS Topographic Map. It is located within the La Laguna (Stearns) Land Grant so it has no section number, but it would be located within T6S, R4W, San Bernardino Base & Meridian. The site is located at approximately Latitude -33.63384 and Longitude -117.3329.

Project Elements

The project is requesting the following entitlements: a General Plan Amendment (GPA 2022-01) to amend the Land Use Designation of the project site from General Commercial (GC) and High Density Residential (HDR) to Light Industrial (LI); Zone Change (ZC 2022-02) to change the zoning from Commercial Park (C-P) and High Density Residential (R-3) to Commercial Manufacturing (C-M); Conditional Use Permit (CUP 2022-17) to establish outdoor storage; Commercial Design Review (CDR 2022-12) to construct two (2) new commercial manufacturing warehouses with office space totaling 92,760 sq. ft.; and Variance (VAR 2025-08) to reduce the required front yard setback from 15 ft. to 6 ft. due to site constraints.

The proposed Rome Hill project would develop the 6.77-acre project site with two buildings. The property is a long rectangular lot that fronts directly on Grand Avenue and will take access from Grand Avenue. Refer to Figures 1 (USGS Map), Figure 2 (aerial photo), and Figure 3 (Site Plan). The project proposes to phase the construction of the buildings in this order: Building 1 is proposed as Phase 1 which will consist of a 46,276 square foot (SF) building with the intended use of commercial manufacturing. There will be two 60 foot (ft.) long loading docks at the rear of the building on the east and west side of the building. Building 2 will constitute Phase 2 and will consist of a 46,484 SF commercial warehouse. Total building square footage is 92,760 SF.

The buildings will be two-story, unrefrigerated warehouse structures with mezzanines and offices. The following table summarizes the building square footages and the interior operating areas. (see attached table) The project also includes ample landscaping along Grand Avenue. This includes trees placed at the entrance of the new development and for additional visual diversity to the street frontage. A large number of trees are proposed throughout the site (adding diverse color and shade to the tenant parking areas). In addition, a wide variety of drought tolerant plant materials have been selected to create a lush outdoor environment while minimizing the amount of water consumption.

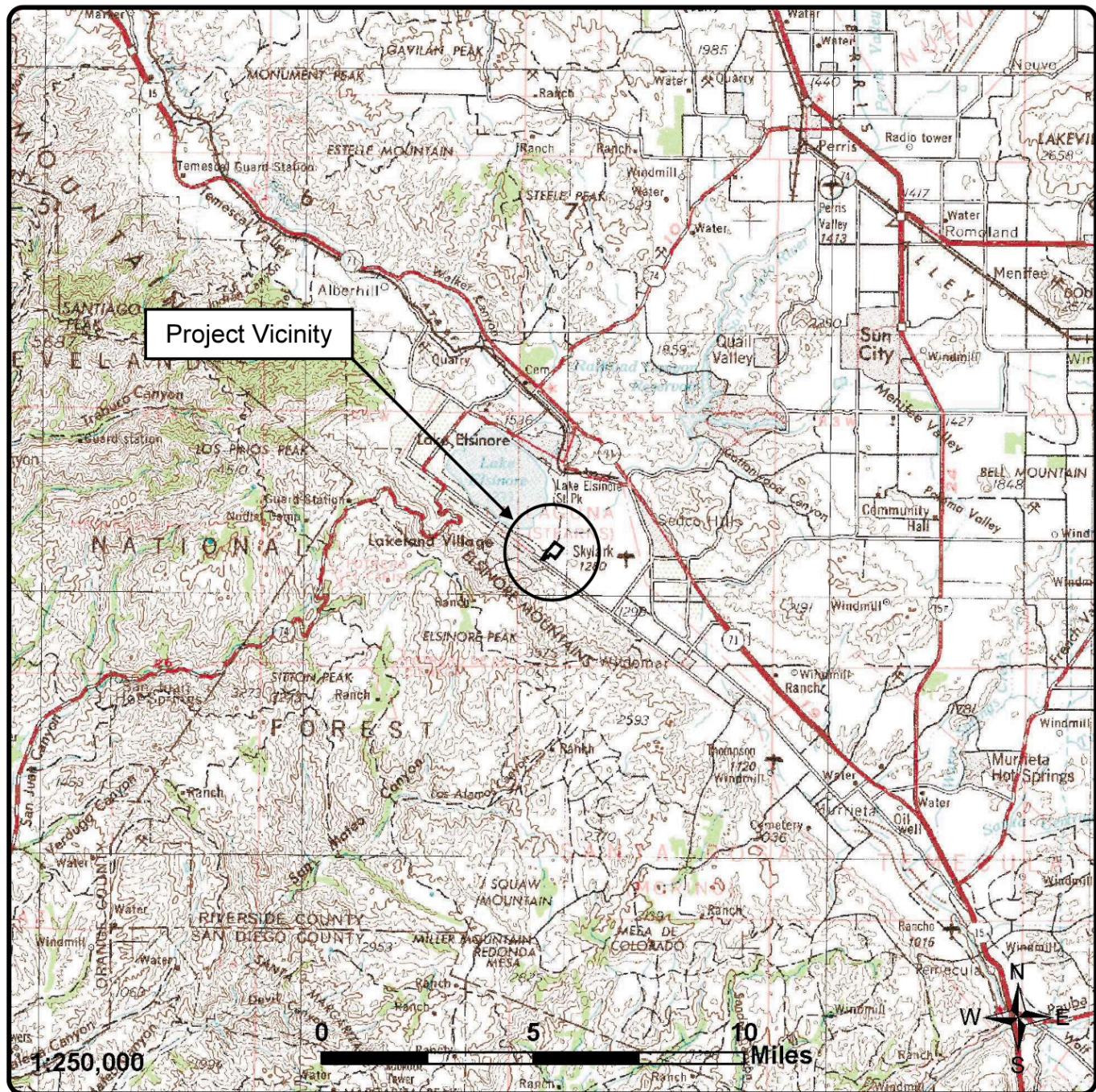


FIGURE 1

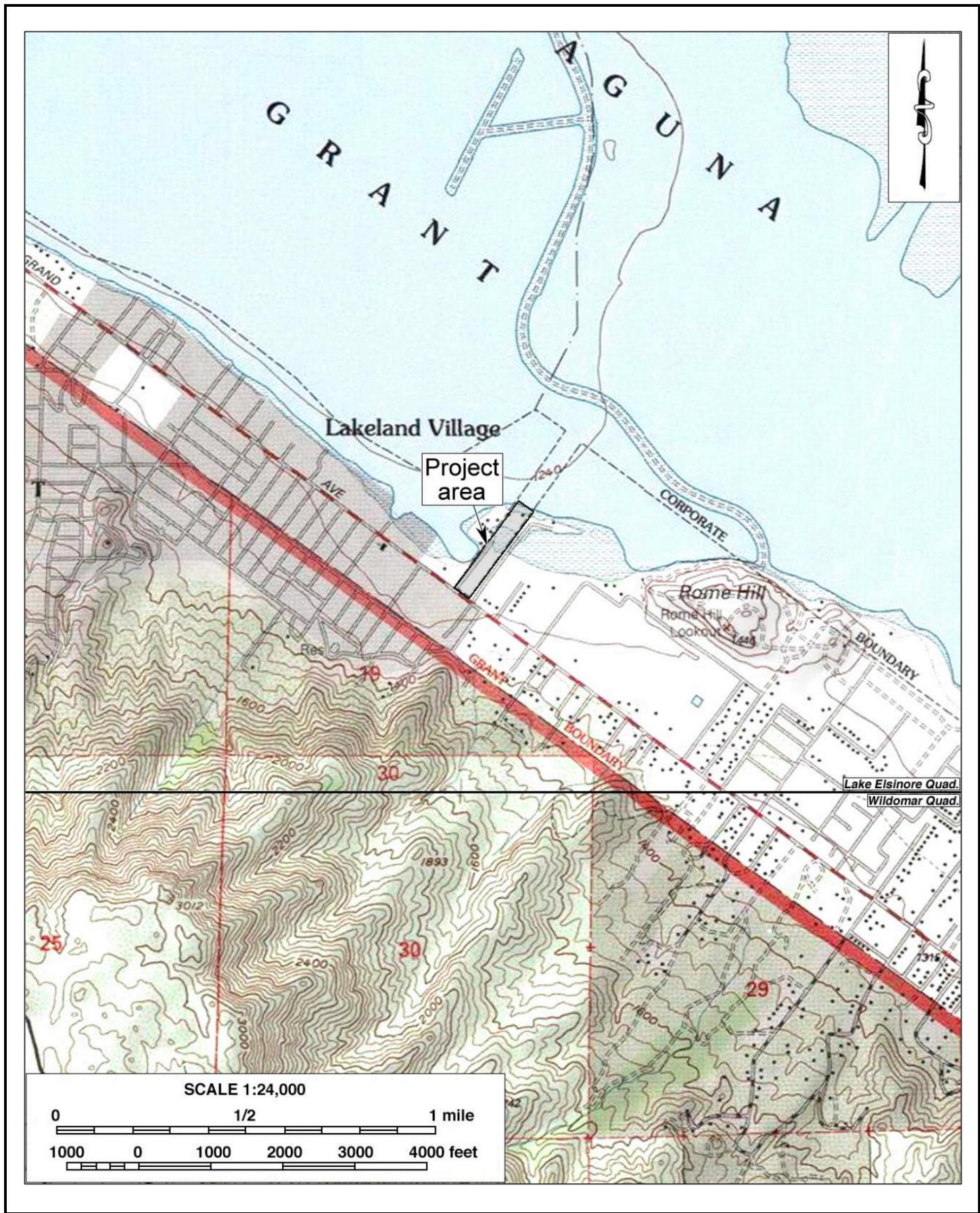


FIGURE 2



FIGURE 3

Table 1: Building Areas

BUILDING 1, SUITE 1 (PHASE - 1)	AREA	BUILDING 2, SUITE 1 (PHASE - 2)	AREA
1ST. FLR.-OFFICE	1,757	1ST. FLR.-OFFICE	1,757
OFFICE MEZZANINE	618	OFFICE MEZZANINE	618
WAREHOUSE	20,658	WAREHOUSE	20,765
FOOTPRINT S.F.	22,415	FOOTPRINT S.F.	22,522
TOTAL S.F.	23,033	TOTAL S.F.	23,140
BUILDING 1, SUITE 2 (PHASE - 1)	AREA	BUILDING 2, SUITE 2 (PHASE - 2)	AREA
1ST. FLR.-OFFICE	1,347	1ST. FLR.-OFFICE	1,347
OFFICE MEZZANINE	618	OFFICE MEZZANINE	618
WAREHOUSE	21,068	WAREHOUSE	21,175
FOOTPRINT S.F.	22,415	FOOTPRINT S.F.	22,522
TOTAL S.F.	23,033	TOTAL S.F.	23,140
TOTAL BUILDING 1, (PHASE - 1) FOOTPRINT	44,830	TOTAL BUILDING 2, (PHASE - 2) FOOTPRINT	45,044
TOTAL BUILDING 1, (PHASE - 1) AREA	46,066	TOTAL BUILDING 2, (PHASE - 2) AREA	46,280

The project proposes to construct a private driveway for access on the adjacent property (APN: 371-150-017) to the rear of the property. The parking lot islands are proposed as being landscaped along with the required trash enclosure areas throughout the site. The project includes 180 parking stalls, vehicular traffic circulation, CMU block walls and electric vehicle gates with Knox Boxes.

The project site is located within an area that contains existing infrastructure within the adjacent right-of-way. The proposed project would install onsite infrastructure that would connect to the existing infrastructure that surrounds the site as described below.

Water The project would connect to and be served by the existing 12 inch water infrastructure located on Grand Avenue.

Sewer The project would connect to and be served by the existing 15 inch sewer mainline located on site.

Drainage The project would install an onsite storm water drainage system that would route run-off to a proposed bio detention basin located in the north end of the property.

Other Infrastructure The project would connect to existing dry utility infrastructure located in the right-of-way in Grand Avenue.

Offsite Access Kathryn Way, the alignment of which lies within the County of Riverside, is being proposed as a private driveway for secondary access via a separate application with the County of Riverside Transportation Department.

Construction

The applicant has scheduled construction of the proposed project for late 2025 or beginning of 2026. A preliminary grading plan for the project site is provided as Figure 4 and the site is expected to balance with no import or export of soil.

Surrounding Land Uses

North: Open Space/Lake Elsinore

East: Mixed Use: Industrial and Residential (County of Riverside)

South: Industrial, Commercial, Undeveloped land (County of Riverside)

West: Industrial, Commercial, Undeveloped land (County of Riverside)

Other Agencies Whose Approval May Be Required

Based on an evaluation of the specific project location, the proposed project will not require any permits from other agencies to support development of the site as proposed by the applications. The amount of area to be disturbed by the whole project will be greater than one acre; therefore, the developer will be required to file a Notice of Intent (NOI) for a General Construction permit to comply with the National Pollutant Discharge Elimination System (NPDES) requirements. The NOI is filed with the State Water Resources Control Board and enforced by the Santa Ana Regional Water Quality Control Board. A Stormwater Pollution Prevention Plan (SWPPP) must be implemented in conjunction with construction activities to control water quality degradation. No other permits or agency requirements have been identified in conjunction with the proposed project. The proposal to construct a private driveway within the Kathryn Way will require review and approval from the County of Riverside.

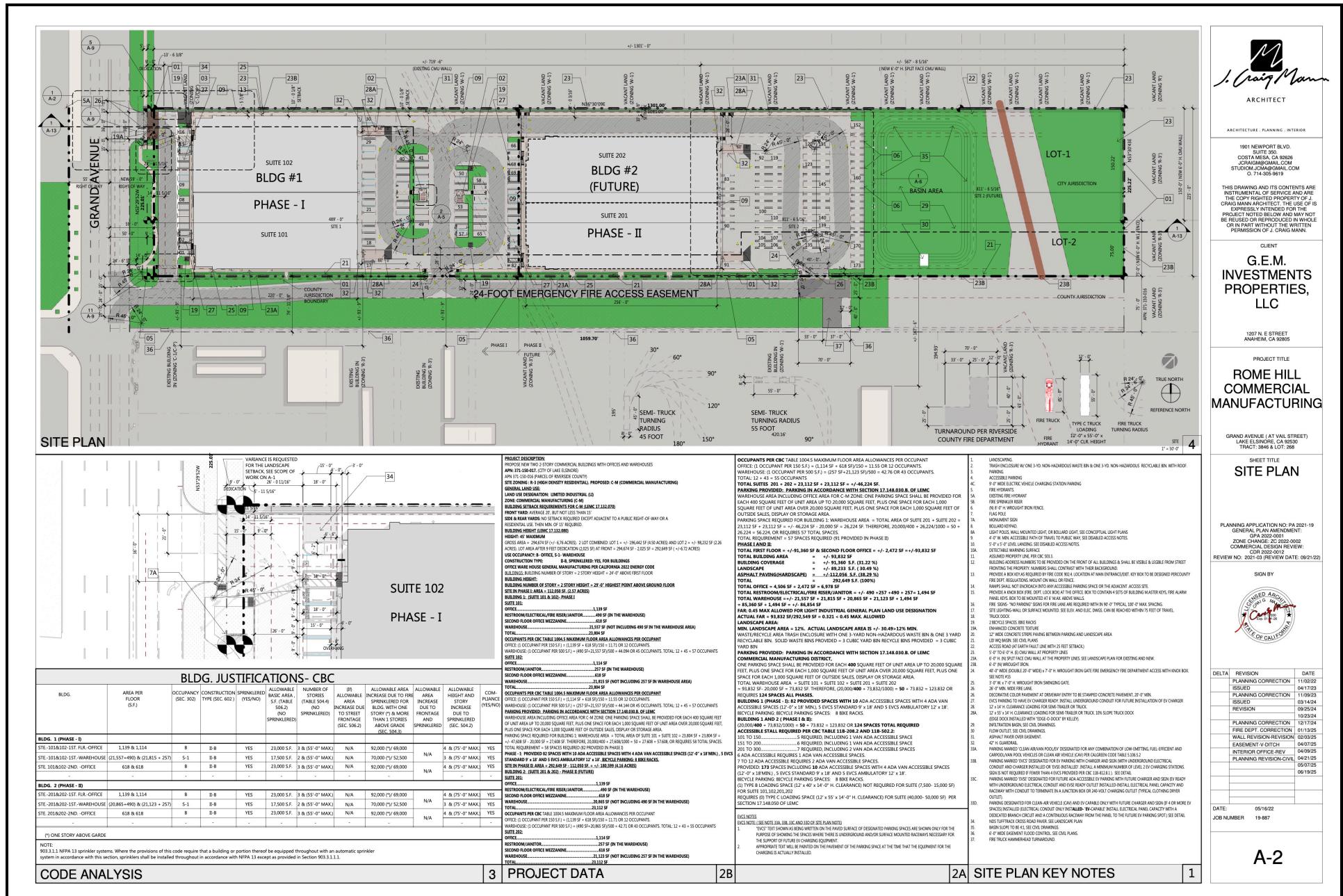


FIGURE 4

Site Plan

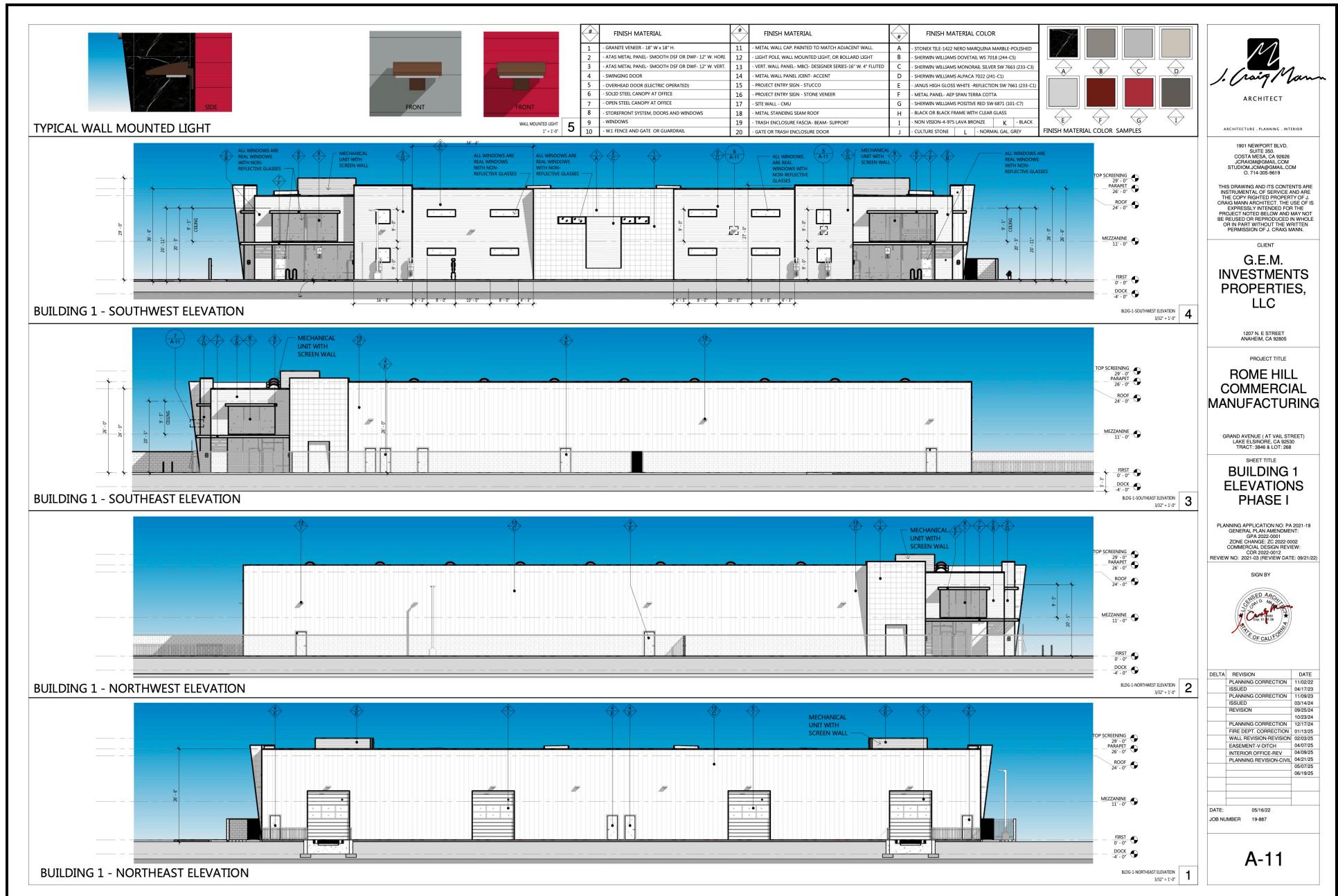
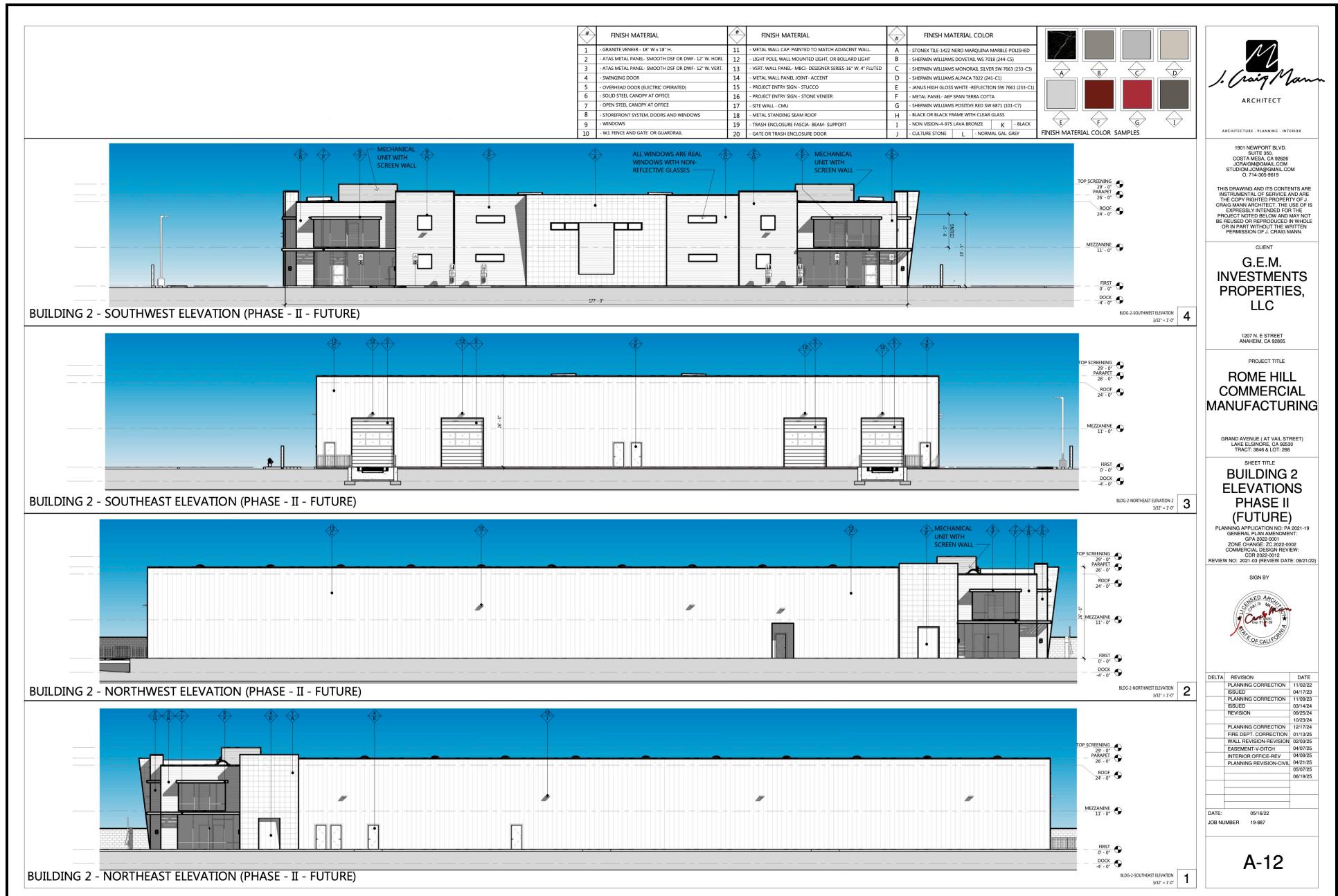


FIGURE 5a



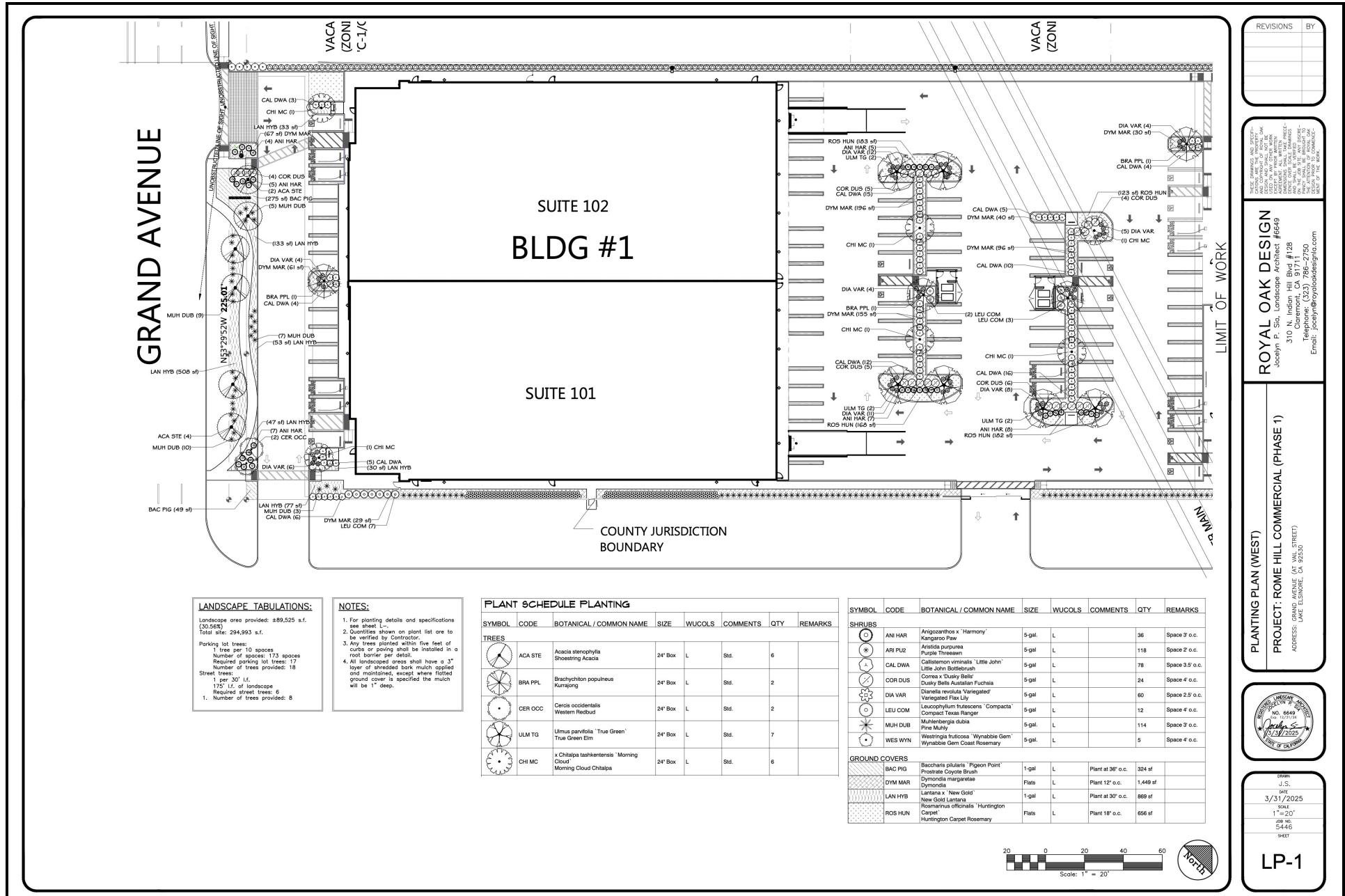


FIGURE 6a

Tom Dodson & Associates

Environmental Consultants

Conceptual Landscaping Plan (a)

III. ENVIRONMENTAL CHECKLIST

A. BACKGROUND

1. **Lead Agency Name and Address:** City of Lake Elsinore, 130 South Main Street, Lake Elsinore, CA 92530
2. **Contact Person and Phone Number:** Damaris Abraham, 951-848-4046; E-mail: dabraham@lake-elsinore.org
3. **Project Location:** The proposed project encompasses approximately 6.77 acres located on Grand Avenue and Vail Street (APN 371-150-017 and 371-150-016) in the City of Lake Elsinore within Riverside County.
4. **Project Sponsor's Name and Address:** GEM Investments, LLC.
5. **General Plan Designation:** General Commercial/Multi-Family Residential (High Density)
6. **Zoning:** Commercial Park (C-P)/Multi-Family Residential (R-3)
7. **Description of Project:** The proposed Rome Hill Commercial project would develop the 6.77-acre project site with two commercial manufacturing buildings. Total building square footage is 92,760 SF
8. **Surrounding Land Uses and Setting:**

North: Open Space/Lake Elsinore
East: Mixed Use: Industrial and Residential (County of Riverside)
South: Industrial, Commercial, Undeveloped land (County of Riverside)
West: Industrial, Commercial, Undeveloped land (County of Riverside)
9. **Other Public Agencies Whose Approval is Required:** Refer to description above
10. *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.?*

Yes. Native American tribes have been contacted, and the input is provided under the Tribal Cultural Resources section of the Initial Study.

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"/> Agriculture 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, Community Development Director

9/2/2025
Date

	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"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
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 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 CEQA Guidelines §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code 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 type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge, such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in 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				

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input 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"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel break, 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	<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
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)?				
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)*

Grand Avenue provides excellent public views to the scenic vistas that dominate the City of Lake Elsinore, which consist of Lake Elsinore, the surrounding foothills of Cleveland National Forest and the background Santa Ana-Elsinore Mountains to the west. The proposed project consists of a commercial manufacturing warehouse complex that will be developed within an area that is transitioning from undeveloped parcels to a mix of industrial, commercial and higher density residential urban development. The proposed development will alter the visual setting of the project site, but is not forecast to significantly impact any public scenic vistas. This finding is consistent with the City's General Plan Environmental Impact Report (GPEIR) which was adopted in 2011. The GPEIR found that full development of the City in accordance with the City policies and design guidelines would not result in any significant adverse impacts to scenic vistas as long as important public viewing corridors are maintained. Due to its location off Grand Avenue and the already existing surrounding urban development, visual access to the mountains and foothills are already highly disturbed. After construction of the proposed project, the new commercial buildings and identified landscaping will integrate the project site into this existing urban visual setting consistent with the City's design guidelines. Thus, the proposed project is consistent with this finding in the General Plan. Since conformance with City design guidelines and policies is mandatory, no mitigation is required and a finding of less than significant impact on scenic vistas is appropriate under this issue.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan Resource Protection & Preservation Element, General Plan EIR)

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)*

As indicated in the response to issue a), the proposed project will modify the visual setting of the project site, but the proposed modification will be designed consistent with City policies and design guidelines. The City does not have any designated scenic highways (Interstate 15 and State Route 74 are eligible for State designation, but not designated), therefore no disturbance of any scenic resources in proximity to a state scenic highway will occur. Further, the project site does not contain any notable trees, rock outcroppings or historic buildings that will be adversely impacted by developing the project site as proposed. Thus, impacts under this issue are considered less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: California State Scenic Highway System Map and General Plan Resource Protection & Preservation Element, General Plan EIR)

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 Impact)

The City's design review requirements will ensure that landscaping and architecture will be consistent with the surrounding urban uses. The proposed implementation of the project is not forecast to cause any significant negative alteration of any aesthetic or visual impacts when compared to these design guidelines. The project seeks a General Plan Amendment (GPA) to allow a commercial manufacturing development, but the existing zoning classification allows both commercial and high density residential, which would result in comparable structures on the property. If the GPA and zone change are approved, the proposed Rome Hill Commercial project will be fully consistent with the land use regulations and the project will comply with City design guidelines. Thus, the potential impact under this topic is less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan and General Plan EIR)

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)

The proposed project will introduce new lighting onto the project site with a potential to adversely impact nighttime views of the surrounding area and conflict with Mt. Palomar operations. However, the project must comply with Section 17.112.040 and Section 17.148.110 of the Lake Elsinore Municipal Code (LEMC) which requires that lighting shall be designed to preclude light shining into the sky above a horizontal plane passing through the luminaire and encourage the use of low pressure sodium lighting in non-residential development. Thus, compliance with General Plan Policy 13.2 and the LEMC will reduce any potential impacts from light and glare to a less-than-significant level without further mitigation.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan, General Plan EIR and LEMC)

II. AGRICULTURE AND FORESTRY RESOURCES

This section describes the environmental setting for agriculture and forestry resources, as well as applicable regulatory framework, potential impacts associated with implementation of the proposed commercial development project at Rome Hill. The primary sources of data for the information presented below are the local General Plan and an extensive field evaluation of the proposed project site.

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 (FMMP) of the California Resources Agency, to non-agricultural use? (No Impact)

No Impact – In the Executive Summary to the GPEIR, agricultural resource issues were found to be less than significant due to the limited amount of agricultural activity within the City and City's Sphere of Influence. The City has not designated the project site nor zoned this site for agricultural use, as the General Plan and zoning classifications in the project vicinity are primarily industrial, commercial and high density residential. Therefore, given that the City does not identify the project site for agricultural use, and that no Prime Farmland, Unique Farmland or Farmland of Statewide Importance has been identified within the project area, implementation of the proposed project and conversion of the project site to the proposed commercial development will not pose any direct or indirect adverse impact to agricultural resources or values. No mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, FMMP)

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

No Impact - Implementation of the proposed project will not conflict with existing zoning for agricultural use, or a Williamson Act contract. According to the City's GPEIR and the Project Description, the proposed project site is not part of a Williamson Act contract. Please reference the discussion in II(a), above. Based on this information, the proposed project will not conflict with existing zoning for agricultural use, or a Williamson Act contract. No adverse impacts are anticipated and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: 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)*

No Impact – The project site is not located within forest land, timberland or timberland zoned for Timberland Production. Therefore, the proposed project will not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). No adverse impacts to forest land or timberland are anticipated and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan, Zoning Map, Public Resources Code Section 12220[g])

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

No Impact – The project site is not located within forest land and has no commercial forest or timber trees on the property; therefore, the project will not result in the loss of forest land or conversion of forest land to non-forest production use. No adverse impacts are anticipated and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan, Zoning Map, Public Resources Code Section 12220[g])

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)*

No Impact – Please refer to the discussion under the preceding issues above. No agricultural activities have been practiced on the site in recent history. Furthermore, the City has designated and zoned the site for commercial and multi-family uses, which does not permit agricultural uses to be carried out. The uses in the immediate vicinity surrounding the proposed project do not currently support agricultural activities, as they consist of a mix of industrial, commercial, residential and open space uses. Ultimately, the development of this site for the Rome Hill Commercial Project would not involve any other changes that would result in on- or off-site agricultural land converting to a non-agricultural use.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan, Zoning Map, Public Resources Code Section 12220[g])

III. AIR QUALITY

Background

The data for the following air quality evaluation is abstracted from an air quality report titled “Rome Hill Commercial Project Air Quality, Greenhouse Gas, and Energy Impact Study, County of Riverside,” dated 1/28/2025 by MD Acoustics which is provided as Appendix A to this Initial Study. This report is used extensively in the following analysis, and it is provided as Appendix A to this Initial Study. For a discussion of the existing Federal and State air quality Framework and Regulatory Setting please refer to Appendix A, Section 2. This includes local (County and City) goals and policies and California Green Building Standards. Presented in the two tables below are the current Federal and State Ambient Air Quality Standards and Health Impacts for specific air pollutants.

Table III-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards ¹		National Standards ²				
		Concentrations ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷		
Ozone (O3)	1-Hour	0.09 ppm	Ultraviolet Photometry	--	Same as Primary Standard	Ultraviolet Photometry		
	8-Hour	0.070 ppm		0.070 ppm (147 µg/m ³)				
Respirable Particulate Matter (PM10) ⁸	24-Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis		
	Annual Arithmetic Mean	20 µg/m ³		--				
Fine Particulate Matter (PM2.5) ⁸	24-Hour	--	Gravimetric or Beta Attenuation	35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis		
	Annual Arithmetic Mean	12 µg/m ³		12 µg/m ³	15 µg/m ³			
Carbon Monoxide (CO)	1-Hour	20 ppm (23 µg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 µg/m ³)	--	Non-Dispersive Infrared Photometry (NDIR)		
	8-Hour	9.0 ppm (10 µg/m ³)		9 ppm (10 µg/m ³)	--			
	8-Hour (Lake Tahoe)	6 ppm (7 µg/m ³)		--	--			
Nitrogen Dioxide (NO ₂) ⁹	1-Hour	0.18 ppm (339 µg/m ³)	Gas Phase Chemiluminescence	100 ppb (188 µg/m ³)	--	Gas Phase Chemiluminescence		
	Annual Arithmetic Mean	0.030 ppm (357 µg/m ³)		0.053 ppm (100 µg/m ³)	Same as Primary Standard			
Sulfur Dioxide (SO ₂) ¹⁰	1-Hour	0.25 ppm (655 µg/m ³)	Ultraviolet Fluorescence	75 ppb (196 µg/m ³)	--	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)		
	3-Hour	--		--	0.5 ppm (1300 mg/m ³)			
	24-Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (for certain areas) ¹⁰	--			
	Annual Arithmetic Mean	--		0.130ppm (for certain areas) ¹⁰	--			
Lead ^{11,12}	30 Day Average	1.5 µg/m ³	Atomic Absorption	--				
	Calendar Qtr	--		1.5 µg/m ³ (for certain areas) ¹²	Same as Primary Standard	High Volume Sampler and Atomic Absorption		
	Rolling 3-Month Average	--		0.15 µg/m ³				
Visibility Reducing Particles ¹³	8-Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	No National Standards				
Sulfates	24-Hour	25 µg/m ³	Ion Chromatography					
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence					
Vinyl Chloride ¹¹	24-Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography					

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter

(PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 $\mu\text{g}/\text{m}^3$ to 12.0 $\mu\text{g}/\text{m}^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 $\mu\text{g}/\text{m}^3$, as was the annual secondary standard of 15 $\mu\text{g}/\text{m}^3$. The existing 24-hour PM10 standards (primary and secondary) of 150 $\mu\text{g}/\text{m}^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
9. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
10. On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
- Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
11. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
12. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu\text{g}/\text{m}^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
13. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Table III-2
HEALTH EFFECTS OF MAJOR CRITERIA POLLUTANTS

Pollutants	Sources	Primary Effects
Carbon Monoxide (CO)	<ul style="list-style-type: none"> Incomplete combustion of fuels and other carbon-containing substances, such as motor exhaust. Natural events, such as decomposition of organic matter. 	<ul style="list-style-type: none"> Reduced tolerance for exercise. Impairment of mental function. Impairment of fetal development. Death at high levels of exposure. Aggravation of some heart diseases (angina).
Nitrogen Dioxide (NO ₂)	<ul style="list-style-type: none"> Motor vehicle exhaust. High temperature stationary combustion. Atmospheric reactions. 	<ul style="list-style-type: none"> Aggravation of respiratory illness. Reduced visibility. Reduced plant growth. Formation of acid rain.
Ozone (O ₃)	<ul style="list-style-type: none"> Atmospheric reaction of organic gases with nitrogen oxides in sunlight. 	<ul style="list-style-type: none"> Aggravation of respiratory and cardiovascular diseases. Irritation of eyes. Impairment of cardiopulmonary function. Plant leaf injury.
Lead (Pb)	<ul style="list-style-type: none"> Contaminated soil. 	<ul style="list-style-type: none"> Impairment of blood function and nerve construction. Behavioral and hearing problems in children.
Fine Particulate Matter (PM-10)	<ul style="list-style-type: none"> Stationary combustion of solid fuels. Construction activities. Industrial processes. Atmospheric chemical reactions. 	<ul style="list-style-type: none"> Reduced lung function. Aggravation of the effects of gaseous pollutants. Aggravation of respiratory and cardio respiratory diseases. Increased cough and chest discomfort. Soiling. Reduced visibility.

Pollutants	Sources	Primary Effects
Fine Particulate Matter (PM-2.5)	<ul style="list-style-type: none"> • Fuel combustion in motor vehicles, equipment, and industrial sources. • Residential and agricultural burning. • Industrial processes. • Also, formed from photochemical reactions of other pollutants, including NOx, sulfur oxides, and organics. 	<ul style="list-style-type: none"> • Increases respiratory disease. • Lung damage. • Cancer and premature death. • Reduces visibility and results in surface soiling.
Sulfur Dioxide (SO ₂)	<ul style="list-style-type: none"> • Combustion of sulfur-containing fossil fuels. • Smelting of sulfur-bearing metal ores. • Industrial processes. 	<ul style="list-style-type: none"> • Aggravation of respiratory diseases (asthma, emphysema). • Reduced lung function. • Irritation of eyes. • Reduced visibility. • Plant injury. • Deterioration of metals, textiles, leather, finishes, coatings, etc.

Source: California Air Resources Board, 2002.

Several pollutants listed in Table III-1 are not addressed in this analysis. Analysis of lead is not included in this report because the project is not anticipated to emit lead. Visibility-reducing particles are not explicitly addressed in this analysis because particulate matter is addressed. The project is not expected to generate or be exposed to vinyl chloride because the proposed project uses do not utilize the chemical processes that generate this pollutant and there are no such uses in the project vicinity. The proposed project is also not expected to cause exposure to hydrogen sulfide because it would not generate hydrogen sulfide in any substantial quantity.

The project site is located in an unincorporated portion of the County of Riverside within the sphere of influence of the City of Lake Elsinore, which is part of the South Coast Air Basin (SCAB or Basin) that includes all of Orange County as well as the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Basin is located on a coastal plain with connecting broad valleys and low hills to the east. Regionally, the South Coast Air Basin is bounded by the Pacific Ocean to the southwest and high mountains to the east forming the inland perimeter.

Dominant airflows provide the driving mechanism for transport and dispersion of air pollution. The mountains surrounding the region form natural horizontal barriers to the dispersion of air contaminants. Air pollution created in the coastal areas and around the Los Angeles area is transported inland until it reaches the mountains where the combination of mountains and inversion layers generally prevent further dispersion. This poor ventilation results in a gradual degradation of air quality from the coastal areas to inland areas. Air stagnation may occur during the early evening and early morning periods of transition between day and nighttime flows. The region also experiences periods of hot, dry winds from the desert, known as Santa Ana winds. If the Santa Ana winds are strong, they can surpass the sea breeze, which blows from the ocean to the land, and carry the suspended dust and pollutants out to the ocean. If the winds are weak, they are opposed by the sea breeze and cause stagnation, resulting in high pollution events.

Temperature inversions limit the vertical depth through which pollution can be mixed. Among the most common temperature inversions in the basin are radiation inversions, which form on clear winter nights when cold air off mountains sink to the valley floor while the air aloft over the valley remains warm. These inversions, in conjunction with calm winds, trap pollutants near the source. Other types of temperature inversions that affect the basin include marine, subsidence, and high-pressure inversions.

The temperature and precipitation levels for the City of Lake Elsinore show that August is typically the warmest month and December is typically the coolest month. Rainfall in the project area varies considerably in both time and space. Almost all the annual rainfall comes from the fringes of mid-latitude storms from

late November to early April, with summers being almost completely dry.

The South Coast Air Quality Management District (SCAQMD) has divided the South Coast Air Basin into 38 air-monitoring areas with a designated ambient air monitoring station representative of each area. The project site is located in the City of Lake Elsinore (Area 25). The nearest air monitoring station to the project site is the Lake Elsinore – W Flint Street Station (Lake Elsinore Station). The Lake Elsinore Station is located approximately 1.6 miles southeast of the project site, at 506 W Flint Street, Lake Elsinore; however, this location does not provide all ambient weather data. Therefore, additional data was pulled from the SCAQMD historical data for the Lake Elsinore Area (Area 25) for both sulfur dioxide and carbon monoxide to provide the existing levels. Table III-3 presents the monitored pollutant levels within the vicinity. However, it should be noted that due to the air monitoring station distance from the project site, recorded air pollution levels at the air monitoring station reflect with varying degrees of accuracy, local air quality conditions at the project site. The monitoring data presented in Table III-3 shows that ozone and particulate matter (PM10) are the air pollutants of primary concern in the project area.

Table III-3
LOCAL AREA AIR QUALITY LEVELS FROM THE LAKE ELSINORE MONITORING STATIONS

Pollutant (Standard)²	Year		
	2021	2022	2023
Ozone:			
Maximum 1-Hour Concentration (ppm)	0.118	0.121	0.120
Days > CAAQS (0.09 ppm)	18	17	10
Maximum 8-Hour Concentration (ppm)	0.097	0.091	0.103
Days > NAAQS (0.07 ppm)	44	37	31
Days > CAAQS (0.070 ppm)	46	37	35
Carbon Monoxide:			
Maximum 1-Hour Concentration (ppm)	-	-	-
Days > NAAQS (20 ppm)	-	-	-
Maximum 8-Hour Concentration (ppm)	-	-	-
Days > NAAQS (9 ppm)	-	-	-
Nitrogen Dioxide:			
Maximum 1-Hour Concentration (ppm)	0.044	0.037	0.042
Days > NAAQS (0.25 ppm)	0	0	0
Sulfur Dioxide:			
Maximum 1-Hour Concentration (ppm)	-	-	-
Days > CAAQS (0.25 ppm)	-	-	-
Inhalable Particulates (PM10):			
Maximum 24-Hour Concentration (ug/m ³)	90.0	91.8	187.0
Days > NAAQS (150 ug/m ³)	0	0	1
Days > CAAQS (50 ug/m ³)	*	*	*
Annual Average (ug/m ³)	22.4	20.3	21.8
Annual > NAAQS (50 ug/m ³)	No	No	No
Annual > CAAQS (20 ug/m ³)	Yes	Yes	Yes
Ultra-Fine Particulates (PM2.5):			
Maximum 24-Hour Concentration (ug/m ³)	28.3	16.2	19.9
Days > NAAQS (35 ug/m ³)	*	*	*
Annual Average (ug/m ³)	6.9	5.8	5.9
Annual > NAAQS (15 ug/m ³)	No	No	No
Annual > CAAQS (12 ug/m ³)	No	No	No
¹ . Source: obtained from https://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year and /or https://www.arb.ca.gov/adam/topfour/topfour1.php			
² CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard; ppm = parts per million			
³ No data available.			

The Federal Environmental Protection Agency (EPA) and the California Air Resources Control Board (CARB) designate air basins where ambient air quality standards are exceeded as “nonattainment” areas. If standards are met, the area is designated as an “attainment” area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered “unclassified.” National nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards. Each standard has a different definition, or ‘form’ of what constitutes attainment, based on specific air quality statistics. For example, the Federal 8-hour CO standard is not to be exceeded more than once per year; therefore, an area is in attainment of the CO standard if no more than one 8-hour ambient air monitoring values exceeds the threshold per year. In contrast, the federal annual PM2.5 standard is met if the three-year average of the annual average PM2.5 concentration is less than or equal to the standard. Table III-4 lists the attainment status for the criteria pollutants in the basin.

The EPA and the CARB designate air basins where ambient air quality standards are exceeded as “nonattainment” areas. If standards are met, the area is designated as an “attainment” area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered “unclassified.” National nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards. Each standard has a different definition, or ‘form’ of what constitutes attainment, based on specific air quality statistics. For example, the Federal 8-hour CO standard is not to be exceeded more than once per year; therefore, an area is in attainment of the CO standard if no more than one 8-hour ambient air monitoring values exceeds the threshold per year. In contrast, the federal annual PM2.5 standard is met if the three-year average of the annual average PM2.5 concentration is less than or equal to the standard. Table III-4 lists the attainment status for the criteria pollutants in the basin.

Table III-4
SOUTH COAST AIR BASIN ATTAINMENT STATUS

Pollutant	Averaging Time	National Standards ¹	Attainment Date ²	California Standards ³
1979 1-Hour Ozone ⁴	1-Hour (0.12 ppm)	Nonattainment (Extreme)	11/15/2010 (Not attained ⁴)	Extreme Nonattainment
1997 8-Hour Ozone ⁵	8-Hour (0.08 ppm)	Nonattainment (Extreme)	6/15/2024	Nonattainment
2008 8-Hour Ozone	8-Hour (0.075 ppm)	Nonattainment (Extreme)	12/31/2032	
2015 8-Hour Ozone	8-Hour (0.070 ppm)	Designations Pending	~2037	
CO	1-Hour (35 ppm) 8-Hour (9 ppm)	Attainment (Maintenance)	6/11/2007 (Attained)	Maintenance
NO ₂ ⁶	1-Hour (100 ppb) Annual (0.053 ppm)	Attainment (Maintenance)	9/22/1998 (Attained)	Attainment
SO ₂ ⁷	1-Hour (75 ppb)	Designations Pending	Pending	Attainment
	24-Hour (0.14 ppm) Annual (0.03 ppm)	Unclassifiable/ Attainment	3/19/1979 (Attained)	
PM10	24-Hour (150 µg/m ³)	Nonattainment (Serious) ⁸	12/31/2006 (Redesignation request submitted) ⁸	Nonattainment
PM2.5	24-Hour (35 µg/m ³)	Nonattainment	12/31/2006 (Redesignation request submitted) ⁸	Unclassified
Lead	3-Months Rolling (0.15 µg/m ³)	Nonattainment (Partial) ⁹	12/31/2015	Nonattainment (Partial) ⁹

Notes:

¹ Obtained from Draft 2012 AQMP, SCAQMD, 2012. EPA often only declares Nonattainment areas; everywhere else is listed as Unclassified/Attainment or Unclassifiable.

² A design value below the NAAQS for data through the full year or smog season prior to the attainment date is typically required for attainment demonstration.

³ Obtained from <http://www.arb.ca.gov/design/adm.htm>.

⁴ 1-hour O₃ standard (0.13 ppm) was revoked, effective June 15, 2005; however, the Basin has not attained this standard based on 2008-2010 data has some continuing obligations under the former standard.

⁵ 1997 8-hour O₃ standard (0.08 ppm) was reduced (0.075 ppm), effective May 27, 2008; the 1997 O₃ standard and most related implementation rules remain in place until the 1997 standard is revoked by U.S. EPA.

⁶ New NO₂ 1-hour standard, effective August 2, 2010; attainment designations June, 2013; annual NO₂ standard retained.

⁷ The 1971 annual and 24-hour SO₂ standards were revoked, effective August 23, 2010; however, these 1971 standards will remain in effect until one year after U.S. EPA promulgates area designations for the 2010 SO₂ 1-hour standard. Area designations expected in 2012, with SSAB designated Unclassifiable/Attainment.

⁸ Annual PM10 standard was revoked, effective December 18, 2006; redesignation request to Attainment of the 24-hour PM10 standard is pending with U.S. EPA

⁹ Partial Nonattainment designation - Los Angeles County portion of Basin only.

Please refer to Section 4 of Appendix A for detailed information regarding Modeling Parameters and Assumptions.

Impact Analysis

The CEQA Guidelines define a significant effect on the environment as “a substantial, or potentially substantial, adverse change in the environment.” To determine if a project would have a significant impact on air quality, the type, level, and impact of emissions generated by the project must be evaluated. The following air quality significance thresholds are contained in Appendix G of the CEQA Guidelines. A significant impact would occur if the project would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable national or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutant concentrations; or
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

While the final determination of whether a project is significant is within the purview of the Lead Agency pursuant to Section 15064(b) of the CEQA Guidelines, SCAQMD recommends that its quantitative air pollution thresholds be used to determine the significance of project emissions. If the Lead Agency finds that the project has the potential to exceed these air pollution thresholds, the project should be considered to have significant air quality impacts. There are daily emission thresholds for construction and operation of a proposed project in the basin.

The following CEQA significance thresholds for construction emissions are established for the South Coast Air Basin:

- 75 pounds per day (lbs/day) of VOC
- 100 lbs/day of NOx
- 550 lbs/day of CO
- 150 lbs/day of PM10
- 55 lbs/day of PM2.5
- 150 lbs/day of SO2

Projects in the South Coast Air Basin with construction-related emissions that exceed any of the emission thresholds are considered to be significant under SCAQMD guidelines.

The daily operational emissions significance thresholds for the basin are as follows:

- 55 pounds per day (lbs/day) of VOC
- 55 lbs/day of NOx
- 550 lbs/day of CO
- 150 lbs/day of PM10
- 55 lbs/day of PM2.5
- 150 lbs/day of SO2

The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project are above or below State and federal CO standards. If ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a State or federal standard, project emissions are considered significant if they increase 1-hour CO concentrations by 1.0 ppm or more or 8-hour CO concentrations by 0.45 ppm or more. The following are applicable local emission concentration

standards for CO:

- California State 1-hour CO standard of 20.0 ppm
- California State 8-hour CO standard of 9.0 ppm

Project-related construction air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the South Coast Air Basin. In order to assess local air quality impacts the SCAQMD has developed Localized Significant Thresholds (LSTs) to assess the project-related air emissions in the project vicinity. The SCAQMD has also provided Final Localized Significant Threshold Methodology (LST Methodology), June 2003, which details the methodology to analyze local air emission impacts. The Localized Significant Threshold Methodology found that the primary emissions of concern are NO₂, CO, PM10, and PM2.5. The emission thresholds were calculated based on the Elsinore source receptor area (SRA 25) and a disturbance of 2 acres per day, to be conservative, at a distance of 50 meters (164 feet), for construction and 2 acres a day, to be conservative, for screening of localized operational emissions.

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 Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies of the proposed project with the AQMP.

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the proposed project would interfere with the region's ability to comply with Federal and State air quality standards. If the decision-makers determine that the proposed project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency. 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 should be considered to 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 will 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 will exceed the assumptions in the AQMP in 2016 or increments based on the year of project buildout and phase.

These criteria are evaluated in the following text.

Based on the air quality modeling analysis contained in Appendix A of this document, short-term construction impacts will not result in significant impacts based on the SCAQMD regional and local thresholds of significance. Appendix A also found that, long-term operations impacts will not result in significant impacts based on the SCAQMD local and regional thresholds of significance. Refer to Table III-5 and III-7 for the summary of emissions compared to the thresholds. Therefore, the proposed project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP for the first criterion.

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed project are based on the same forecasts as the AQMP. The 2016-2040 Regional Transportation/Sustainable Communities Strategy, prepared by SCAG, 2016, includes chapters on: the challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These chapters currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA. For this project, the County of Riverside and City of Lake Elsinore Land Use Plans define the assumptions that are represented in the AQMP.

Mitigation Measures: None required.

(Sources: Air Quality and GHG Analysis Report, 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 latest version of CalEEMod was used to estimate the onsite and offsite construction emissions. The emissions incorporate Rule 402 and 403. Rule 402 and 403 (fugitive dust and odors) are not considered mitigation measures as the project by default is required to incorporate these rules during construction. The construction emissions for the project would not exceed the SCAQMD's daily emission thresholds at the regional level as demonstrated in Table III-5, and therefore would be considered less than significant.

**Table III-5
REGIONAL SIGNIFICANCE - CONSTRUCTION EMISSIONS (POUNDS/DAY)**

Activity	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO2	PM10	PM2.5
SITE PREPARATION:						
On-Site ²	3.31	31.60	30.20	0.05	9.04	5.20
Off-Site ³	0.08	0.08	1.35	0.00	0.23	0.05
Total	3.39	31.68	31.55	0.05	9.27	5.25
GRADING:						
On-Site ²	1.74	16.30	17.90	0.03	3.49	2.00
Off-Site ³	0.14	4.85	2.33	0.03	1.41	0.45
Total	1.88	21.15	20.23	0.06	4.90	2.45
BUILDING CONSTRUCTION:						
On-Site ²	1.13	10.40	13.00	0.02	0.43	0.40
Off-Site ³	0.24	0.95	4.15	0.00	0.85	0.22
Total	1.37	11.35	17.15	0.02	1.28	0.62
Paving						
On-Site ²	1.28	7.12	9.94	0.01	0.32	0.29
Off-Site ³	0.06	0.22	1.13	0.00	0.25	0.06
Total	1.34	7.34	11.07	0.01	0.57	0.35
ARCHITECTURAL COATING:						
On-Site ²	58.82	0.86	1.13	0.00	0.02	0.02
Off-Site ³	0.04	0.04	0.73	0.00	0.13	0.03
Total	58.86	0.90	1.86	0.00	0.15	0.05
Total of overlapping phases⁴	61.57	19.59	30.08	0.03	2.00	1.02
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

Notes: 1 Source: CalEEMod Version 2022.1.1.29

2 On-site emissions from equipment operated on-site that is not operated on public roads.

3 Off-site emissions from equipment operated on public roads.

4 Construction, architectural coatings and paving phases may overlap.

The data provided in Table III-6 shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors. Therefore, a less than significant local air quality impact would occur from construction of the proposed project.

**Table III-6
LOCALIZED SIGNIFICANCE – CONSTRUCTION**

Activity	Pollutant Emissions (pounds/day) ¹			
	NOx	CO	PM10	PM2.5
Site Preparation	31.60	30.20	9.04	5.20
Grading	16.30	17.90	3.49	2.00
Building Construction	10.40	13.00	0.43	0.40
Paving	7.12	9.94	0.32	0.29
Architectural Coating	0.86	1.13	0.02	0.02
Total of overlapping phases	18.38	24.07	0.77	0.71
SCAQMD Threshold for 50 meters (164 feet) or less²	275	1,572	20	6
Exceeds Threshold?	No	No	No	No

Notes: 1 Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for two acres, to be conservative, in Perris Valley Source Receptor Area

(SRA 24). Project will disturb a maximum of 4.0 acres per day (see Table 7).

2 The nearest sensitive receptor is located 56 meters southeast; therefore, the 50-meter threshold has been used.

The operations-related criteria air quality impacts created by the proposed project have also been analyzed through the use of CalEEMod model. The operating emissions were based on year 2025, which is the anticipated opening year for the project per the project applicant. The summer and winter emissions created by the proposed project's long-term operations were calculated and the highest emissions from either summer or winter are summarized in Table III-7.

Table III-7 provides the project's unmitigated operational emissions. Table III-7 shows that the project does not exceed the SCAQMD daily emission threshold and regional operational emissions are considered to be less than significant.

**Table III-7
REGIONAL SIGNIFICANCE – UNMITIGATED OPERATIONAL EMISSIONS (POUNDS PER DAY)**

Activity	Pollutant Emissions (pounds/day) ¹					
	VOC	NOx	CO	SO2	PM10	PM2.5
Area Sources ²	3.80	0.04	5.28	0.00	0.01	0.01
Energy Usage ³	0.03	0.62	0.52	0.00	0.05	0.05
Mobile Sources ⁴	1.00	4.40	12.60	0.06	3.45	0.94
Total Emissions	4.83	5.06	18.40	0.06	3.51	1.00
SCAQMD Thresholds	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Notes: 1 Source: CalEEMod Version 2022.1.1.29

2 Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

3 Energy usage consists of emissions from on-site natural gas usage.

4 Mobile sources consist of emissions from vehicles and road dust.

Table III-8 shows the calculated emissions for the proposed operational activities compared with

appropriate LSTs. The LST analysis only includes on-site sources; however, the CalEEMod software outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions shown in Table III-8 include all on-site project-related stationary sources and 10% of the project-related new mobile sources. This percentage is an estimate of the amount of project-related new vehicle traffic that will occur on-site. Table III-8 indicates that the local operational emission would not exceed the LST thresholds at the nearest sensitive receptors, located adjacent to the project. Therefore, the project will not result in significant Localized Operational emissions.

Table III-8
Localized Significance – Unmitigated Operational Emissions

Activity	Pollutant Emissions (pounds/day) ¹			
	NOx	CO	PM10	PM2.5
Area Sources ²	0.04	5.28	0.01	0.01
Energy Usage ³	0.62	0.52	0.05	0.05
On-Site Vehicle Emissions ⁴	0.44	1.26	0.35	0.09
Total Emissions	1.10	7.06	0.41	0.15
SCAQMD Threshold for 50 meters (164 feet)⁵	275	1,572	5	2
Exceeds Threshold?	No	No	No	No

Notes:

1 Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for two acres, to be conservative, in Lake Elsinore Source Receptor Area (SRA 25).

2 Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

3 Energy usage consists of emissions from generation of electricity and on-site natural gas usage.

4 On-site vehicular emissions based on 1/10 of the gross vehicular emissions and road dust.

5 The nearest sensitive receptor is located 56 meters southeast; therefore, the 50-meter threshold has been used.

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 well out of 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 project's air quality must be generic by nature.

The project area is out of attainment for both ozone and PM10 particulate matter. Construction and operation of cumulative projects will further degrade the local air quality, as well as the air quality of the South Coast Air Basin. The greatest cumulative impact on the quality of regional air cell will be the incremental addition of pollutants mainly from increased traffic from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of these projects. Air quality will be temporarily degraded during construction activities that occur separately or simultaneously. However, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not considered significant (cumulatively considerable) and do not add to the overall cumulative impact. The project does not exceed any of the thresholds of significance and therefore is considered less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: Air Quality and GHG Analysis Report, and Appendix A of this IS/MND)

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

Please refer to the analysis under issue b. which includes the findings regarding Local Significance Thresholds (LSTs). LST impacts were determined to be less than significant based on the detailed analysis in the Appendix A and the model results summarized in Tables III-6 and III-8 above.

During construction the greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project. The Office of Environmental Health Hazard Assessment (OEHHA) has issued the Air Toxic Hot Spots Program Risk Assessment Guidelines and Guidance Manual for the Preparation of Health Risk Assessments, February 2015 to provide a description of the algorithms, recommended exposure variates, cancer and noncancer health values, and the air modeling protocols needed to perform a health risk assessment (HRA) under the Air Toxics Hot Spots Information and Assessment Act of 1987. Hazard identification includes identifying all substances that are evaluated for cancer risk and/or non-cancer acute, 8-hour, and chronic health impacts. In addition, identifying any multi-pathway substances that present a cancer risk or chronic non-cancer hazard via non-inhalation routes of exposure.

Given the relatively limited number of heavy-duty construction equipment and construction schedule, the proposed project would not result in a long-term substantial source of toxic air containment emissions and corresponding individual cancer risk. Furthermore, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed project.

Carbon Monoxide (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 which were presented in above in Section 5.0.

To determine if the proposed project could cause emission levels in excess of the CO standards discussed above in Section 5.0, a sensitivity analysis is typically conducted to determine the potential for CO “hot spots” at a number of intersections in the general project vicinity. Because of reduced speeds and vehicle queuing, “hot spots” potentially can occur at high traffic volume intersections with a Level of Service E or worse.

Micro-scale air quality emissions have traditionally been analyzed in environmental documents where the air basin was a non-attainment area for CO. However, the SCAQMD has demonstrated in the CO attainment redesignation request to EPA that there are no “hot spots” anywhere in the air basin, even at intersections with much higher volumes, much worse congestion, and much higher background CO levels than anywhere in Riverside County. If the worst-case intersections in the air basin have no “hot spot” potential, any local impacts will be below thresholds.

The traffic impact analysis showed that the project would generate 184 trips per day. The 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan) showed that an intersection which has a daily traffic volume of approximately 100,000 vehicles per day would not violate the CO standard. The volume of traffic at project buildout would be well below 100,000 vehicles and below the necessary volume to even get close to causing a violation of the CO standard. Therefore, no CO “hot spot” modeling was performed and no significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed project.

Mitigation Measures: No mitigation measures are required.

(Sources: Air Quality and GHG Analysis Report (Appendix A), CARB Air Quality and Land Use Handbook [CARB 2005])

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

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are of short-term in nature and the odor emissions are expected cease upon the drying or hardening of the odor producing materials. Diesel exhaust and VOCs would be emitted during construction of the project, which are objectionable to some; however, emissions would disperse rapidly from the project site and therefore should not reach an objectionable level at the nearest sensitive receptors. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the proposed project.

The SCAQMD recommends that odor impacts be addressed in a qualitative manner. Such an analysis shall determine whether the project would result in excessive nuisance odors, as defined under the California Code of Regulations and Section 41700 of the California Health and Safety Code, and thus would constitute a public nuisance related to air quality. Potential sources that may emit odors during the on-going operations of the proposed project would include odor emissions from the trash storage areas. Due to the substantial distance of the nearest sensitive receptors from the project site and through compliance with SCAQMD's Rule 402, no significant impact related to odors would occur during the on-going operations of the proposed project.

Mitigation Measures: No mitigation measures are required.

(Sources: Air Quality and GHG Analysis Report, CARB Air Quality and Land Use Handbook [CARB 2005])

IV. BIOLOGICAL RESOURCES

The data for the following biological resources evaluation is abstracted from a General Biological Assessment titled "General Biological Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis for Assessor's Parcel Numbers 371-150-001 and 371-150-002, City of Lake Elsinore-County of Riverside," published 12/2021 by Hernandez Environmental Services. This Assessment is used extensively in the following analysis, and it is provided as Appendix B to this Initial Study.

A Joint Project Review (JPR) was completed by the Western Riverside County Regional Conservation Authority (RCA) to determine consistency with the MSHCP and identify potential impacts to biological resources associated with the development of the proposed project (Appendix B – Joint Project Review [JPR 22-03-11-01] for the LEAP 2022-02/Rome Hill Commercial, RCA, August 19, 2022).

The U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) provided comments on the JPR as they relate to the project's consistency with MSHCP Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface) (Appendix B – Review of the Joint Project Review [JPR 22-03-11-01] for the LEAP 2022-02/Rome Hill Commercial, provided by U.S. Fish and Wildlife Service and California Department of Fish and Wildlife, September 14, 2022).

- 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? (No Impact)*

Based on the site biological survey conducted by Hernandez Environmental Services, no evidence of any sensitive species was identified during the site survey. Thus, the finding under this issue is that the implementation of the proposed project will have no impact on any sensitive species and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Source: A general biological resources assessment has been prepared for the Rome Hill Commercial Project site, refer to Appendix B).

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? (No Impact)*

Based on the site biological survey conducted by Hernandez Environmental Services, no evidence of any riparian habitat or any other sensitive natural community was identified during the site survey. The development of the proposed project will impact the entire 6.77-acre project site, including approximately 6.72 acres of disturbed areas and 0.05 acre of tamarisk dominant habitat. Thus, the finding under this issue is that the implementation of the proposed project will have no impact on any sensitive habitat or natural community and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Source: A general biological resources assessment has been prepared for the Rome Hill Commercial Project site, refer to Appendix B).

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)*

Based on the site biological survey conducted by Hernandez Environmental Services, no evidence of any protected wetlands of any kind were identified during the site survey. The project site does not contain any State or Federal drainages. Further, the project area does not contain any wetlands or vernal pools. Thus, the finding under this issue is that the implementation of the proposed project will have no impact on any wetland habitat and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Source: A general biological resources assessment has been prepared for the Rome Hill Commercial Project site, refer to Appendix B).

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)*

Given the results of the biological survey, the proposed project does not appear to support wildlife movement. The proposed project is bound by surrounding development and roadways and Lake Elsinore. Most native bird species are protected from unlawful take by the Migratory Bird Treaty Act (MBTA). The State of California provides protection for native bird species and their nests in the Fish and Game Code (FGC). When development proceeds, the project site is unlikely to contain nesting birds because all trees have been removed from the site following a nesting bird clearance survey. Thus, nesting birds are not

likely to be adversely impacted. Given that no suitable habitat for nesting birds has been identified within the project site, impacts thereof would be less than significant.

Thus, any effects on wildlife movement or the use of wildlife nursery sites will be less than significant impact.

Mitigation Measures: None required.

(Source: A general biological resources assessment has been prepared for the Rome Hill Commercial Project site, refer to Appendix B).

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (No Impact)

According to the Biological Assessment the project site contains mainly invasive species with the possibility of a few non-native trees. Thus, based on this current study, the project site does not contain any trees or other locally protected biological resources. Thus, based on this current study, implementation of the proposed project will have no impact under this issue. No mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Source: A general biological resources assessment has been prepared for the Rome Hill Commercial Project site, refer to Appendix B).

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 Western Riverside County MSHCP is a comprehensive, multi-jurisdictional effort that includes unincorporated County of Riverside lands and multiple cities in the western portion of the County, including the City. Rather than address sensitive species on an individual basis, the MSHCP focuses on the conservation of 146 species, proposing a reserve system of approximately 500,000 acres and a mechanism to fund and implement the reserve system (County 2003). The MSHCP allows participating entities to issue take permits for listed species so that individual applicants need not seek their own permits from USFWS and/or CDFW. The MSHCP was adopted on June 17, 2003 by the County Board of Supervisors. The Incidental Take Permit was issued by both the USFWS and CDFW on June 22, 2004.

Pursuant to the provisions of the MSHCP, all discretionary development projects within a Criteria Area are to be reviewed for compliance with the “Property Owner Initiated Habitat Evaluation and Acquisition Negotiation Strategy” (LEAP) process or equivalent process. The LEAP process “ensures that an early determination will be made of what properties are needed for the MSHCP Conservation Area, that the owners of property needed for the MSHCP Conservation Area are compensated, and that owners of land not needed for the MSHCP Conservation Area shall receive Take Authorization of Covered Species Adequately Conserved through the Permits issued to the County and Cities pursuant to the MSHCP.” A formal and complete LEAP application (LEAP 2022-02) was submitted to the City on January 12, 2022 and a JPR (22-03-11-01) was completed by the RCA on August 19, 2022. Concurrence from CDFW and USFWS (collectively, the Wildlife Agencies) was received on September 14, 2022.

A portion of the project impact footprint (approximately 4.28 acres) occurs within Criteria Cell 5038, which is in the MSHCP Elsinore Area Plan, Subunit 3 (Elsinore). The project site is located within the southern portion of Criteria Cell 5038. Conservation within this Cell is intended to contribute to the assembly of

Proposed Extension of Existing Core 3. Conservation within this Criteria Cell 5038 focuses on grassland habitat. Areas conserved within this Cell should be connected to grassland habitat proposed for conservation in Criteria Cell 5036 to the east. Conservation within this Cell will range from 35 to 45 percent of the Cell focusing on the eastern central portion of the Cell. The project site consists of disturbed habitat with scattered ornamental trees and a small patch of tamarisk dominant habitat within the northwestern corner of the site. The project site does not contain the grassland habitat sought for conservation in Criteria Cell 5036. Further, the site is not located within the eastern central portion of Criteria Cell 5038, which would provide a connection to Criteria Cell 5036 to the east. Therefore, conservation of the project site would not contribute to the conservation goals of the Criteria Cell due to the absence of grassland habitat with connectivity to grassland habitat within Criteria Cell 5036 to the east.

Regarding other MSHCP issues, the following findings were made in the General Biological Assessment: no riparian/riverine habitat occurs within the project site; no vernal pool habitat occurs within the project site; and no suitable habitat for the plant species of special concern were found on the project site.

MSHCP Existing Core E (Lake Elsinore) is located to the north of the project site. Therefore, Urban/Wildlands Interface Guidelines (Section 6.14 of the MSHCP) are required to be applied to the project. The following mitigation measures shall be incorporated into the project to reduce potentially significant impacts to the offsite conservation area:

BIO-1 The following measures shall be implemented to reduce potential adverse impacts to adjacent important biological resources.

Drainage

Water Quality Best Management Practices (BMPs) shall be incorporated, including the National Pollutant Discharge Elimination Systems (NPDES) and erosion control requirements from the Regional Water Quality Control Board to ensure that the quantity and quality of surface water runoff discharged offsite is not altered in an adverse way when compared with existing conditions. These BMPs will be implemented as part of the Storm Water Pollution Prevention Plan (SWPPP) in order to ensure that water quality is not degraded.

Toxics

Measures such as those employed to address drainage issues will be implemented for toxics. Land uses proposed in proximity to Lake Elsinore that use chemicals or generate bioproducts that are potentially toxic or may adversely affect wildlife species, habitat or water quality must incorporate measures to ensure that application of such chemicals does not result in discharge to the lake.

Lighting

Night lighting shall be directed away from Lake Elsinore to protect species from direct night lighting. Shielding shall be incorporated in Project designs to ensure ambient lighting adjacent to the lake is not increased.

Noise

Proposed noise generating land uses affecting Lake Elsinore shall incorporate setbacks, berms or walls to minimize the effects of noise on resources pursuant to applicable rules, regulations and guidelines related to land use noise standards. For planning purposes, wildlife within the lake should not be subject to noise that would exceed residential noise standards.

Invasives

Invasive, non-native plant species must not be used as landscaping materials for development

that is proposed adjacent to Lake Elsinore. Table 6-2 of Volume 1 of the MSHCP lists the plants that should be avoided.

The project site is continually disturbed by the use of motor vehicles on site and the storage of large materials. No suitable habitat for the plant species listed above is present on site. In addition, the site is not located within the Western Riverside County MSHCP Additional survey areas for amphibians, survey areas for mammals, or any special linkage areas; however, the site is located within the Western Riverside County MSHCP burrowing owl survey area.

A habitat assessment conducted for this species found that the project site is continually disturbed and that no suitable habitat is present due to the lack of small mammal burrows and manmade structures that could be utilized as burrows, such as earthen berms; cement, asphalt, rock, or wood debris piles; or openings beneath cement or asphalt pavement. Therefore, it has been determined that burrowing owl are not currently present on the project site. However, due to the fact that the project site is located within the Western Riverside County MSHCP burrowing owl survey area, a 3-day preconstruction survey is required prior to the commencement of project activities (e.g. vegetation clearing, clearing and grubbing, tree removal, site watering) to ensure that no owls have colonized the site in the days or weeks preceding project activities.

BIO-2 A habitat assessment has determined that the site does not provide suitable habitat for burrowing owl.

- *However, due to the fact that the project site is located within the Western Riverside County MSHCP burrowing owl survey area, a 3-day preconstruction survey is required prior to the commencement of ground disturbing activities (e.g. vegetation clearing, clearing and grubbing, tree removal, site watering) to ensure that no owls have colonized the site in the days or weeks preceding project activities.*
- *If Burrowing Owl are found to have colonized the project site prior to the initiation of construction, the project proponent will immediately inform RCA and the Wildlife Agencies and will need to prepare a Burrowing Owl Protection and Relocation Plan for approval by RCA and the Wildlife Agencies prior to initiating ground disturbance.*
- *If ground-disturbing activities occur but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrow owl is found, the same coordination described above will be necessary.*

Mitigation Measures: Two mitigation measures, **BIO-1** and **BIO-2**, will be implemented under this issue.

(Source: A general biological resources assessment has been prepared for the Rome Hill Commercial Project site, refer to Appendix B).

V. CULTURAL RESOURCES

The data for the following cultural resources evaluation is abstracted from an updated Cultural Resources Assessment titled “Update to Phase 1 Cultural Resources Assessment Rome Hill Commercial Development Project (APNs 371-150-001 and -002) City of Lake Elsinore, Riverside County, California,” dated May 20, 2022 by CRM TECH. This Assessment is used extensively in the following analysis, and it is provided as Appendix C to this Initial Study. Regarding Tribal Cultural Resources (TCR) and AB52/SB18 issues, please refer to the discussion in this Initial Study under Section XVIII.

- 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)*

Less Than Significant With Mitigation Incorporated – The historical and archaeological resources report provided as Appendix C summarizes the findings of a previous cultural resources and an updated field survey that was completed for this Project. The cultural resources report concluded that there are no surface cultural resources within the site, and as such no further cultural resources evaluation is required for this project. However, as stated in Appendix C, contingency mitigation is recommended to allow the possibility of salvaging subsurface resources accidentally discovered during site disturbance. As such, the following mitigation measure shall be implemented. Refer to the discussion under Tribal Cultural Resources, Section XVIII of this Initial Study.

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. Consulting Tribes(s) refers to Pechanga Band of Indians and Soboba Band of Luiseño Indians.*
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.*
5. *Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Treatment and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of cultural resources through project design, in-place preservation of cultural resources located in native soils, and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Location measure.*
6. *If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Consulting Tribe(s), and shall be submitted to the City for their review and approval prior to implementation of the said plan.*
7. *Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the Project Applicant and the Consulting Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the Community Development Director for decision. The Community Development Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Consulting Tribe(s). Notwithstanding any other rights available under the law, the decision of the City*

Community Development Director shall be appealable to the City Planning Commission and/or City Council." Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to City of Lake Elsinore upon the completion of a treatment plan and final report detailing the significance and treatment finding.

With implementation of measure **CUL-1** impacts to any accidentally exposed cultural resources can be reduced to a less than significant impact.

Mitigation Measure: see **CUL-1** above.

(Sources: The preceding information was abstracted from the findings in Appendix C.)

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 findings above regarding historical resources also applies to archaeological resources. With implementation of measure **CUL-1 through CUL-5** potential impacts to all cultural resources will be reduced to a less than significant impact.

CUL-2: Archaeologist/CRMP. *Prior to issuance of grading permits, the applicant/developer shall provide evidence to the Community Development Department that a Secretary of Interior Standards qualified and certified Registered Professional Archaeologist (RPA) has been contracted to implement a Cultural Resource Monitoring Program (CRMP) that addresses the details of all activities that must be completed and procedures that must be followed regarding cultural resources associated with this project. The CRMP document shall be provided to the Community Development Director or their designee for review and approval prior to issuance of the grading permit. The CRMP provides procedures to be followed and are to ensure that impacts on cultural resources will not occur without procedures that would reduce the impacts to less than significant. These measures shall include, but shall not be limited to, the following:*

Archaeological Monitor - *An adequate number of qualified monitors shall be present to ensure that all earth-moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist, in consultation with the Tribal monitor.*

Cultural Sensitivity Training - *The Project Archaeologist and a representative designated by the consulting Tribe(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all Construction Personnel. Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event unanticipated cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. This is a mandatory training and all construction personnel must attend prior to beginning work on the project site. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.*

Unanticipated Resources - *In the event that previously unidentified potentially significant cultural resources are discovered, the Archaeological and/or Tribal Monitor(s) shall have the*

authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The Project Archaeologist, in consultation with the Tribal monitor(s) shall determine the significance of the discovered resources. The Community Development Director or their designee must concur with the evaluation before construction activities will be allowed to resume in the affected area. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods

Phase IV Report - *A final archaeological report shall be prepared by the Project archaeologist and submitted to the Community Development Director or their designee prior to grading final. The report shall follow County of Riverside requirements and shall include at a minimum: a discussion of the monitoring methods and techniques used; the results of the monitoring program including any artifacts recovered; an inventory of any resources recovered; updated DPR forms for all sites affected by the development; final disposition of the resources including GPS data; artifact catalog and any additional recommendations. A final copy shall be submitted to the City, Project Applicant, the Eastern Information Center (EIC), and the Tribe.*

CUL-3: Cultural Resources Disposition. *In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:*

One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the Community Development Department:

1. *Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.*
2. *Relocation of the resources on the Project property. The measures for relocation shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts by means of a deed restriction or other form of protection (e.g., conservation easement) in order to demonstrate avoidance in perpetuity.*
3. *Relocation shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the City under a confidential cover and not subject to Public Records Request.*
4. *If preservation in place or reburial is not feasible then the resources shall be curated in the culturally sensitive matter at a Riverside County curation facility that meets State Resources Department of Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the City. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV monitoring report. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found,*

shall be provided to the City of Lake Elsinore upon completion of a treatment plan and final report detailing the significance and treatment of finding.

CUL-4: Tribal Monitoring. *Prior to the issuance of a grading permit, at least 30 days prior to the issuance, the applicant shall contact the consulting Native American Tribe(s) that have requested monitoring through consultation with the City during the AB 52 and/or the SB 18 process (“Monitoring Tribes”). The applicant shall coordinate with the Tribe(s) (Pechanga Band of Indians and Soboba Band of Luiseño Indians) to develop individual Tribal Monitoring Agreement(s). A copy of the signed agreement(s) shall be provided to the City of Lake Elsinore Community Development Department, Planning Division prior to the issuance of a grading permit. The Agreement shall address the treatment of any known tribal cultural resources (TCRs) including the project’s approved mitigation measures and conditions of approval; the designation, responsibilities, and participation of professional Tribal Monitors during grading, excavation and ground disturbing activities; project grading and development scheduling; terms of compensation for the monitors; and treatment and final disposition of any cultural resources, sacred sites, and human remains/burial goods discovered on the site per the Tribe(s) (Pechanga Band of Indians and Soboba Band of Luiseño Indians) customs and traditions and the City’s mitigation measures/conditions of approval. The Tribal Monitor will have the authority to stop and redirect grading in the immediate area of a find in order to evaluate the find and determine the appropriate next steps, in consultation with the Project archaeologist.*

CUL-5: Phase IV Report. *Upon completion of the implementation phase, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department’s requirements for such reports for all ground disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the County website. The report shall include results of any feature relocation as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting. Once the report is determined to be adequate, two (2) copies shall be submitted to Eastern Information Center (EIC) at the University of California Riverside (UCR) and one (1) copy shall be submitted to the Monitoring Tribes.*

Mitigation Measures: see CUL-1 through CUL-5 above.

(Sources: The preceding information was abstracted from the findings in Appendix C.)

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

As noted in the discussion above, no available information suggests that human remains may occur within the project Area of Potential Effect (APE) and the potential for such an occurrence is considered very low. In the unlikely event that unknown human remains are uncovered during project construction, CUL-6 and CUL-7, pursuant to California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, would ensure that the project’s impacts would be less than significant.

CUL-6: 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.

According to the California Health and Safety Code, six or more human burial at one location constitutes a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052).

CUL-7: Non-Disclosure of Reburial Location. *It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American Tribal Cultural Resources (TCR) shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act.*

Mitigation Measure: see CUL-6 and CUL-7 above.

(Sources: The preceding information was abstracted from the findings in Appendix C and current California statutes)

VI. ENERGY

The data for the following Energy evaluation is abstracted from a report titled “Rome Hill Commercial Project Air Quality, Greenhouse Gas, and Energy Impact Study, County of Riverside,” dated 1/28/2025 by MD Acoustics. This Study is used extensively in the following analysis, and it is provided as Appendix A to this Initial Study.

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)

Construction Energy Demand

Electrical service will be provided by Southern California Edison (SCE). Based on the 2017 National Construction Estimator, Richard Pray (2017), the typical power cost per 1,000 square feet of building construction per month is estimated to be \$2.32. The project plans to develop the site with 121,490 square feet of new warehouse space over the course of approximately 14 months. Based on Table VI-1, the total power cost of the on-site electricity usage during the construction of the proposed project is estimated to be approximately \$3,946. As shown in Table VI-1, the total electricity usage from Project construction related activities is estimated to be approximately 71,745 kWh.

Table VI-1
PROJECT CONSTRUCTION POWER COST AND ELECTRICITY USAGE

Power Cost (per 1,000 square foot of building per month of construction)	Total Building Size (1,000 Square Foot) ¹	Construction Duration (months)	Total Project Construction Power Cost
\$2.32	121.49	14	\$3,946.00
Cost per kWh			Total Project Construction Electricity Usage (kWh)
\$0.06			71,745

* Assumes the project will be under the GS-1 General Service rate under SCE.

Using the CalEEMod data input, the project's construction phase would consume electricity and fossil fuels as a single energy demand, that is, once construction is completed their use would cease. CARB's 2017 Emissions Factors Tables show that on average aggregate fuel consumption (gasoline and diesel fuel) would be approximately 18.5 hp-hr/gal. As presented in Table VI-2 below, project construction activities would consume an estimated 32,015 gallons of diesel fuel.

Table VI-2
CONSTRUCTION EQUIPMENT FUEL CONSUMPTION

Phase	Number of Days	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor	HP hrs/ day	Total Fuel Consumption (gal diesel fuel) ¹
Site Preparation	10	Rubber Tired Dozers	3	8	367	0.4	3523	1904
	10	Tractors/Loaders/Backhoes	4	8	84	0.37	995	538
Grading	30	Excavators	1	8	36	0.38	109	118
	30	Graders	1	8	148	0.41	485	525
	30	Rubber Tired Dozers	1	8	367	0.4	1,174	1,270
	30	Tractors/Loaders/Backhoes	3	8	84	0.37	746	806
Building Construction	300	Cranes	1	7	367	0.29	745	9,262
	300	Forklifts	3	8	82	0.2	394	4,893
	300	Generator Sets	1	8	14	0.74	83	1,030
	300	Tractors/Loaders/Backhoes	3	7	84	0.37	653	8,114
	300	Welders	1	8	46	0.45	166	2,059
Paving	20	Pavers	2	8	81	0.42	544	588
	20	Paving Equipment	2	8	89	0.36	513	554
	20	Rollers	2	8	36	0.38	219	237
Architectural Coating	20	Air Compressors	1	6	37	0.48	107	115
CONSTRUCTION FUEL DEMAND (gallons of diesel fuel)								32,015

Notes:1 Using Carl Moyer Guidelines Table D-21 Fuel consumption rate factors (bhp-hr/gal) for engines less than 750 hp. (Source: https://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017_gl_appendix_d.pdf)

It is assumed that all construction worker trips are from light duty autos (LDA) along area roadways. With respect to estimated VMT, the construction worker trips would generate an estimated 235,117 VMT. Vehicle fuel efficiencies for construction workers were estimated in the air quality and greenhouse gas analysis using information generated using CARB's EMFAC model (see Appendix B for details). Table VI-3 shows that an estimated 7,600 gallons of fuel would be consumed for construction worker trips.

Table VI-3
CONSTRUCTION WORKER FUEL CONSUMPTION ESTIMATES

Phase	Number of Days	Worker Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	10	17.5	18.5	3237.5	30.94	105
Grading	20	15	18.5	5,550	30.94	179
Building Construction	230	51	18.5	217,005	30.94	7,015
Paving	20	15	18.5	5,550	30.94	179
Architectural Coating	20	10.2	18.5	3,774	30.94	122
Total Construction Worker Fuel Consumption						7,600

Notes:

1Assumptions for the worker trip length and vehicle miles traveled are consistent with CalEEMod 2022.1.1.29 defaults.

Tables V-4 and V-5 show the estimated fuel consumption for vendor and hauling during building construction and architectural coating. With respect to estimated VMT, the vendor and hauling trips would generate an estimated 71,685 VMT. For the architectural coatings it is assumed that the contractors would be responsible for bringing coatings and equipment with them in their light duty vehicles. Tables V-4 and V-5 show that an estimated 9,558 gallons of fuel would be consumed for vendor and hauling trips.

Table VI-4
CONSTRUCTION VENDOR FUEL CONSUMPTION ESTIMATES (MHD TRUCKS)¹

Phase	Number of Days	Vendor Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	10	0	10.2	0	8.57	0
Grading	20	0	10.2	0	8.57	0
Building Construction	230	19.9	10.2	46,685	8.57	5,448
Paving	20	5	10.2	1,020	8.57	119
Architectural Coating	20	0	10.2	0	8.57	0
Total Vendor Fuel Consumption						5,567

Notes:

1Assumptions for the worker trip length and vehicle miles traveled are consistent with CalEEMod 2022.1.1.29 defaults.

Table VI-5
CONSTRUCTION HAULING FUEL CONSUMPTION ESTIMATES (HHD TRUCKS)¹

Phase	Number of Days	Hauling Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	10	0	20	0	6.26	0
Grading	20	62.5	20	25,000	6.26	3,991
Building Construction	230	0	20	0	6.26	0
Paving	20	0	20	0	6.26	0
Architectural Coating	20	0	20	0	6.26	0
Total Construction Hauling Fuel Consumption						3,991

Notes:

1Assumptions for the hauling trip length and vehicle miles traveled are consistent with CalEEMod 2020.40 defaults.

Construction equipment used over the approximately 14-month construction phase would conform to CARB regulations and California emissions standards and is evidence of related fuel efficiencies. In addition, the CARB Airborne Toxic Control Measure limits idling times of construction vehicles to no more than five minutes, thereby minimizing unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Furthermore, the project has been designed in compliance with California's Energy Efficiency Standards and 2022 CALGreen Standards.

Construction of the proposed commercial manufacturing development would require the typical use of energy resources. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

Operational Energy Demand

Energy consumption in support of or related to project operations would include transportation energy demands (energy consumed by employee and patron vehicles accessing the project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

The largest source of operational energy use would be vehicle operation of customers. The site is located in an urbanized area just in close proximity to transit stops. Using the CalEEMod output, an average trip length for all vehicles was assumed to be 21.774 miles. To show a worst-case analysis, as the proposed project is an office project, it was assumed that vehicles would operate 365 days per year. Table 19 shows the worst-case estimated annual fuel consumption for all classes of vehicles from autos to heavy-heavy trucks. Table VI-6 shows that an estimated 106,511 gallons of fuel would be consumed per year for the operation of the proposed project.

**Table VI-6
ESTIMATED VEHICLE OPERATIONS FUEL CONSUMPTION**

Vehicle Type	Vehicle Mix	Number of Vehicles	Average Trip (miles) ¹	Daily VMT	Average Fuel Economy (mpg)	Total Gallons per Day	Total Annual Fuel Consumption (gallons)
Light Auto	Automobile	75.5	21.774	1,644	30.94	53.15	19,401
Light Truck	Automobile	13.2	21.774	287	25.55	11.24	4,104
Light Truck	Automobile	39.7	21.774	864	25.60	33.75	12,318
Medium Truck	Automobile	27.7	21.774	602	20.47	29.42	10,739
Light Heavy Truck	2-Axle Truck	5.1	21.774	111	16.63	6.69	2,442
Light Heavy Truck 10,000 lbs +	2-Axle Truck	1.4	21.774	30	15.79	1.90	695
Medium Heavy Truck	3-Axle Truck	2.6	21.774	56	8.57	6.52	2,379
Heavy Heavy Truck	4-Axle Truck	42.9	21.774	934	6.26	149.13	54,433
Total		208	--	4,529	--	291.81	--
Total Annual Fuel Consumption							106,511

Notes:

1 The trip generation assessment, the project is to generate 208 total net new trips after reduction of existing uses. Default CalEEMod vehicle fleet mix utilized.

1Based on the size of the site and relative location, trips were assumed to be local rather than regional.

Trip generation generated by the proposed project are consistent with other similar industrial uses of similar scale and configuration as reflected in the Trip Generation Assessment (TJW Engineering, 2025). That is, the proposed project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips, nor associated excess and wasteful vehicle energy consumption. Therefore, project

transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

The annual natural gas and electricity demands were provided per the CalEEMod output and are provided in Table VI-7.

**Table VI-7
PROJECT UNMITIGATED ANNUAL OPERATIONAL ENERGY DEMAND SUMMARY**

Natural Gas Demand	kBTU/year
Unrefrigerated Warehouse	2,319,509
Total	2,319,509
Electricity Demand	kWh/year
Unrefrigerated Warehouse	559,140
Parking Lot	152,253
Total	711,393

Notes:

1 Taken from the CalEEMod 2022.1.1.29 annual output.

As shown in Table VI-7, the estimated electricity demand for the proposed project is approximately 711,393 kWh per year. In 2022, the non-residential sector of the County of Riverside consumed approximately 8,720 million kWh of electricity. In addition, the estimated natural gas consumption for the proposed project is approximately 2,319,509 kBTU per year. In 2022, the non-residential sector of the County of Riverside consumed approximately 146.9 million therms of gas, or 14.69 billion kBTU. Therefore, the increase in both electricity and natural gas demand from the proposed project is insignificant compared to the County's 2022 demand.

Mitigation Measures: No mitigation measures are required.

(Sources: Air Quality and GHG Analysis Report Appendix A and Title 24 and Green Building Standards)

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

Regarding federal transportation regulations, the project site is located in an already developed area. Access to/from the project site is from existing roads. These roads are already in place so the project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be proposed pursuant to the ISTEA because SCAG is not planning for intermodal facilities in the project area.

Regarding the State's Energy Plan and compliance with Title 24 CCR energy efficiency standards, the applicant is required to comply with the California Green Building Standard Code requirements for energy efficient buildings and appliances as well as utility energy efficiency programs implemented by the SCE and Southern California Gas Company.

Regarding the State's Renewable Energy Portfolio Standards, the project would be required to meet or exceed the energy standards established in the California Green Building Standards Code, Title 24, Part 11 (CALGreen). CalGreen Standards require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. As shown above, the project would not conflict with any of the state or local energy plans. Therefore, the proposed project would have a less than significant potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Mitigation Measures: No mitigation measures are required.

(Sources: Referenced energy programs, Air Quality and GHG Analysis Report Appendix A and Title 24/Green Building Standards)

VII. GEOLOGY AND SOILS

The data for the following geology and soils evaluation is abstracted from an updated report titled “Geotechnical Update Builder’s Max APNs 371-150-001 and -002) Grand Avenue at Kathryn Way Lake Elsinore, California,” dated February 22, 2022 by Geocon West, Inc., 2/22/22. This document is used extensively in the following analysis, and it is provided as Appendix E to this Initial Study.

- 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 Willard strand of the Elsinore fault zone is mapped in the eastern portion of the site. The entire site is within a Riverside County Fault Hazard Zone. Mitigation has been incorporated to address this active fault trace across the property by including a setback as shown on Figure VI-1. The setback shown on Figure VI-1 provides 50 feet on each side of the fault zone to minimize potential for ground rupture impacts to the future project. Thus, implementation of the proposed project will be possible without causing a significant adverse impact due to onsite fault rupture. Based on the current Geotechnical Report, this finding remains valid for the proposed project. No additional mitigation is required.

Mitigation Measures: None required

(Source: A geology and soils report has been prepared for the Rome Hill Commercial Project site, refer to Appendix E)

- ii. *Strong seismic ground shaking? (Less Than Significant With Mitigation Incorporated.)*

Several fault traces run through the City, and as with much of Southern California, the proposed structures are likely to be subject to strong seismic ground shaking impacts should any major earthquakes occur in the future, particularly because the site is in close proximity to the Willard strand of the Elsinore Fault Zone, which, at this location is classified as an Alquist-Priolo Earthquake Zone. Additionally, several Active Fault Zones as defined by Riverside County travel throughout the City as shown in Figure 3.11-2 of the City’s General Plan Map of the City’s Earthquake Fault Zones. As a result, and like all other development projects in the City and throughout much of the Southern California Region, the proposed Project will be required to comply with all applicable seismic design standards contained in the current California Building Code (CBC), including Section 1613 Earthquake Loads, and in the Geotechnical Investigation (Appendix E). Compliance with the CBC and project specific Geotechnical study will ensure that structural integrity of the occupied buildings will be maintained in the event of earthquake related seismic ground shaking. The seismic design parameters outlined in the Geotechnical Report shall be enforced through the implementation of mitigation measure **GEO-1** below.

Mitigation Measure:

GEO-1 The Project shall comply with the recommendations to address geology and soils impacts within the Geotechnical Update prepared by GEOCON WEST, INC. Appendix e), including, but not

limited to: seismic ground shaking, subsidence, liquefaction, expansive soils, and corrosive soils, for all structures on site.

(Source: A geology and soils report has been prepared for the Rome Hill Commercial Project site, refer to Appendix E)

iii. *Seismic-related ground failure, including liquefaction? (Less Than Significant With Mitigation Incorporated)*

The GPEIR Figure 3.11-3 indicates that liquefaction potential at the site is Very High. This is substantiated in the Geotechnical Report which indicates measures in **GEO-1** shall be implemented to minimize potential for seismic-related ground failure. With implementation of measure **GEO-1** the impacts under this issue are considered less than significant.

Mitigation Measures: GEO-1.

(Source: A geology and soils report has been prepared for the Rome Hill Commercial Project site, refer to Appendix E)

iv. *Landslides? (Less Than Significant Impact)*

The project site is located on a shallow sloped alluvial fan that has no identified landslides. According to the site geotechnical report, the nearest geology formation with a potential for landsliding is about one mile distant. Thus, based on the data in Appendix E, the potential for landslide hazard is less than significant.

Mitigation Measures: No mitigation measures are required.

(Source: A geology and soils report has been prepared for the Rome Hill Commercial Project site, refer to Appendix E)

b) *Result in substantial soil erosion or the loss of topsoil? (Less Than Significant With Mitigation Incorporated)*

The potential for soil erosion, loss of topsoil, and/or placing structures on unstable soils is anticipated to be marginally possible at the site during ground disturbance associated with construction. The project site is vacant with some limited non-native vegetation coverage. City grading standards, best management practices and the Storm Water Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP) are required to control the potential onsite significant erosion hazards. The topography of the site generally slopes from the highest point to the south towards Grand Avenue. The elevation change is minimal on the property. The onsite soils have a moderate infiltration capability that will minimize surface runoff and natural erosion onsite.

However, during project construction when soils are exposed, temporary soil erosion could occur, which could be exacerbated by rainfall. Project clearing and grading would be managed through the preparation and implementation of a SWPPP, and will be required to implement best management practices to achieve concurrent water quality controls after construction is completed and the Rome Hill commercial buildings are occupied. The following mitigation measures or equivalent best management practices (BMPs) shall be implemented to address these issues:

GEO-2 Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill material. If covering

is not feasible, then measures such as the use of straw bales or sandbags shall be used to capture and hold eroded material on the Project site for future cleanup.

GEO-3 *All exposed, disturbed soil (trenches, stored backfill, etc.) shall be sprayed with water or soil binders twice a day, or more frequently if fugitive dust is observed migrating from the site within which the Rome Hill project site being constructed.*

With implementation of the above mitigation measures, implementation of the SWPPP, WQMP, and associated BMPs, any impacts under this issue are considered less than significant.

Mitigation Measures: Mitigation measures **GEO-2** and **GEO-3** are required.

(Source: A geology and soils report has been prepared for the Rome Hill Commercial Project site, refer to Appendix E)

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 With Mitigation Incorporated)*

The project site was determined by the Geotechnical Study to be a stable alluvial deposit with some unverified fill locations on the surface. The site will be prepared (graded and compacted) in accordance with the guidelines in mitigation measure **GEO-1** to ensure a stable building foundation that will minimize lateral spreading, subsidence or collapse. With implementation of **GEO-1**, potential impacts to the site soils and alluvial deposit can be controlled to a less than significant impact level.

Mitigation Measures: GEO-1

(Source: A geology and soils report has been prepared for the Rome Hill Commercial Project site, refer to Appendix E)

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? (No Impact)*

The onsite soils have been identified in Appendix E as having non-expansive soils or fill materials. Thus, the proposed project will not be located on an expansive soil type. No adverse impact will occur under this issue.

Mitigation Measures: No mitigation measures are required.

(Source: A geology and soils report has been prepared for the Rome Hill Commercial Project site, refer to Appendix E)

e) *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (No Impact)*

The Project does not propose any septic tanks or alternative wastewater disposal systems as it will connect to the regional wastewater collection system on Grand Avenue. Therefore, determining if the project site soils are capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater does not apply. No adverse impacts are anticipated.

Mitigation Measures: No mitigation measures are required.

(Source: A geology and soils report has been prepared for the Rome Hill Commercial Project site, refer to Appendix E)

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Less Than Significant With Mitigation Incorporated)

The potential for discovering paleontological resources during development of the Project is considered high based on the data compiled in the Appendix E. Also, because paleontological resources are often located beneath the ground surface and can only be discovered as a result of ground disturbance activities associated with clearing and grading, the following mitigation measure shall be implemented:

GEO-4

- *All Earth-moving operations in the project area should be monitored for potential paleontological remains by a qualified paleontological monitor. The monitor should be prepared to quickly salvage fossils, if they are unearthed, to avoid construction delays, but must have the power to temporarily halt or divert construction equipment to allow for removal of abundant or large specimens.*
- *Collected samples of sediment should be processed to recover small fossils, and all recovered specimens should be identified and curated at a repository with permanent retrievable storage.*
- *A report of findings, including an itemized inventory of recovered specimens, should be prepared upon completion of the procedures outlined above. The report should include a discussion of the significance of the paleontological findings, if any. The report and the inventory, when approved by the City of Lake Elsinore, would signify completion of the program to mitigate potential impacts on paleontological resources. Under these conditions, the proposed project may be cleared to proceed in compliance with CEQA provisions on paleontological resources.*

With incorporation of this mitigation measure, the potential for impact to paleontological resources will be reduced to a less than significant level. No additional mitigation is required.

Mitigation Measures: Mitigation measure **GEO-4** is required.

(Source: A geology and soils report has been prepared for the Rome Hill Commercial Project site, refer to Appendix E)

VIII. GREENHOUSE GAS EMISSIONS

The data for the following Greenhouse Gas Emissions evaluation is abstracted from a report titled “Rome Hill Commercial Project Air Quality, Greenhouse Gas, and Energy Impact Study, County of Riverside,” dated 1/28/2025 by MD Acoustics. This Study is used extensively in the following analysis, and it is provided as Appendix A to this Initial Study. Section 2.2 of the Greenhouse Gas (GHG) Study provides the background information regarding the international, national, state and local GHG Regulatory Setting. The City’s program is summarized below.

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

City of Lake Elsinore Climate Action Plan

In compliance with State Assembly Bill AB32 and Executive Order S-3-05, the City of Lake Elsinore adopted a Climate Action Plan (CAP) on December 13, 2011. The City's CAP is a long range plan designed to reduce community-wide greenhouse gas (GHG) emissions from activities within the City limits. Specifically, the CAP is designed to:

- Benchmark Lake Elsinore's existing (2008) GHG emissions and projected emissions relative to state-wide emissions targets;
- Establish GHG emissions reduction strategies and measures to reduce the City's proportionate share of emissions to meet the state-wide targets identified in Assembly Bill 32 (AB32), and Executive Order S-3-05;
- Set forth procedures to monitor and verify the effectiveness of the CAP and require amendment if the CAP is not achieving targeted levels of emissions;
- Mitigate Lake Elsinore's GHG emissions impacts (by reducing GHG emissions consistent with the State of California via the California Environmental Quality Act (CEQA) Guidelines, AB32, and Executive Order S-3-05). The CEQA Guidelines encourage the adoption of plans or mitigation programs as a means of comprehensively addressing the cumulative impacts of projects (see CEQA Guidelines, Sections 15064(h)(3) and 15130(c)); and,
- Serve as the programmatic tiering document for the purposes of CEQA within the City of Lake Elsinore for GHG emissions, and what applicable projects will be reviewed. If a proposed development project can demonstrate it is consistent with the applicable emissions reduction measures included in the CAP, the programs and standards that would be implemented as a result of the CAP, and the General Plan Update growth projections, the project's environmental review pertaining to GHG impacts may be streamlined as allowed by CEQA Guidelines Sections 15152 and 15183.5.

The CAP is not intended to limit future development or economic growth within Lake Elsinore; rather, by adopting a CAP, the City has established the compliance and performance standards that a project is to meet in order to satisfy State mandates. Discussions of the Project's consistency with the CAP's Greenhouse Gas Reduction Measures are discussed in Section 7.3.

The City of Lake Elsinore's CAP has a GHG emissions target that is specifically intended for use in evaluating the significance of GHG emissions from community-wide emissions. The City selected efficiency-based targets for the years governed by the General Plan to reduce community-wide emissions to 6.6 MT CO₂e per service population per year by 2020 (a 22.3% reduction from the 2008 rate of 8.5 MT CO₂e/SP) and to 4.4 MT CO₂e per service population per year by 2030 (a 48.2% reduction from the 2008 rate of 8.5 MT CO₂e/SP). These efficiency-based targets represent the AB 32 and Executive Order S-3-05 targeted emissions levels for 2020 and 2030 on a per service population basis and they were derived by dividing the state-wide AB 32 targeted emissions level for 2020 and statewide Executive Order S-3-05 targeted emissions level for 2030 by the 2020 and 2030 state-wide service population respectively. Therefore, these targets represent the maximum quantity of emissions each resident and employee in the State of California could emit in 2020 and 2030 based on emissions levels necessary to achieve the state-wide AB 32 and Executive Order S-3-05 GHG emissions reduction goals.

In order to meet the state-wide efficiency metric targets, the CAP must demonstrate that it can reduce community-wide emissions to 6.6 MT CO₂e/SP (or 944,737 MT CO₂e total based on an estimated 2020 service population of 143,142) by 2020 and 4.4 MT CO₂e/SP (or 1,334,243 MT CO₂e based on an estimated 2030 service population of 303,237) by 2030.

Therefore, to determine whether the project's GHG emissions are significant, this analysis uses the County

of Riverside CAP Update and SCAQMD draft local agency tier 3 screening threshold of 3,000 MTCO2e.

The project will be subject to the latest requirements of the California Green Building and Title 24 Energy Efficiency Standards (currently 2022) which would reduce project-related greenhouse gas emissions.

Constituent gases of the Earth's atmosphere, called atmospheric greenhouse gases (GHG), play a critical role in the Earth's radiation amount by trapping infrared radiation emitted from the Earth's surface, which otherwise would have escaped to space. Prominent greenhouse gases contributing to this process include carbon dioxide (CO₂), methane (CH₄), ozone, water vapor, nitrous oxide (N₂O), and chlorofluorocarbons (CFCs). This phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. Anthropogenic (caused or produced by humans) emissions of these greenhouse gases in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and residential land uses. Transportation is responsible for 41 percent of the State's greenhouse gas emissions, followed by electricity generation. Emissions of CO₂ and nitrous oxide (NO₂) are byproducts of fossil fuel combustion. Methane, a potent greenhouse gas, results from off-gassing associated with agricultural practices and landfills. Sinks of CO₂, where CO₂ is stored outside of the atmosphere, include uptake by vegetation and dissolution into the ocean. Refer to Table 6 of Appendix A which provides a description of each of the greenhouse gases and their global warming potential.

CEQA Guidelines define a significant effect on the environment as "a substantial, or potentially substantial, adverse change in the environment." To determine if a project would have a significant impact on greenhouse gases, the type, level, and impact of emissions generated by the project must be evaluated.

The following greenhouse gas significance thresholds are contained in Appendix G of the CEQA Guidelines, which were amendments adopted into the Guidelines on March 18, 2010, pursuant to SB 97. A significant impact would occur if the project would:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

However, despite this, currently neither the CEQA statutes, OPR guidelines, nor the draft proposed changes to the CEQA Guidelines prescribe thresholds of significance or a particular methodology for performing an impact analysis; as with most environmental topics, significance criteria are left to the judgment and discretion of the Lead Agency. As previously discussed, SCAQMD has drafted interim thresholds. The screening threshold of 3,000 MTCO2e per year for all land uses was used in this analysis.

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

The greenhouse gas emissions from project construction equipment and worker vehicles are shown in Table VIII-1. The emissions are from all phases of construction. The total construction emissions amortized over a period of 30 years are estimated at 16.75 metric tons of CO₂e per year. Annual CalEEMod output calculations are provided in Appendix A.

Table VIII-1
CONSTRUCTION GREENHOUSE GAS EMISSIONS

Activity	Emissions (MTCO2e) ¹		
	Onsite	Offsite	Total
Site Preparation	24.10	1.06	25.16
Grading	26.90	42.81	69.71
Building Construction	252.00	136.30	388.30
Paving	13.80	3.20	17.00
Coating	1.22	1.20	2.42
Total	318.02	184.57	502.59
Averaged over 30 years ²	10.60	6.15	16.75

Notes:

1. MTCO2e=metric tons of carbon dioxide equivalents (includes carbon dioxide, methane and nitrous oxide).
2. The emissions are averaged over 30 years because the average is added to the operational emissions, pursuant to SCAQMD.

* CalEEMod output (Appendix A)

Operational emissions occur over the life of the project. The operational emissions for the project are 1,441.32 metric tons of CO2e per year as shown in Table VIII-2. These emissions do not exceed the County of Riverside CAP Update and SCAQMD screening threshold of 3,000 metric tons of CO2e per year. Therefore, the project's GHG operational emissions are considered to be less than significant.

Table VIII-2
OPENING YEAR UNMITIGATED PROJECT-RELATED GREENHOUSE GAS EMISSIONS

Category	Greenhouse Gas Emissions (Metric Tons/Year) ¹					
	Bio-CO2	NonBio-CO2	CO2	CH4	N2O	CO2e
Area Sources ²	0.00	2.46	2.46	0.00	0.00	2.47
Energy Usage ³	0.00	295.00	295.00	0.02	0.00	296.00
Mobile Sources ⁴	0.00	973.00	973.00	0.03	0.10	1,004.00
Solid Waste ⁵	10.20	0.00	10.20	1.02	0.00	35.70
Water ⁶	8.91	48.00	56.90	0.92	0.02	86.40
Construction ⁷	0.00	16.53	16.53	0.00	0.00	16.75
Total Emissions	19.11	1,334.99	1,354.09	1.99	0.12	1,441.32
County of Riverside CAP and SCAQMD Draft Screening Threshold						3,000
Exceeds Threshold?						No

Notes:

- 1 Source: CalEEMod Version 2022.1.1.29
- 2 Area sources consist of GHG emissions from consumer products, architectural coatings, and landscape equipment.
- 3 Energy usage consist of GHG emissions from electricity and natural gas usage.
- 4 Mobile sources consist of GHG emissions from vehicles.
- 5 Solid waste includes the CO2 and CH4 emissions created from the solid waste placed in landfills.
- 6 Water includes GHG emissions from electricity used for transport of water and processing of wastewater.
- 7 Construction GHG emissions based on a 30-year amortization rate.

Mitigation Measures: No mitigation measures are required.

(Sources: Air Quality and GHG Analysis Report, Appendix A)

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 have the potential to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. As stated previously, both the County of Riverside and the City of Lake Elsinore have adopted Climate Action Plans; therefore, the project

and its GHG emissions have been compared to the goals of both the County of Riverside CAP Update as well as the City of Lake Elsinore CAP.

Consistency with the County of Riverside CAP Update

Per the County's CAP Update, the County adopted its first CAP in 2015 which set a target to reduce emissions back to 1990 levels by the year 2020 as recommended in the AB 32 Scoping Plan. Furthermore, the goals and supporting measures within the County's CAP Update are proposed to reflect and ensure compliance with changes in the local and State policies and regulations such as SB 32 and California's 2017 Climate Change Scoping Plan. Therefore, compliance with the County's CAP in turn reflects consistency with the goals of the CARB Scoping Plan, Assembly Bill (AB) 32 and Senate Bill (SB) 32.

Appendix D of the Riverside County CAP Update also states that project's that do not exceed the CAP's screening threshold of 3,000 MTCO2e per year are considered to have less than significant GHG emissions and are in compliance with the County's CAP Update. According to the County's CAP Update, projects that do not exceed emissions of 3,000 MTCO2e per year are also required to include the following efficiency measures:

- Energy efficiency matching or exceeding the Title 24 requirements in effect as of January 2017, and
- Water conservation measures that match the California Green Building Code in effect as of January 2017.

As stated above, the GHG emissions generated by the proposed project would not exceed the County of Riverside CAP Update screening threshold of 3,000 metric tons per year of CO2e.

Consistency with the City of Lake Elsinore CAP

The City of Lake Elsinore adopted the City of Lake Elsinore CAP, 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 and 4.4 MTCO2e per service population per year by 2030.

Appendix D of the CAP contains a project level worksheet that an applicant may use to demonstrate consistency with the General Plan growth potential and CAP. The following are the criteria for determining consistency with the CAP:

Is the project consistent with the General Plan land use designation?

The proposed project site is currently designated in the General Plan for General Commercial and High Density Residential land uses and zoned as C-P, Commercial Park and R-3, High Density Residential. The project is seeking a General Plan Amendment to Light Industrial and a zone change to C-M, Commercial-Manufacturing in the City of Lake Elsinore.

The proposed project is to develop the site with multiple commercial manufacturing buildings and uses. Therefore, the proposed project is anticipated to be consistent with the updated zoning and land uses specified in the City of Lake Elsinore's General Plan. Therefore, the project meets this criterion.

Is the project consistent with the General Plan population and employment projections for the site, upon which the CAP modeling is based?

The City of Lake Elsinore General Plan's build-out of population, housing and employment have anticipated

the development of the Project site as a commercial area with a current land use of General Commercial over a portion of the site. Therefore, this buildout projection was used in the preparation of the CAP. Therefore, the project meets this criterion.

Does the project incorporate the following CAP measures as binding and enforceable components of the project?

Until these measures have been formally adopted by the City and incorporated into applicable codes, the requirements must be incorporated as mitigation measures applicable to the project (CEQA Guidelines, Section 15183.5(b)(2)).

Table VIII-3 provides a list of the reduction measures for new non-residential developments included in CAP Appendix D. Table VIII-3 also provides a project consistency analysis of each measure. Per Table VIII-3, the Project meets this criterion.

Table VIII-3
CITY OF LAKE ELSINORE CAP GHG REDUCTION MEASURES FOR COMMERCIAL DEVELOPMENT AND
PROJECT CONSISTENCY

Local Measure	Measure Description	Project Consistency
T-1.2 Pedestrian Infrastructure	Through the development review process, require the installation of sidewalks along new and reconstructed streets. Also require new subdivisions and large developments to provide sidewalks or paths to internally link all uses where applicable and provide connections to neighborhood activity centers, major destinations, and transit facilities contiguous with the project site; implement through conditions of approval.	Consistent. The proposed project does not currently contain any sidewalks/pathways and the project does not include any new or reconstructed streets. Sidewalks/pathways are provided within the project site.
T-1.4 Bicycle Infrastructure	Through the development review process, require new development, as applicable, to implement and connect to the network of Class I, II and III bikeways, trails and safety features identified in the General Plan, Bike Lane Master Plan, Trails Master Plan and Western Riverside County Non-Motorized Transportation plan; implement through conditions of approval. The City will also continue to pursue and utilize funding when needed to implement portions of these plans.	Not Applicable. Per the Lake Elsinore General Plan Circulation Element, Figure 2.5 Bikeway Plan there are no bikeways or trails located adjacent to the proposed project site.
T-1.5 Bicycle Parking	Through the development review process, enforce the following short-term and long-term bicycle parking standards for new non-residential development (consistent with 2010 California Green Building Code [CalGreen], Section 5.106.4), and implement through conditions of approval: Short-Term Bicycle Parking: If the project is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitor entrance, readily visible to passers-by, for 5% of visitor motorized vehicle parking capacity, with a minimum of one two-bike capacity rack. Long-Term Bicycle Parking: For buildings with over 10 tenant occupants, provide secure bicycle parking for 5% of tenant-occupied motorized vehicle parking capacity, with a minimum of one space.	Not Applicable. The project is not anticipated to generate visitor traffic and the project is not forecast to have more than 10 tenants.
T-2.1 Designated Parking for Fuel- Efficient Vehicles	Amend the Municipal Code to require that new non-residential development designate 10% of total parking spaces for any combination of low-emitting, fuel-efficient and carpool/vanpool vehicles (consistent with CalGreen Tier 1, Sections A5.106.5.1 and A5.106.5.3), and implement	Consistent. As shown on the project site plan, the project is consistent with Section 17.18.045 of the County of Riverside Municipal Code and Table 5.106.5.3.3 of CalGreen in regards to the number of electric vehicle/vanpool parking spaces required. The site includes a total of 180

Local Measure	Measure Description	Project Consistency
	through conditions of approval. Parking stalls shall be marked —Clean Air Vehicle.	parking spaces and nine of those parking spaces are to be electric vehicle charging stations.
E-1.1 Tree Planting	Through the development review process, require new development to plant at minimum one 15-gallon non-deciduous, umbrella-form tree per 30 linear feet of boundary length near buildings, per the Municipal Code. Trees shall be planted in strategic locations around buildings or to shade pavement in parking lots and streets.	Consistent. This measure is implemented by the Departments of Planning, Public Works, and Parks and Recreation through City ordinance, development review process, and conditions of approval. The landscape design proposed for this new commercial development aims to meet the City of Lake Elsinore requirements by providing plant material that is not only diverse in color and texture, but is also drought tolerant. Refer to the landscaping description in the Project Description and the copy of the Landscape Plan. The proposed project elements would be required to comply with the City ordinances and conditions of approval, if applicable.
E-1.2 Cool Roof Requirements	Amend the City Municipal Code to require new non-residential development to use roofing materials having solar reflectance, thermal emittance or Solar Reflectance Index (SRI) 3 consistent with CalGreen Tier 1 values (Table A5.106.11.2.1), and implement through conditions of approval.	Consistent. This measure is implemented by the Departments of Planning and Building through City ordinance, development review process, and conditions of approval. The proposed Project elements would be required to comply with the City ordinances and conditions of approval, if applicable.
E-1.3 Energy Efficient Building Standards	Adopt an ordinance requiring that all new construction exceed the California Energy Code requirements, based on the 2008 Energy Efficiency Standards by 15% (consistent with CalGreen Tier 1), through either the performance based or prescriptive approach described in the California Green Building Code; implement through conditions of approval. Alternately, a solar photovoltaic system and/or solar water heating may be used to assist in meeting all or a portion of the 15% requirement.	Consistent. The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code in the CCR. Part 11 establishes voluntary standards, that are mandatory in the 2022 edition of the Code, on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The proposed project will be subject to these mandatory standards.
E-4.1 Landscaping	Through the development review process, enforce the City's Assembly Bill 1881 Landscaping Ordinance; implement through conditions of approval.	Consistent. AB 1881 Landscaping Ordinance requires that landscaping be water efficient, thereby consuming less energy and reducing emissions. The proposed project elements would be required to comply with these landscape requirements.
E-4.2 Indoor Water Conservation Requirements	Amend the City's Uniform Building Code to require development projects to reduce indoor water consumption by 30% (consistent with CalGreen Tier 1, Section A5.303.2.3.1), and implement through conditions of approval.	Consistent. The proposed project will utilize water fixtures that are sold in California that are required to meet CCR Title 20, Sections 1601 – 1608 that require all water fixtures to be low flow and provide an average water use reduction of 30%.
S-1.4 Construction and Demolition Waste Diversion	Amend the Municipal Code to require development projects to divert, recycle or salvage at least 65% of nonhazardous construction and demolition debris generated at the site by 2020 (consistent with CalGreen Tier 1, Section A5.408.3.1). Require all construction and demolition projects to be accompanied by a waste management plan for the project and a copy of the completed waste management report shall be provided upon completion.	Consistent. The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code in the CCR. Part 11 establishes voluntary standards, that are mandatory in the 2022 edition of the Code. Section 5.408 requires the recycling and/or salvaging for reuse of a minimum of 65 percent of the nonhazardous construction and demolition

Local Measure	Measure Description	Project Consistency
		waste. The proposed project will be subject to these mandatory standards.

Notes:

1 Source: City of Lake Elsinore Climate Action Plan

Based on the forecast GHG emissions and this preceding consistency analysis, the proposed project can be developed with a less than significant impact on GHG emissions.

Mitigation Measures: No mitigation measures are required.

(Sources: Air Quality and GHG Analysis Report, Appendix A)

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 With Mitigation Incorporated)*

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 With Mitigation Incorporated)*

a&b) The Project may create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or may 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. During construction there is a potential for accidental release of petroleum products (fuel and hydraulic fluids) in sufficient quantity to pose a significant hazard to people and/or the environment. Also, the future tenants will utilize cleaning materials, pesticides and other chemicals in small quantities in support of storage operations. The following mitigation measure will be incorporated into the Storm Water Pollution Prevent Plan (SWPPP) prepared for the Project and implementation of this measure can reduce this potential short-term construction hazard to a less than significant level.

HAZ-1 *All spills or leakage of petroleum products during construction activities will be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste will be collected and disposed of at an appropriately licensed disposal or treatment facility. This measure will be incorporated into the SWPPP and the WQMP prepared for the Project development.*

Implementation of measure **HAZ-1** and compliance with all Federal, State, and local regulations governing the storage and use of hazardous materials which is required, will ensure that the Project operates in a manner that poses no substantial hazards (during both construction and occupancy) to the public or the environment from such activities. No further mitigation is required.

Mitigation Measures: Mitigation measure **HAZ-1** is required.

(Sources: GPEIR, Chapter 3.10, Hazards and Hazardous Materials.)

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 project site is located more than one-quarter mile from a school. The proposed project will not utilize any acutely hazardous materials on the project site, either to support construction or future operations. Since implementation of the Project will not emit acute hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, and implementation of the site for commercial manufacturing uses would not normally involve any acutely hazardous materials, the potential for exposing a school and its students to a significant hazard is considered to be less than significant impact. No additional mitigation is required.

Mitigation Measures: No mitigation required.

(Sources: GPEIR, Chapter 3.10, Hazards and Hazardous Materials.)

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? (No Impact)*

The provisions in Government Code Section 65962.5 are commonly referred to as the "Cortese List" (after the Legislator who authored the legislation that enacted it). The list, or a site's presence on the list, has bearing on the local permitting process as well as on compliance with CEQA.

According to the California State Waterboards GEOTRACKER site¹ which provides information regarding Leaking Underground Storage Tanks, the Project site is not 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 not create a significant hazard to the public or the environment. There are two permitted underground storage tanks within one mile of the Project site. Refer to Figure IX-1, *Geotracker Site*.

The Department of Toxic Substances Control's Hazardous Waste and Substances Site List (Cortese List) site² does not show any Hazardous Waste and Substances Sites currently located on the Project sites. Refer to Figure IX-2, *Envirostor Site*. Based upon the available data, there is no evidence to support that hazardous wastes or contamination would be present on the site. No additional mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: Geotracker; GPEIR, Chapter 3.10, Hazards and Hazardous Materials.)

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 Project site is located approximately 1.6 miles from an operating private airport, Skylark Airport, which is located at the southeast corner of Lake Elsinore. As shown on Figure IX-3 Zone D (which encompasses the project site) has minimal conflicts with the airport operations. The proposed use of two commercial manufacturing buildings at the project site will have no conflict with the airport operations at this small private airport. No adverse impacts are anticipated and no mitigation is required.

¹ <http://geotracker.waterboards.ca.gov/>

² http://www.envirostor.dtsc.ca.gov/public/mapfull.asp?global_id=&x=-119&y=37&zl=18&ms=640,480&mt=m&findaddress=True&city=32397%20Riverside%20Dr,%20Lake%20Elsinore,%20CA%2092530&zip=&county=&federal_superfund=true&state_response=true&voluntary_clean_up=true&school_cleanup=true&ca_site=true&tiered_permit=true&evaluation=true&military_evaluation=true&school_investigation=true&operating=true&post_closure=true&non_operating=true

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore GPEIR and Land Use map)

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

According to the City's General Plan, no evacuation routes have been identified, though effectively I-15, SR74/Riverside Drive and Grand Avenue could be considered evacuation routes within the City. The proposed Project will be limited to the project site and is not anticipated to impact any surrounding potential evacuation route functions on Grand Avenue during construction. The project site is located just north of Grand Avenue. It is not anticipated that development of the project site would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan because the site activities will be confined within the proposed project site. The proposed onsite parking and circulation plans will be reviewed by the local Fire Department and City Engineering Department to ensure that the Project's ingress/egress are adequate for accommodating emergency vehicles. Therefore, there is a less than significant potential for the development of the Project to physically interfere with any adopted emergency response plans, or evacuation plans. No significant impacts are anticipated and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore GPEIR and Circulation Element)

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 City of Lake Elsinore General Plan, the proposed Project is not located in a high wild fire hazard zone and is served by the Riverside County Fire Department's urban fire protection services. Therefore, Project implementation would not result in a potential to expose people or structures to wildland fire hazards. Potential Project-related impacts are less than significant; no mitigation measures are required.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR, Public Services)

X. HYDROLOGY AND WATER QUALITY

The data for the following Hydrology and Water Quality evaluation is abstracted from a report titled "Project Specific Water Quality Management Plan Rome Hill Commerce Park," dated 1/16/2023 by W.H. Civil. This Study is used extensively in the following analysis, and it is provided as Appendix E to this Initial Study. Section 2.2 of the Water Quality Management study provides the background information regarding the Federal, State and local Regulatory Setting.

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? (Less Than Significant With Mitigation Incorporated)

The proposed project is located within the Santa Ana River Region (Region No. 8), which is governed by the Santa Ana Regional Water Quality Control Board (RWQCB or Regional Board). The project would be supplied with water by Elsinore Valley Municipal Water District that uses a mix of groundwater and imported surface water to meet customer demand. For a developed area, the only three sources of potential violation of water quality standards or waste discharge requirements are from generation of municipal

wastewater, stormwater runoff, and potential discharges of pollutants, such as accidental spills. Municipal wastewater is delivered to the Elsinore Valley Municipal Water District's (EVMWD) treatment plant located in Lake Elsinore. The EVMWD is responsible for the collection, transmission, treatment, and disposal of wastewater from its member agencies. The Santa Ana Regional Board is responsible for ensuring the District's Water Reclamation Facility complies with waste discharge requirements and in so doing ensures that future wastewater generated by the proposed project will not degrade downstream water quality.

To address stormwater and accidental spills within this environment, any new project must ensure that site development implements a Stormwater Pollution Prevention Plan (SWPPP) (National Pollutant Discharge Elimination System, (NPDES) requirement) to control potential sources of water pollution that could violate any standards or discharge requirements during construction, and a Water Quality Management Plan (Preliminary WQMP, Appendix E) to ensure that project-related stormwater and accidental discharges after development meets discharge requirements from the property over the long-term. The Preliminary WQMP specifies stormwater runoff permit Best Management Practices (BMPs) requirements for capturing, retaining, and treating on-site stormwater once the units have been installed and occupied. The whole lot will drain to the infiltration basin proposed at the rear of the lot. The proposed will be sized to handle total water volume generated on-site. Because the project site will consist of a mix of impervious and pervious surfaces, the project has identified onsite drainage system components (a biofiltration swale and an underground infiltration system and treatment unit) that will generally be installed as part of the project to control water quality degradation and to control the volume of stormwater discharges from the developed site to a level comparable or below the existing condition. Refer to Appendix E. The SWPPP will specify the specific BMPs that the Project would be required to implement during construction activities to ensure that all potential water pollutants of concern generated during construction are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property in surface runoff. With implementation of these mandatory Plans (SWPPP and WQMP) and their BMPs, as well as mitigation measure **HAZ-1** above, the development of the Rome Hill Commercial Development is not forecast to cause a violation of any water quality standards or waste discharge requirements.

Mitigation Measures: Implementation of the SWPPP and WQMP are mandatory and do not require project specific mitigation. Measure **HAZ-1** will be implemented in support of the SWPPP and WQMP.

(Sources: Appendix G and Site Plan)

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)*

Implementation of the proposed Project is not forecast to deplete groundwater supplies that would substantially affect the water availability for existing or planned land uses or biological resources. It is anticipated that, based on previous studies at the project site, the depth to groundwater is anticipated to be approximately greater than 36 feet below the ground surface (bgs). Therefore, given that the project does not require extensive excavation, the potential to intercept the local groundwater table during grading of the project site is considered to be less than significant. The regional groundwater aquifer would not be physically altered or impacted as a result of the proposed project. The design of the drainage and retention facilities of the proposed project (refer to Appendix G) would encourage groundwater recharge.

The Rome Hill Commercial Development Project would be supplied with water by the Elsinore Valley Municipal Water District (EVMWD) that uses imported surface water and local groundwater to meet primary customer potable water demand. Using imported surface water helps prevent overdraft of local groundwater basins. Assuming two Commercial buildings totaling 92,760 SF and associated landscaping,

the project would require about 15 acre-feet per year. The City General Plan EIR forecasts adequate water supplies through 2030 as evidenced by the summary provided on Table 3.16-7 of the GPEIR. The total supply for the District through 2030 is 79,181 acre-feet per year (AFY), while the demand for 2030 is forecast to be 68,169 AFY. Thus, the anticipated available water supply within EVMWD's retail service area is forecast to be greater than the demand for water in the future, which indicates that the District has available capacity to serve the proposed project without significant adverse impacts on area groundwater basins.

While the development of the Project may result in a slight reduction in the amount of surface runoff recharge associated with future site runoff, this reduction is expected to be off-set/replaced by infiltration from the onsite infiltration basins, as well as the required onsite landscaping allowing percolation of onsite rainfall. The development of the project will, therefore, not substantially interrupt the existing percolation of the site, or any flow of groundwater under the project site. No significant adverse impacts to groundwater resources are forecast to occur from implementing the proposed Project. No mitigation is required.

Mitigation Measures: No additional mitigation measures are required.

(Sources: Appendix G, Site Plan and the City GPEIR, Chapter 3.16)

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)*

The Preliminary WQMP Study (Appendix E) addresses the onsite flows and comparable runoff for post-developed condition of the Commercial Development project. The site design envisions that sheet flow will be discharged from the developed portion of the project site to a bio-infiltration swale west of the developed site. This swale will convey the flows from the developed site to the Underground Infiltration Basin to be installed at the north end of the project site. Table D.3 of the Study (Appendix G) indicates that the Design Capture volume of runoff is 13,789 cubic feet and the Basin's design will accommodate 14,257 cubic feet. Based on this information, the proposed Rome Hill Commercial Development Project is not forecast to cause significant downstream erosion or siltation on- or off-site as downstream flows will not be increased.

Mitigation Measures: No mitigation measures are required.

(Sources: Appendix G and Site Plan)

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)*

Refer to the evaluation in Section X.c.i. and Appendix G for an analysis of the project's impacts on downstream runoff.

Based on this information, the proposed project is not forecast to result in flooding on- or offsite.

Mitigation Measures: No mitigation measures are required.

(Sources: Appendix G and Site Plan)

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)*

Refer to the evaluation in Section X.c.i. and Appendix G for an analysis of the project's impacts on downstream runoff.

Based on this information, the proposed project is not forecast to result in exceeding the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Mitigation Measures: No mitigation measures are required.

(Sources: Appendix E and Site Plan)

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

Refer to the evaluation in Section X.c.i. and Appendix E for an analysis of the project's impacts on downstream runoff.

Based on this information, the proposed project is not forecast to result in impeding or redirecting flood flows.

Mitigation Measures: No mitigation measures are required.

(Sources: Appendix G and Site Plan)

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (No Impact)

Implementation of the Project has no potential to expose people or structures to a significant risk of inundation by seiche, tsunami, or other flood hazards. According to the FEMA FIRMette map in Appendix G, the proposed Project is located outside of any flood hazard area. Furthermore, the Project is located about 25 miles from the Pacific Ocean, and is separated by the Peninsular Mountain Range from the Ocean. Therefore, the potential to expose people or structures to a significant risk of flood hazard due to tsunami would be minimal. Lake Elsinore is located approximately 1,600 feet north of the site and has a water surface elevation of approximately 1,238 feet Mean Sea Level (MSL). Lake water surface elevations are 1,244 feet MSL and outflow channel elevations are 1,255 feet MSL. The hill located just northwest of the proposed development acts as a barrier between the site and the lake, with a peak of approximately 1,283 feet above MSL. Further, the proposed development elevations will be approximately 1,268 feet above MSL. Thus, the potential for a seiche on Lake Elsinore to impact the project site is considered less than significant. No mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: Appendix D, Appendix G, Appendix F, and Site Plan)

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

In 2014, Governor Brown signed into law the Sustainable Groundwater Management Act, also known as SGMA. The Act took effect in 2015. It requires for the first time in state history that groundwater resources be sustainably managed by local agencies through the formation of Groundwater Sustainability Agencies (GSAs) in basins that are deemed high-priority or medium-priority by the State Department of Water Resources. In such basins, GSAs are required to develop and implement Groundwater Sustainability Plans." The groundwater basin underlying the Project is not considered to be a basin that requires immediate

management under the Sustainable Groundwater Management Act. As such, the Project would not conflict with a sustainable groundwater management plan. Water consumption and effects in the basin indicate that the proposed Project's water demand is considered to be minimal relative to the overall water resources required to meet the City's and EVMWD's overall potable water demands. By controlling water quality during construction and operations through implementation of both short- (SWPPP) and long- (WQMP) term best management practices at the site, no potential for conflict or obstruction of the Regional Board's Water Quality Control Plan has been identified.

Mitigation Measures: No mitigation measures are required.

(Sources: Appendix G, Site Plan and EVMWD 2020 Urban Water Management Plan)

XI. LAND USE AND PLANNING

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

Refer to the aerial photo provided as Figure 2, which shows the Project's site-specific location. The project site is presently designated on the General Plan as a mix of General Commercial (GC) and High Density Residential (HDR), with broadly consistent zoning with High Density Residential and Commercial Park classifications. The project will require a change in land use from the City of Lake Elsinore to Light Industrial (GP) and Commercial Manufacturing (Zoning). The Project is located within a currently vacant site. The project site has varying levels of development on three sides: mixed use (industrial and residential) on the east; industrial and commercial on the south; and industrial, open space and residential on the west. North of the site is open space transitioning to the southern edge of Lake Elsinore. Either the Commercial or High Density Residential uses will allow large buildings on the project site (up to three stories) so the proposed structures that would be built under the proposed land use designation will not substantially increase building mass on the site. The development of the two buildings at this location would not conflict with surrounding land uses and the surrounding land use designations and zoning classifications. As noted, the proposed development will not physically divide an established community. Consequently, the development of the project site with the proposed uses will not divide any established community in any manner. Therefore, no significant impacts under this issue are anticipated and no mitigation is necessary.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and GPEIR)

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? (Less Than Significant Impact)*

Based on the project's entitlements, consistency with the General Plan land use designation and zoning classification (land use plans) will be achieved if the proposed project is approved. Consistency of the project design with specific policies or regulations related to avoidance or mitigation of environmental effects is documented by this IS/MND, which has determined that no significant effects will result from implementing the proposed project. Finally, it is assumed that through City planning staff acceptance of the applications for the proposed project and then working with the developer to ensure that the project meets the City's design guidelines, the project will be found consistent with City requirements. Based on these findings, the project implementation will have a less than significant potential to conflict with Plan elements, policies or regulations adopted to avoid or mitigate an environment effect.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan, the GPEIR, and the LEMC)

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? (No Impact)*

The proposed site for the Rome Hill Commercial Development Project is moderately disturbed as it currently consists of graded and maintained open space land. The site is in an urbanizing area surrounded by existing and prospective development to the east, south, and west within the City of Lake Elsinore and adjacent County areas. According to the map prepared for the Lake Elsinore General Plan depicting Mineral Resources, provided as Figure 3.12-1 of the GPEIR, the Project is not located on a site that contains known mineral resources of any type. Therefore, the development of the proposed Project is not forecast to cause any loss of mineral resource values to the region or residents of the state, nor would it result in the loss of any locally important mineral resources identified on the City's General Plan. No impacts would occur under this issue. No mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR)

- 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)*

Based on the data in the General Plan and GPEIR, no mineral resource recovery site is identified for the project location; thus, no adverse impact to mineral resources or recovery of such resources will be caused by project implementation.

Mitigation Measures: No mitigation measures are required.

(Sources: General Plan EIR)

XIII. NOISE

The data for the following Noise impact evaluation is abstracted from a report titled "Rome Hill Commercial Project Noise Impact Study City of Lake Elsinore, CA," dated 12/10/2021 by MD Acoustics. This Study is used extensively in the following analysis, and it is provided as Appendix I to this Initial Study. Section 2.0 of the Noise Study provides the background information regarding noise fundamentals, while the national, and state Regulatory Setting is also provided by the Noise Study. The City's noise guidelines are summarized below.

City of Lake Elsinore Noise Regulations

The project falls within the City of Lake Elsinore. The City outlines their noise regulations and standards within the Noise Element from the General Plan and the Noise Ordinance from the Municipal Code. For purposes of this analysis, the performance standards contained in LEMC Section 17.176 (Noise Control) are used to evaluate the stationary noise impacts from the proposed project. The project impacts were compared to the City's commercial and residential noise standards.

LEMC Section 17.176 (Noise Control)

Lake Elsinore lays out daytime and nighttime noise limits for an individual operation for residential, commercial, and industrial zones. These limits must not be exceeded for 30 minutes or more within an hour. These limits plus 5 dB must not be exceeded for 15 minutes or more within an hour. These limits plus 10 dB must not be exceeded for 5 minutes or more within an hour. These limits plus 15 dB must not be exceeded for 1 minutes or more within an hour. These limits plus 20 dB must not be exceeded at any time. If the ambient exceeds these levels, each category must be raised 5 dB.

Table XIII-1
LAKE ELSINORE EXTERIOR NOISE LIMITS

Receiving Land Use Category	Time Period	Noise Level (dBA)
Single-Family Residential	10:00 p.m. – 7:00 a.m.	40
	7:00 a.m. – 10:00 p.m.	50
Multiple Dwelling Residential	10:00 p.m. – 7:00 a.m.	45
	7:00 a.m. – 10:00 p.m.	50
Public Space		
Limited Commercial and Office	10:00 p.m. – 7:00 a.m.	55
	7:00 a.m. – 10:00 p.m.	60
General Commercial	10:00 p.m. – 7:00 a.m.	60
	7:00 a.m. – 10:00 p.m.	65
Light Industrial	Anytime	70
Heavy Industrial	Anytime	75

Construction Noise Regulations

Construction must not occur between the hours of 7 PM and 7 AM or on weekends or holidays. Mobile equipment operating short-time (10 days or less) and intermittently has a maximum noise level restriction of 75 dBA at single-family residential areas. Stationary equipment with long-term operation and repetitive use has a maximum noise level of 60 dBA at single-family residential areas. At commercial properties, mobile equipment must be 85 dBA or less and stationary equipment must be 75 dBA or less. Construction vibration must be imperceptible beyond the property line.

Please refer to Section 5 of Appendix I for a discussion of the methods used to measure the existing background noise environment in the project area.

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 With Mitigation Incorporated)

Existing Noise Environment

One (1) 10-minute ambient noise measurement and one (1) hour and a half measurement were conducted at the project on 12/3/2021. These noise monitoring locations are illustrated in Figure XIII-1. The measurement measured the Leq, Lmin, Lmax and other statistical data (e.g. L2, L8) and is presented in Tables XIII-2 and XIII-3. The noise measurements were taken to determine the existing baseline noise conditions.

Table XIII-2
SHORT TERM NOISE MEASUREMENT RESULTS

Date	Start Time	Leq	Lmax	Lmin	L(2)	L(8)	L(25)	L(50)	L(90)
12/3/2021	1:26 PM	68.4	84.3	45.2	75.0	71.9	69.4	66.5	57.2

1. Short-term noise monitoring ST1 is illustrated in Figure XIII-1.

Table XIII-3
LONG-TERM NOISE MEASUREMENT DATA (dBA)¹

Date	Start Time	Leq	Lmax	Lmin	L(2)	L(8)	L(25)	L(50)	L(90)
12/3/2021	3:48 PM	52.5	64.9	44.8	59.9	56	52.5	50.9	46.5

1. Long-term noise monitoring LT1 is illustrated in Figure XIII-1.

Figure XIII-1: NOISE MEASUREMENT LOCATIONS



The results of the short-term noise data gathering at the site (shown on Figure XIII-1, site "S") "a" represented in Tables XIII-2. Noise data indicates that ambient noise level was 52.5 dBA Leq at the ST1 site. Additional field notes and photographs are provided in Appendix A of Appendix I. The L50 limit of 50 dBA was exceeded. The project must therefore not exceed the ambient level.

The results of the long-term noise data are presented on Table XIII-3. The noise data indicates that the ambient noise level was 68.4 at site "L" on Figure XIII-1. The L50 limit of 50 dBA, the L25 limit of 55 dBA, the L8 limit of 60 dBA, the L2 limit of 65 dBA, and the Lmax level of 70 dBA are exceeded.

Operational Noise Impacts and Mitigation

This assessment analyzes future noise impacts to and from the project and compares the results to the City's Noise Standards. The analysis details the estimated exterior noise levels associated with traffic from adjacent roadways and from future on-site stationary noise sources.

Due to the location of the proposed loading dock facilities, receptors that may be affected by project

operational noise include the existing residences to the southeast. The worst-case stationary noise was modeled using SoundPLAN acoustical modeling software. The model utilizes SoundPLAN's sound level data for the loading docks and parking specified within Section 5.4 of this report. Loading activity constitutes the project's maximum operational noise levels.

A total of four (4) receptor locations were modeled to evaluate the proposed project's operational noise impact to adjacent existing or future noise sensitive land uses. Table XIII-4 demonstrates the project plus ambient noise levels. Project plus ambient noise level projections are anticipated to range between 53 to 68 dBA Leq at the receptors R1 – R4. In addition, Table XIII-4 provides the anticipated change in noise level as a result of the proposed project during daytime operating conditions. The levels are not anticipated to increase as a result of the project; however, the Noise study recommends implementation of mitigation measure **NOI-1**. The impact is therefore less than significant with implementation of **NOI-1**.

Table XIII-4
WORST-CASE PREDICTED OPERATIONAL NOISE LEVELS (DBA)

Receptor ¹	Existing Ambient Noise Level (dBA, Leq) ²	Project Noise Level (dBA, Leq) ³	Total Combined Noise Level (dBA, Leq)	Exceeds Ordinance?	Change in Noise Level as Result of Project
R1	53	41	53	NO	0
R2	53	45	53	NO	0
R3	68	38	68	NO	0
R4	68	37	68	NO	0

Notes:

1. Receptor locations in Exhibit F. R1 to R3 are industrial.
2. The measured ambient Leq .
3. Residential uses are acceptable up to 50 dBA Leq during the day.

Noise Impacts to On/Off-Site Receptors Due to Project Generated Traffic

The project would generate 184 daily passenger car equivalent trips of which an estimated 18 would occur in the AM peak hour and 19 would occur in the PM peak hour. Per the memo provided by TJW Engineering, Inc., 12/2/2021 (Rome Hill Commercial Trip Generation Analysis and VMT Screening), see Appendix B. This equates to approximately one passenger car equivalent trip every three minutes in the PM peak hour and would not result in a substantial increase in traffic noise.

Traffic along the subject roadways would need to double in average daily traffic volumes to generate a 3 dBA increase in noise level. Since the project generates a nominal amount of traffic relative to the existing ADTs, the project's traffic noise level increase would be nominal and therefore less than significant.

Mitigation Measures:

NOI-1 The following noise reduction measures have been implemented into the plan:

- *All roof-top exterior equipment will be shielded from view with solid parapets that are taller than the equipment constructed with a surface weight of at least 4.2 lb/ft².*
- *A 6 foot wall with a surface weight of at least 4.2 lb/ft² will surround the site.*

(Sources: Appendix G)

Construction Noise Impacts

The degree of construction noise may vary for different areas of the project site and also vary depending on the construction activities. Noise levels associated with the construction will vary with the different phases of construction. The Federal Environmental Protection Agency (EPA) has compiled data regarding the noise generated characteristics of typical construction activities. The data is presented in Table XIII-5.

Table XIII-5
TYPICAL CONSTRUCTION EQUIPMENT NOISE LEVELS
Equipment Powered by Internal Combustion Engines

Type	Noise Levels (dBA) at 50 Feet
Earth Moving	
Compactors (Rollers)	73 - 76
Front Loaders	73 - 84
Backhoes	73 - 92
Tractors	75 - 95
Scrapers, Graders	78 - 92
Pavers	85 - 87
Trucks	81 - 94
Materials Handling	
Concrete Mixers	72 - 87
Concrete Pumps	81 - 83
Cranes (Movable)	72 - 86
Cranes (Derrick)	85 - 87
Stationary	
Pumps	68 - 71
Generators	71 - 83
Compressors	75 - 86

Impact Equipment

Type	Noise Levels (dBA) at 50 Feet
Saws	71 - 82
Vibrators	68 - 82
Notes:	
¹ Referenced Noise Levels from the Environmental Protection Agency (EPA)	

Construction is considered a short-term impact and would be considered significant if construction activities are taken outside the allowable times as described in the LEMC Section 7.34.060. Project construction is anticipated to occur during the permissible hours according to the LEMC. Construction noise will have a temporary or periodic increase in the ambient noise level above the existing within the project vicinity. Furthermore, noise reduction measures are provided to further reduce construction noise. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. The loudest piece of mobile equipment (a bulldozer) is anticipated to be 85 dBA at 50 ft from the source. At 70 ft, which is the distance from the nearest proposed building to 10 ft within the residential property line, the Lmax level would be 82 dBA. An 8' temporary barrier is required along the residential property line to bring the level to 73 dBA, which is below the mobile equipment construction noise limit of 75 dBA.

The loudest piece of stationary equipment (a generator) is anticipated to be 82 dBA at 50 feet from the source. At 225 feet with the 8 foot temporary barrier, a generator is anticipated to be 60 dBA. In order to meet the stationary noise limit of 60 dBA, stationary equipment must be staged as far away from the existing residential properties as possible. To meet the construction noise limits, construction will operate between

the hours of 7 AM and 7 PM on weekdays. Stationary equipment will be staged as far away from the existing residential properties as possible, and there will be an 8-foot wall surrounding the existing residential property lines. By implementing the two mitigation measures, **NOI-2** and **NOI-3**, as identified below, construction noise levels can be controlled to a less than significant impact.

Mitigation Measures:

NOI-2 During construction an 8-foot high temporary noise barrier shall be installed along the residential property line.

NOI-3 During construction noisy stationary equipment, such as generators, shall be staged as far away from the existing residential properties as possible.

(Sources: Appendix I)

b) Generation of excessive ground-borne vibration or ground-borne noise levels? (Less Than Significant Impact)

Ground-Bourne Vibration Fundamentals: Vibration Descriptors

Ground-borne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. The effects of ground-borne vibrations typically only cause a nuisance to people, but at extreme vibration levels, damage to buildings may occur. Although ground-borne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. Ground-borne noise is an effect of ground-borne vibration and only exists indoors since it is produced from noise radiated from the motion of the walls and floors of a room and may also consist of the rattling of windows or dishes on shelves.

Several different methods are used to quantify vibration amplitude:

PPV – Known as the peak particle velocity (PPV) which is the maximum instantaneous peak in vibration velocity, typically given in inches per second.

RMS – Known as root mean squared (RMS) can be used to denote vibration amplitude

VdB – A commonly used abbreviation to describe the vibration level

Vibration Perception

Typically, developed areas are continuously affected by vibration velocities of 50 VdB or lower. These continuous vibrations are not noticeable to humans whose threshold of perception is around 65 VdB. Outdoor sources that may produce perceptible vibrations are usually caused by construction equipment, steel-wheeled trains, and traffic on rough roads, while smooth roads rarely produce perceptible ground-borne noise or vibration. To counter the effects of ground-borne vibration, the Federal Transit Administration (FTA) has published guidance relative to vibration impacts. According to the FTA, fragile buildings can be exposed to ground-borne vibration levels of 0.3 inches per second without experiencing structural damage.

Vibration Propagation

There are three main types of vibration propagation: surface, compression, and shear waves. Surface waves, or Rayleigh waves, travel along the ground's surface. These waves carry most of their energy along an expanding circular wavefront, similar to ripples produced by throwing a rock into a pool of water. P-waves,

or compression waves, are body waves that carry their energy along an expanding spherical wavefront. The particle motion in these waves is longitudinal (i.e., in a “push-pull” fashion). P-waves are analogous to airborne sound waves. S-waves, or shear waves, are also body waves that carry energy along an expanding spherical wavefront. However, unlike P-waves, the particle motion is transverse, or side-to-side and perpendicular to the direction of propagation.

As vibration waves propagate from a source, the vibration energy decreases in a logarithmic nature and the vibration levels typically decrease by 6 VdB per doubling of the distance from the vibration source. As stated above, this drop-off rate can vary greatly depending on the soil but has been shown to be effective enough for screening purposes, in order to identify potential vibration impacts that may need to be studied through actual field tests.

Construction Vibration

Construction activities can produce vibration that may be felt by adjacent land uses. The construction of the proposed project would not require the use of equipment such as pile drivers, which are known to generate substantial construction vibration levels. The primary vibration source during construction may be from a bulldozer. A large bulldozer has a vibration impact of 0.089 inches per second peak particle velocity (PPV) at 25 feet which is likely perceptible but below any risk to architectural damage.

The fundamental equation used to calculate vibration propagation through average soil conditions and distance is as follows:

$$PPV_{\text{equipment}} = PPV_{\text{ref}}(25/D_{\text{rec}})^n$$

Where PPV_{ref} – reference PPV at 25 feet

D_{rec} = distance from equipment to receiver in feet

$n = 1.5$ (the value related to the attenuation rate through ground)

The thresholds from the Caltrans Transportation and Construction Induced Vibration Guidance Manual in Table XIII-6 provides general thresholds and guidelines as to the vibration damage potential from vibratory impacts.

Table XIII-6
GUIDELINE VIBRATION DAMAGE POTENTIAL THRESHOLD CRITERIA

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: Table 19, Transportation and Construction Vibration Guidance Manual, Caltrans, Sept. 2013.

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Table XIII-7 gives the approximate vibration levels for particular construction activities. These data provide a reasonable estimate for a wide range of soil conditions.

Table XIII-7
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT¹

Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level LV (dVB) at 25 feet
Pile driver (impact)	1.518 (upper range)	112
	0.644 (typical)	104
Pile driver (sonic)	0.734 upper range	105
	0.170 typical	93
Clam shovel drop (slurry wall)	0.202	94
Hydromill (slurry wall)	0.008 in soil 0.017 in rock	66 75
Vibratory Roller	0.21	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

¹ Source: Transit Noise and Vibration Impact Assessment, Federal Transit Administration, May 2006.

At a distance of 70 feet, a large bulldozer would yield a worst-case 0.019 PPV (in/sec) which is below any risk of damage and likely imperceptible. Thus, the potential vibration impact is less than significant, and no mitigation is required.

Mitigation Measures: No mitigation measures are required

(Sources: 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)*

According to the City General Plan, the only airport within the City is the Skylark Airport (private) located on the southeast side of the Lake, less than one mile southeast of the project site. Based on the City General Plan Update EIR, the Airport does not have any noise contours extending off of the Airport itself. Based on the limited operations at this private airport, future employees at the project site will not be exposed to excessive airport noise levels. No mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR)

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)? (Less Than Significant Impact)*

The proposed Rome Hill Commercial Project would convert vacant land located within the City of Lake Elsinore that is currently designated for commercial and high density residential land uses. The project requires a GPA to Light Industrial and a zone change to C-P, Commercial Manufacturing in order to allow the proposed development. The proposed building square footage totals approximately 92,000 SF. Assuming two (2) employees per 5,000 SF, a maximum of 18 to 20 persons could be employed at the project

site. It is not known whether these employees will be new to the City or whether they will live within the City. The Southern California Association of Government (SCAG) 2019 Local Profile for the City of Lake Elsinore indicates that the 2019 population was estimated at 69,800. The SCAG Demographic and Growth Forecast projects an estimated City population of 90,740 by the year 2035. Thus, the forecast growth through 2035 would readily accommodate the forecast number of potential employees generated by the proposed project. Further, the proposed project will not provide or expand housing resources in the City and no extensions of public infrastructure will be caused by the proposed project. Therefore, the project is not forecast to induce any substantial population growth in the City or surrounding area. No significant impact would occur under this issue and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR; and Connect SoCal 2024, Demographics and Growth Forecast Technical Report)

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

No occupied residences/homes are located on the vacant project site; therefore, implementation of the proposed project will not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. No impacts will occur; therefore, no mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR; site visits)

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 proposed project site is served by Riverside County Fire Department and California Department of Forestry. Fire protection and emergency response services are provided from Station No. 85, which is located at 29405 Grand Avenue. According to the GPEIR, the goals and policies and implementation programs identified in the General Plan are sufficient to ensure adequate fire protection services as development under the GP continues. However, it is primarily through the payment of Development Impact Fees (DIF fees) as a standard condition of approval, the proposed project's incremental impacts to Fire/Emergency response would be less than significant. Further, the City Fire Department has reviewed this project (3/18/25) to ensure that adequate access for emergency vehicles and adequate fire flow will occur at the project site. The project will connect to the existing 12 inch water line in Grand Avenue which will provide adequate fire flow to the future development.

The proposed project will incrementally add to the existing demand for fire protection services. Cumulative fire protection impacts are mitigated through the payment of the Development Impact Fee (DIF), which contains a Fire Facilities component. There is no identified near term need to expand facilities in a manner that could have adverse impacts on the environment, but implementation of the GP policies and programs ensure that impacts from expanding facilities as needed are sufficient to control new facility impacts to a less than significant impact level. The City's General Fund covers operational expenses for fire protection,

and the proposed project will contribute property taxes to the general fund to offset its incremental demand for fire protection services. Any impacts are considered less than significant and no additional mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR)

b) Police protection? (Less Than Significant Impact)

Police protection services are provided by the Riverside County Sheriff's Department from its station in Lake Elsinore. According to the City General Plan EIR, law enforcement protection for the City at buildout should be feasible based on incremental expansion of the number of officers, with perhaps some additional office space at the police station at 333 W. Limited Avenue. The project site is located within existing patrol routes and future calls can be responded to within the identified priority call target response times.

The proposed project will incrementally add to the existing demand for police protection services. According to the City General Plan EIR, these incremental impacts are mitigated through the implementation of State laws and local ordinances; Policy 1.6 of the Community Form chapter, Land Use section; Policies 8.1 through 8.4 under Goal 8 of the Community Facilities and Protection Services section of the Public Safety and Welfare chapter; and Goals 9 through 11 and associated policies of the same Community Facilities section. As part of the City's review process of the proposed project, each of these significance criteria are evaluated and determinations made regarding compliance with these policies verified. The City's General Fund covers operational expenses. The Project will contribute new property taxes to the General Fund to offset this incremental demand for police protection services. Any impacts are considered less than significant and no additional mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR)

c) Schools? (No Impact)

The proposed Project would develop a commercial manufacturing project, and would not generate any direct, new student demand for education services. The Lake Elsinore Unified School District (District) requires a mitigation payment per square foot of commercial and industrial development. The development impact fee mitigation program of the District is presumed by State law to adequately provide for mitigating the impacts of the proposed Project. Since this is a mandatory requirement, no additional mitigation measures are required to achieve a no impact finding.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR)

d) Parks? (Less Than Significant Impact)

Park services are provided by the City and when a project increases demand for park and recreation services, it is required to pay the applicable Park Capital Improvement Fund Fees. The nearest park to the project site appears to be located east of Ontario Way about ½ mile east of the project site. The General Plan concluded that through payment of this fee as a standard condition of approval, the proposed project's incremental impacts to park services would be less than significant. Thus, impacts will remain less than

significant with no mitigation.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR, Chapter 3.15)

e) *Other public services/facilities? (No Impact)*

According to the City General Plan, the City also supports library and animal control services. The proposed project will not create any direct demand on these services. Regardless, any incremental impacts are mitigated through the payment of the DIF. Payment of DIF is deemed adequate mitigation for the proposed project as it will offset potential future demand generated by potential new employees that choose to locate within the City. Any impacts are considered less than significant and no additional mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR)

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? (No Impact)*

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 will develop a commercial manufacturing project that is not forecast to significantly increase the local population or related demand for recreational resources. Therefore, no adverse impact to existing recreational resources will occur nor will there be a requirement to expand such resources. No adverse impact is forecast and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR)

XVII. TRANSPORTATION

The data for the following Transportation/Traffic impact evaluation is abstracted from two reports titled “Exhibit B Scoping Agreement For Traffic Impact Study” and “Rome Hill Commercial VMT Screening, City of Lake Elsinore,” dated 1/2/2024 by TJW Engineering, Inc. These Studies are used extensively in the following analysis, and they are provided as Appendices H1 and H2 to this Initial Study.

a) *Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (Less Than Significant Impact)*

The Project proposes to develop a 92,760 two-building commercial manufacturing facility on the project site. The Project will take access via Grand Avenue and a private driveway along the east side of the property. It is anticipated that the Project will be developed in two phases with an anticipated Opening Year of 2026. The preliminary Project site plan is presented at Figure 3. In order to develop traffic estimates for

the proposed Project, trip-generation statistics published by the Institute of Transportation Engineers (ITE) in their Trip Generation Manual (11th Edition, 2021) for the warehouse category (ITE Land Use Code 150) land use category have been used. The Project is estimated to generate 184 two-way trips per day with a maximum of 18 AM peak hour trips and 19 PM peak hour trips. Refer to Table XVII-1 for this information.

**Table XVII-1
TRIP GENERATION**

Proposed Land Use	Qty	Unit	Daily Trips (ADTs)		AM Peak Hour					PM Peak Hour				
			Rate	Trips	Rate	In:Out Split	Trips			Rate	In:Out Split	Trips		
							In	Out	Total			In	Out	Total
Warehousing (150)	121.49	TSF	1.71	208	0.17	77:23	16	5	21	0.18	28:72	6	16	22
Total				208			16	5	21			6	16	22

Notes: ITE Trip Generation (11th Edition, 2021); TSF=Thousand Square Feet

Based on the City of Lake Elsinore Traffic Impact Analysis Guidelines (June 2020 and amended May 2022), the proposed project generates less than 50 peak hour trips and does not require a Traffic Impact Analysis (TIA) that includes a Level of Service Analysis. Consistent with the City Guidelines, the proposed project does not require additional traffic analysis and will not result in a conflict with a program, plan, ordinance or policy addressing the roadway circulation system. The project will install appropriate circulation system improvements for bicycle and pedestrian facilities and will not conflict with any transit operations. Potential impacts under this issue are less than significant with no mitigation.

Mitigation Measures: No mitigation measures are required.

(Sources: Appendices H1 and H2)

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

Senate Bill 743 (Section 15064.3 (b)) mandates that California Environmental Quality Act (CEQA) guidelines be amended to provide an alternative to Level of Service for evaluating transportation impacts. The amended CEQA guidelines, specifically Section 15064.3, recommend the use of Vehicle Miles Traveled (VMT) for transportation impact evaluation. For the purposes of this analysis the recommended VMT analysis methodology and thresholds identified within the Technical Advisory and the City's new analysis methodology have been used.

The City's Guidelines indicate residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact. In addition, other employment-related land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per service population that is similar to the existing land uses in the low VMT area. For this screening, the WRCOG screening tool was used to determine low VMT-generating areas. The proposed project is located within a low VMT-generating area (see attached). In addition, the proposed project can be reasonably expected to generate VMT per service population similar to the existing land uses within the low VMT area such as the manufacturing/warehousing/industrial buildings along Grand Avenue and the surrounding area. As such, the proposed project can be presumed to have a less than significant impact on VMT and can be screened from VMT analysis. Consistent with the City guidelines, the proposed project does not require additional VMT analysis. Refer to Figure XVII-1 for the analysis. Based on this information, the proposed Project does not require additional traffic or VMT analysis and is screened out. Thus, the proposed Project will not have a significant impact on regional VMT.

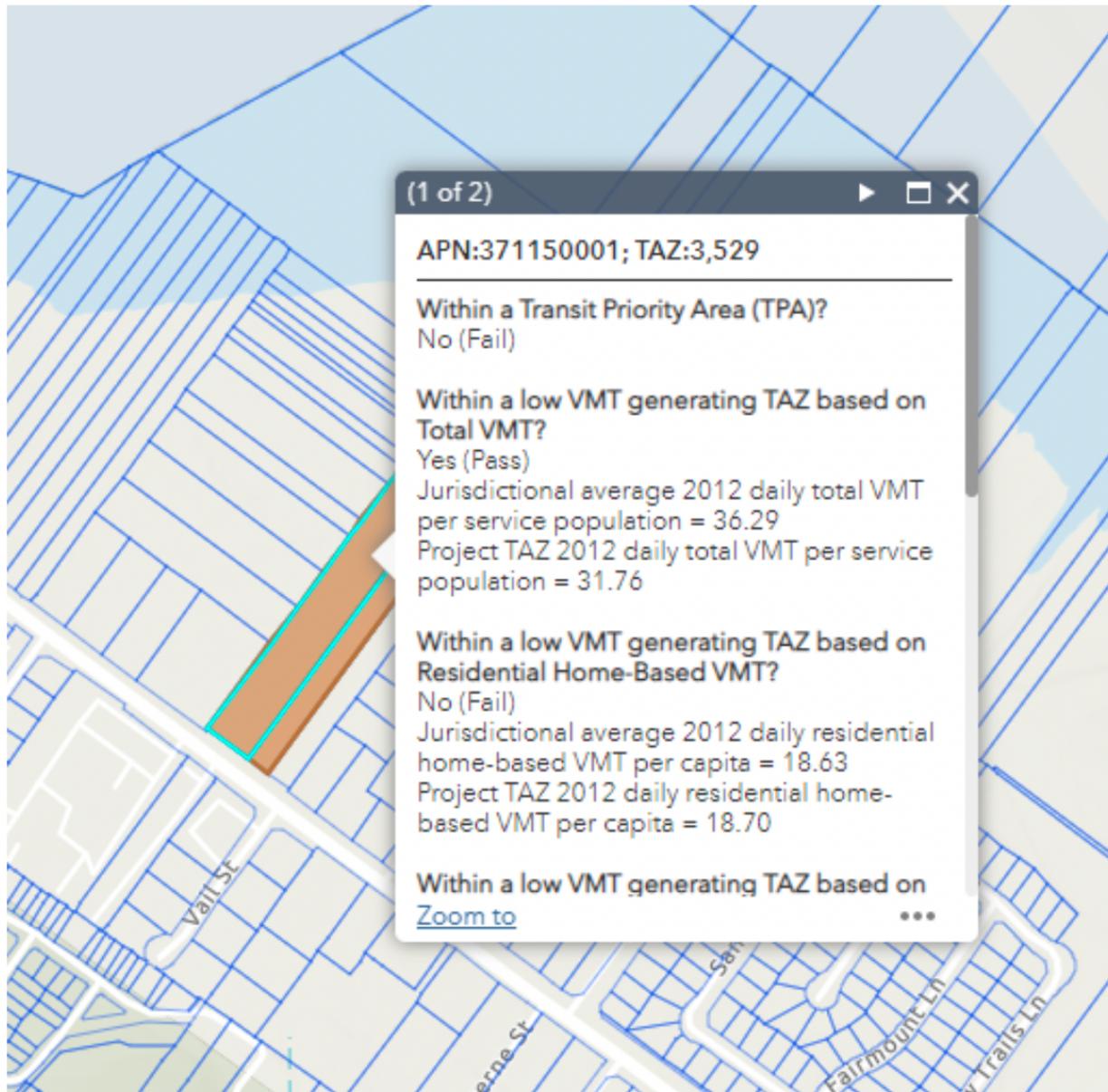


Figure XVII-1: VMT Part 1

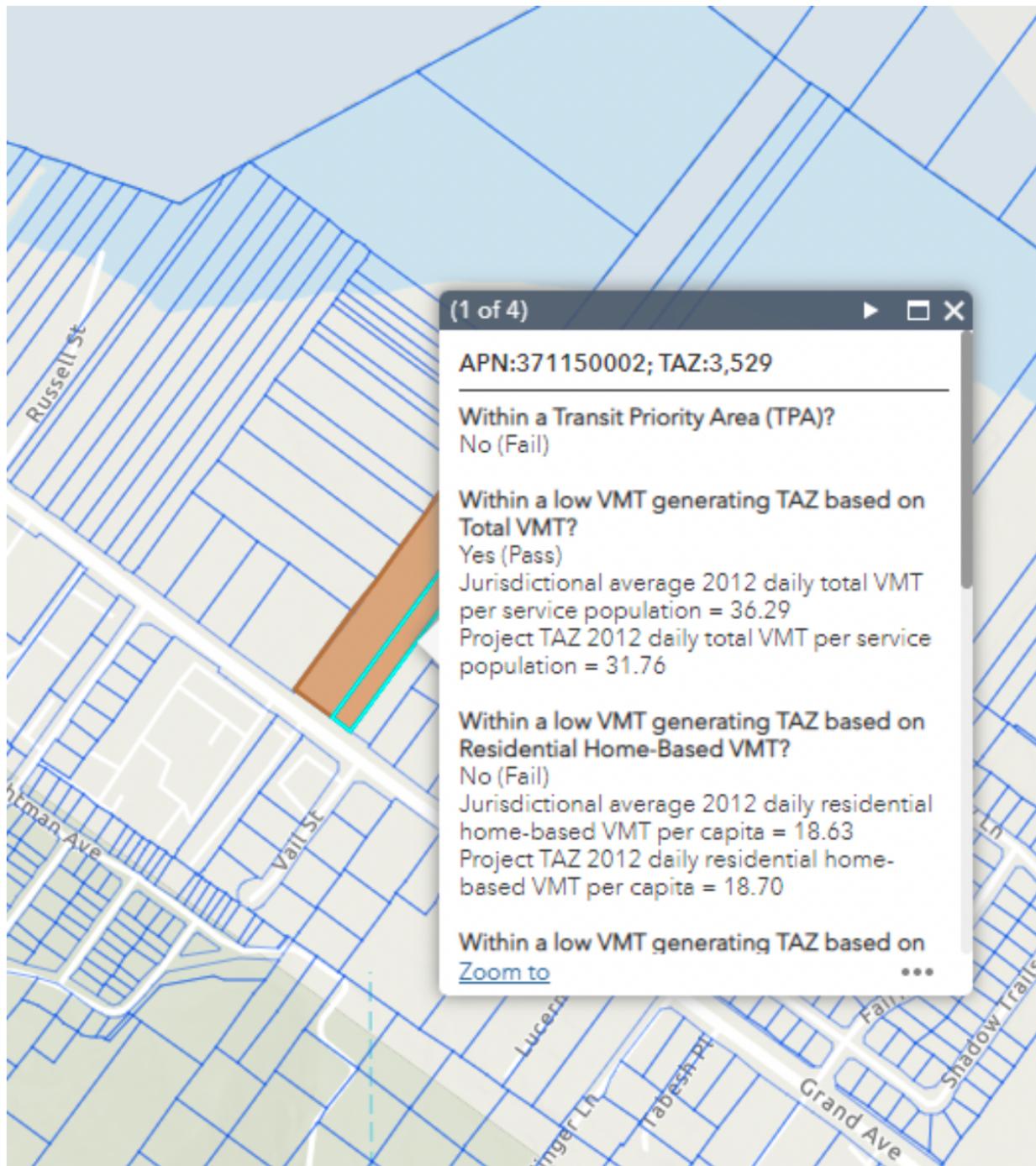


Figure XVII-1: VMT Part 2

Mitigation Measures: No mitigation measures are required.

(Sources: Appendices H1 and H2)

Design of driveways, internal roadways, and intersections will be based on City Code, which sets the standard for such design. As such the Project will construct the project access driveways in accordance with designs shown in Figure XVII-1. Based on these direct project design improvements in the circulation

system, it is not anticipated that traffic hazards will increase. As such, the Project development would have a less than significant potential to increase hazards due to geometric design features or incompatible uses.

- c)** *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (No Impact)*

All proposed new roads are consistent with the City's General Plan Circulation Element. Thus, the proposed project has no potential to increase hazards due to a geometric design feature or an incompatible use at this location. No mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City General Plan and Site Plan Figure 3)

- d)** *Result in inadequate emergency access? (Less Than Significant Impact)*

The proposed project will have minor effects on the circulation system during construction, but any encroachment into the roadways will be required to implement traffic controls to protect adequate access. Project access will be designed in accordance with all applicable design and safety standards required by adopted fire codes, safety codes, and building codes established by the City's Engineering and Fire Departments. During construction, only adjacent roadways will be impacted and the adjacent roadway does not provide essential access to any areas at present. The parking lots and site layouts will be designed to meet requirements to allow emergency vehicles adequate access. The design of the proposed project will be reviewed by the Fire Department to ensure that adequate emergency access is provided. Therefore, the proposed Project will have a less than significant potential to result in inadequate emergency access.

Mitigation Measures: No mitigation measures are required.

(Sources: City General Plan and Site Plan Figure 3)

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 With Mitigation Incorporated)*

- 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)*

Changes in the California Environmental Quality Act, effective July 2015, require that the City address a new category of cultural resources – tribal cultural resources – not previously included within the law's purview. Tribal Cultural Resources are those resources with inherent tribal values that are difficult to identify through the same means as historical or archaeological resources. These resources can be identified and understood only through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as cultural landscapes or sacred places. The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

Changes in the California Environmental Quality Act, effective July 2015, require that the City address a new category of cultural resources – tribal cultural resources – not previously included within the law’s purview. Tribal Cultural Resources are those resources with inherent tribal values that are difficult to identify through the same means as historical or archaeological resources. These resources can be identified and understood only through direct consultation with the tribes that attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as cultural landscapes or sacred places. The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

Assembly Bill 52 (AB52), 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 establishes 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 Section 21082.3(c).

On March 8, 2024, the City provided written notification of the project in accordance with AB 52 to six (6) Native American tribes that requested to receive such notification from the City. Of the tribes notified, the Rincon Band of Luiseño Indians, Pechanga Band of Indians, and Soboba Band of Luiseño Indians requested formal government-to-government consultation under AB 52. As a result, the following consultations occurred:

- Rincon Band of Luiseño Indians: The City held consultation meetings with the Rincon Band of Luiseño Indians on May 9, 2024 and July 23, 2025. As part of the consultation, the Rincon of Luiseño Indians did not identify potential TCRs within the project’s potential impact limits. However, the Rincon Band of Luiseño Indians did indicate a concern over the potential for uncovering TCRs or other tribal-affiliated resources during construction of the project. In response, City Planning staff provided the Rincon Band of Luiseño Indians with recommended mitigation measures for review to address the potential for subsurface TCRs on the project site. The mitigation measures agreed to by the various tribes that were consulted are provided in **CUL-1** through **CUL-7** in Item V. The Rincon Band of Luiseño Indians indicated that they were in agreement with the identified mitigation measures and acknowledged that the Pechanga Band of Indians and Soboba Band of Luiseño Indians would be the monitoring tribes for the project, and the AB 52 consultation process was concluded on July 31, 2025.

- Soboba Band of Luiseño Indians: The City held consultation meetings with the Soboba Band of Luiseño Indians on June 24, 2024, December 19, 2024, April 17, 2025, July 2, 2025, August 14, 2025, and August 21, 2025. As part of the consultation, the Soboba Band of Luiseño Indians did not identify potential TCRs within the project's potential impact limits. However, the Soboba Band of Luiseño Indians did indicate a concern over the potential for uncovering TCRs or other tribal-affiliated resources during construction of the project. In response, City Planning staff provided the Soboba Band of Luiseño Indians with recommended mitigation measures for review to address the potential for subsurface TCRs on the project site. The mitigation measures agreed to by the various tribes that were consulted are provided in **CUL-1** through **CUL-7** in Item V. The Soboba Band of Luiseño Indians indicated that they were in agreement with the identified mitigation measures, and the AB 52 consultation process was concluded on August 29, 2025.
- Pechanga Band of Indians: The City held consultation meetings with the Pechanga Band of Indians on May 8, 2024, November 15, 2024, December 19, 2024, April 22, 2025, August 14, 2025, and August 21, 2025. As part of the consultation, the Pechanga Band of Luiseño Indians did not identify potential TCRs within the project's potential impact limits. However, the Pechanga Band of Indians did indicate a concern over the potential for uncovering TCRs or other tribal affiliated resources during construction of the project. In response, City Planning staff provided the Pechanga Band of Indians with recommended mitigation measures for review to address the potential for subsurface TCRs on the project site. The mitigation measures agreed to by the various tribes that were consulted are provided in **CUL-1** through **MM CUL-7** in Item V. The AB 52 consultation process was concluded on August 29, 2025.

Although no specific Tribal Cultural Resources were identified, the consulting tribes expressed concerns that the project has the potential for unknown TCRs to be discovered during grading and other ground-disturbing activities. Therefore, **MM CUL-1** through **MM CUL-7** identified in Items V(b) and V(c), above, would be implemented to ensure that potential impacts to TCRs pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 would be less than significant.

Mitigation Measures: see **CUL-1** through **CUL-7** in Item V above.

(Sources: Tribal Consultation)

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)
Water

Less Than Significant Impact – Water will be provided by the Elsinore Valley Municipal Water District (EVMWD). Water service is available through a connection to a 12 inch water main located adjacent to the project site on Grand Avenue. The project would be supplied with water by EVMWD that uses imported water from the Metropolitan Water District of Southern California (MWD), local groundwater, and recycled water to meet customer demand. Using imported surface water helps prevent overdraft of local groundwater basins. As previously stated under Section X, Hydrology and Water Quality, the City's GPEIR (2011) identifies sufficient water resources to meet demand in its service area through 2030. The available water supply within the District's retail service area is anticipated to be greater than the demand for water in the future, which indicates that EVMWD has available capacity to serve the proposed commercial project without requiring the construction of new water facilities beyond those that would be developed within the project site to serve residences within the project site. Because the proposed project encompasses less than

100,000 SF of commercial development, the preparation of a Water Supply Assessment (WSA) by is not required. Therefore, development of the Rome Hill Commercial Development Project would not result in a significant environmental effect related to the relocation or construction of new or expanded water facilities. Impacts are less than significant.

Wastewater

Less Than Significant Impact – Wastewater collection will be provided by Elsinore Valley Municipal Water District (EMWD or District) and the project will connect to the 15 inch sewer main located on the project site. Municipal wastewater is delivered to one of EVMWD's four regional water reclamation facilities which treat wastewater generated for the project site and surrounding area. The District is responsible for the collection, transmission, treatment, and disposal of wastewater within its service area, which includes portions of the City of Lake Elsinore and surrounding communities. As such, the project would connect to the District's existing wastewater collection system within the property itself. Wastewater management agencies must ensure that adequate treatment capacity is available for its service area well before the excess demand is generated, and adequate capacity is maintained at its Regional Water Reclamation Facilities to ensure treatment and collection capacity are in place before development occurs. Therefore, development of the proposed project would not result in a significant environmental impact related to the relocation or construction of new or expanded wastewater facilities. Impacts are less than significant.

Stormwater

Less Than Significant Impact – The surface runoff from the site, nonpoint source storm water runoff, will be managed in accordance with the SWPPP prepared for site construction and the WQMP over the long-term, as discussed in the Hydrology and Water Quality Section (Section X) of this Initial Study. Onsite flows will be collected at the northeast corner of the project site within a large underground infiltration basin. This system will be designed to capture the increment of additional flow over the natural peak 100-year flow runoff from the project site. This extra flow will be detained on site and the historic volume will be discharged to Lake Elsinore in conformance with City of Lake Elsinore and Riverside County MS4 requirements. Therefore, surface water will be adequately managed on site and as such, development of the Project would not result in a significant environmental effect related to the relocation or construction of new or expanded stormwater facilities. Impacts are less than significant.

Electric Power

Less Than Significant Impact – Southern California Edison (SCE) will provide electricity to the site and the power distribution system located adjacent to the site along Grand Avenue will be able to supply sufficient electricity. The effort to connect to the existing electrical system, and to install electricity connections within the project site to serve future residents of the proposed Project with electricity is not anticipated to result in significant impacts, as evidenced by the discussions in preceding sections. The proposed project will install solar electric systems at the project site in accordance with the current building code requirements. Therefore, development of the Project would not result in a significant environmental effect related to the relocation or construction of new or expanded electric power facilities. Impacts are less than significant.

Natural Gas

Less Than Significant Impact – Natural gas will be supplied by Southern California Gas. The site will connect to the existing natural gas line adjacent to the project site in Grand Avenue. The effort to connect to the existing gas line within the adjacent roadway, and to install natural gas lines within the project site to serve future tenants of the proposed Project with natural gas is not anticipated to result in significant impacts, as evidenced by the discussions in preceding sections. Therefore, development of the Project

would not result in a significant environmental effect related to the relocation or construction of new or expanded natural gas facilities. Impacts are less than significant.

Telecommunications

Less Than Significant Impact – Development of the Rome Hill Commercial Development Project would require a connection to telecommunication services, such as wireless internet service and phone service. The local service provider is Verizon. This can be accomplished through connection to existing services that are available to the developer at the project site. Therefore, development of the project would not result in a significant environmental effect related to the relocation or construction of new or expanded telecommunications facilities. Impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR and Utility Will Serve letters)

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)*

Please refer to the discussion under Hydrology, Section X(b) above. The Rome Hill Commercial Development Project is two structure commercial site with approximately 92,700 SF of area. It is anticipated to demand about 15 AFY of water from EVMWD. The available water supply within the District's retail service area is anticipated to be greater than the demand for water in the future, which indicates that EVMWD has available capacity to serve the proposed project. As such, given that EVMWD's evaluation in the City GPEIR and the District's Urban Water Management Plan (UWMP) indicates that the water district anticipates ample water supply will be available to serve the project's daily/annual demand, including during normal, dry and multiple dry years. Therefore, the project would have sufficient water supplies available to serve it and reasonably foreseeable future development during normal, dry and multiple dry years. Impacts under this issue are considered less than significant.

Mitigation Measures: Other than implementing current water management requirements of the District, no mitigation measures are required.

(Sources: City of Lake Elsinore General Plan, the GPEIR, EVMWD's UWMP for 2020)

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)*

Municipal wastewater is delivered to the one of EVMWD's four regional water reclamation facilities which treat an estimated 20 million gallons of wastewater per day. The District is responsible for the collection, transmission, treatment, and disposal of wastewater within its service area, which includes portions of the City of Lake Elsinore, California. Given the available capacities at District wastewater treatment plants, it is anticipated that the District has available capacity to accommodate the anticipated wastewater generated from the new commercial development, as discussed under the Hydrology section above, and as such would generate an estimated 100 gallons of wastewater per employee per day. No new major system upgrades or expansion will be required for the wastewater system with a 15 inch sewer line available in Grand Avenue to receive wastewater. Accessing the adjacent wastewater utility system will not result in a significant impact to the environment from providing wastewater services to the proposed project site and the District has adequate treatment capacity at its Regional Plants to meet this new demand. Impacts under this issue are less than significant.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR)

- c) *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)*
- d) *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (No Impact)*

The proposed Project will generate demand for solid waste service system capacity and has a potential to contribute to potentially significant cumulative demand impacts on the solid waste system. Solid waste generation at the proposed Project is estimated to be two 10-yard bins per week. Solid waste capacity has been expanded to provide adequate disposal capacity for cumulative demand over at least the next five years. Combined with the City's mandatory source reduction and recycling program, the proposed Project is not forecast to cause a significant adverse impact to the waste disposal system due to the available capacities at nearby landfills.

According to the Integrated Waste Management Board Jurisdiction Diversion and Disposal Profile for City of Lake Elsinore, the following disposal facilities were used by the City most recently (the most recent year for which data was found): Badlands Disposal Site (Riverside), El Sobrante Sanitary Landfill (Riverside), Lamb Canyon Disposal Site (Riverside). More than 50% of waste produced within Riverside County is also disposed of within the County. Descriptions of the primary disposal facilities and their capacity are summarized below.

El Sobrante Sanitary Landfill is located at 10910 Dawson Canyon Road east of Interstate 15 in the Gavilan Hills. According to the State of California's Solid Waste Information System, the landfill is active and permitted with a projected closure date of January 1, 2051. The site is currently permitted to a capacity of 209,910,000 cubic yards with a remaining capacity of 143,977,170 cubic yards and permitted throughput of 16,054 tons per day.

Badlands disposal site is located at 31125 Ironwood Ave, Moreno Valley 92373. According to the State of California's Solid Waste Information System, the landfill is active and permitted with a projected closure date of January 1, 2022. The site is currently permitted to a capacity of 34,400,000 cubic yards with a remaining capacity of 15,748,799 cubic yards and permitted throughput of 4,800 tons per day.

Lamb Canyon disposal site is located on Lamb Canyon Road three miles south of Beaumont 92223. According to the State of California's Solid Waste Information System, the landfill is active and permitted with a projected closure date of April 1, 2029. The site is currently permitted to a capacity of 38,935,653 cubic yards with a remaining capacity of 19,242,950 cubic yards and permitted throughput of 5,000 tons per day.

Several of the referenced landfills will be permitted to contain greater volumes of waste in the near future. Any hazardous materials collected on the project site during either construction or operation of the Project will be transported and disposed of by a permitted and licensed hazardous materials service provider. Therefore, the Project is expected to comply with all regulations related to solid waste under federal, state, and local statutes and be served by a landfill(s) with sufficient permitted capacity to accommodate the Project's solid waste disposal needs. No further mitigation is necessary.

XX. WILDFIRE

- a) *Substantially impair an adopted emergency response plan or emergency evacuation plan? (Less Than Significant Impact)*

The project site is located within an area that has mixed designations for wildfire hazards that range from Moderate to Very High as the area contains a rapid transition from Moderate to Very High wildfire hazards. The project site exhibits a low to dense fuel load with some trees on the property and non-native grasses and shrubs. Two fire stations are located near the project site: Stations 11 (Lakeland Village Station) and 51 (El Cariso Station), refer to Figure 3-1, Wildfire Susceptibility in the General Plan. The proposed development will be limited to the project site and immediately adjacent areas of roadway improvements on Grand Avenue. The limited roadway adjacent to the project site and the potential for impairing an emergency response or evacuation plan is minimal. Grand Avenue is the local emergency roadway and the project construction and ongoing use of this roadway will not be affected by the proposed project. Impacts are less than significant under this issue and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR)

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

The proposed project site is located on a relatively flat parcel of land; is not subject to significant prevailing winds that could exacerbate wildfire risks; and has no other special circumstances that would concentrate pollutant concentrations from a wildfire or to uncontrolled spread of wildfire. In fact, proximity to the Lake reduces the potential for the uncontrolled spread of wildfire in the area. The land to the south and east has been developed and the remaining vacant land has a modest to high fuel load. The impact under this issue is less than significant and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR)

- 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)*

The proposed project will not install or extend any infrastructure that could exacerbate fire hazards within the project area or the adjacent wildfire hazard area. No impact is forecast and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan, the GPEIR and Figure 2, Aerial Photo)

- 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)*

The proposed project will not create new significant risks, such as downslope or downstream flooding or landslides, due to drainage system modifications or post-fire slope instability. No impact is forecast and no

mitigation is required.

Mitigation Measures: No mitigation measures are required.

(Sources: City of Lake Elsinore General Plan and the GPEIR)

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. The analysis in this Initial Study and the findings reached indicate that the proposed project can be implemented without causing any new project specific or cumulatively considerable unavoidable significant adverse environmental impacts. Mitigation is required to control potential environmental impacts of the proposed project to a less than significant impact level. The following findings are based on the detailed analysis of the Initial Study of all environmental topics and the implementation of the mitigation measures identified in the previous text and summarized following this section.

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

The Project has no potential to cause a significant impact to any biological or cultural resources, with implementation of mitigation measures. The Project has been identified as having a less than significant potential to degrade the quality of the natural environment, substantially reduce 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, or reduce the number or restrict the range of a rare or endangered plant or animal. The Project requires mitigation to prevent significant biological resource impacts from occurring as a result of implementation of the Project. Based on the historic disturbance of the site, and its current disturbed condition, the potential for impacting cultural resources is low. The Cultural Resources Report determined that no significant archaeological or historical resources of importance were found at the project site, so it is not anticipated that any resources could be affected by the Project because no significant cultural resources exist. However, because it is not known what could be unearthed upon any excavation activities, contingency mitigation measures are provided to ensure that, in the unlikely event that any resources are found are discovered, they are protected by proper management from any potential significant impacts. Please see biological and cultural sections of this 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 With Mitigation Incorporated)*

The Project has 18 potential impact categories that are individually limited, but may be cumulatively considerable. These are: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Greenhouse Gases, Hydrology & Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. Cumulative traffic, air quality, greenhouse gas, etc. impacts are considered as part of the analysis contained under the related impact category. Only four of the above issues (Biology, Cultural Resources, Hazards and Noise) require the implementation of mitigation measures to reduce potential adverse cumulative environmental impacts to a less than significant level and

ensure that cumulative effects do not become cumulatively considerable. All other environmental issues were found to have no significant impacts without implementation of mitigation. The potential cumulative environmental effects of implementing the proposed Project have been determined to be less than cumulatively considerable and thus, less than significant impacts.

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

The proposed Project includes activities that have a potential to cause direct substantial adverse effects on humans. The issues of Air Quality, Geology and Soils, Hazards & Hazardous Materials, Hydrology and Water Quality, Noise and Wildfire can all have direct impacts on humans, but only Geology and Soils, Hazards and Noise require the implementation of mitigation measures to reduce potential human impacts to a less than significant level. All other direct human impact environmental issues were found to have no significant impacts on humans without implementation of mitigation. The potential for direct human effects from implementing the proposed Project have been determined to be less than significant.

Conclusion

This document evaluated all CEQA issues contained in the latest Initial Study Checklist form. The evaluation determined that either no impact or less than significant impacts would be associated with the issues of Aesthetics, Agriculture and Forestry Resources, Air Quality, Energy, Greenhouse Gases, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Transportation, Utilities & Service Systems, and Wildfire. The issues of Biological Resources, Cultural Resources, Geology & Soils, Hazards & Hazardous Materials, Noise, and Tribal Cultural Resources, require the implementation of mitigation measures to reduce Project specific and cumulative impacts to a less than significant level. The required mitigation has been established in this Initial Study to reduce impacts for these issues to achieve a less than significant impact level.

Based on the evidence and findings in this Initial Study, the City of Lake Elsinore proposes to adopt a Mitigated Negative Declaration (MND) for the Rome Hill Commercial Development Project. A Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) will be issued for this project by the City. The Initial Study and NOI will be circulated for 30 days of public comment. At the end of the 30-day review period, a final MND package will be prepared and it will be reviewed by the City for possible adoption at a future public hearing(s), the date for which has yet to be determined. If you or your agency comments on the MND/NOI for this Project, you will be notified about the meeting date in accordance with the requirements in Section 21092.5 of CEQA (statute).

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.

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